

# Planning Committee

## Agenda 05 March 2021

10.00am

This is a remote meeting held under the Broads Authority's [Standing Orders on Procedure Rules for Remote Meetings](#).

**Participants:** You will be sent a link to join the meeting. The room will open at 9.00am and we request that you **log in by 9.30am** to allow us to check connections and other technical details.

**Members of the public:** We will publish a live stream link two days before the meeting at [Planning Committee - 5 March 2021 \(broads-authority.gov.uk\)](#). The live stream will be suspended for any exempt items on the agenda. Please email [committees@broads-authority.gov.uk](mailto:committees@broads-authority.gov.uk) with any queries about this meeting.

### Introduction

1. To receive apologies for absence
2. To receive declarations of interest
3. **To receive and confirm the minutes of the Planning Committee meeting held on 5 February 2021 (Pages 3-13)**
4. Points of information arising from the minutes
5. To note whether any items have been proposed as matters of urgent business

### Matters for decision

6. Chairman's announcements and introduction to public speaking  
Please note that public speaking is in operation in accordance with the Authority's [Code of Conduct for Planning Committee](#) and the new Government regulations and standing orders agreed by the Authority.
7. Request to defer applications include in this agenda and/or vary the order of the agenda
8. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**
  - 8.1. BA/2021/0028/FUL – Whitlingham Country Park: construction of toilet block (Pages 14-20)



## Enforcement

9. **Enforcement update** (Pages 21-25)  
Report by Head of Planning
10. **Tree in Oulton Broad Conservation Area - Prosecution** (Pages 26-33)  
Report by Historic Environment Manager

## Policy

11. **Adopting the Peat Guide** (Pages 34-74)  
Report by Planning Policy Officer
12. **Norfolk Strategic Planning Framework version 3 endorsement** (Pages 75-211)  
Report by Planning Policy Officer
13. **Local Plan for the Broads - review** (Pages 212-217)  
Report by Planning Policy Officer
14. **Review of Scheme of Delegated Powers to Officers** (Pages 218-234)  
Report by Director of Strategic Services
15. **Winterton Neighbourhood Plan – agreeing to consult** (Pages 235-397)  
Report by Planning Policy Officer
16. **Consultation documents update and proposed response** (Pages 398-406)  
Greater Norwich Local Plan  
Report by Planning Policy Officer

## Matters for information

17. **Circular 28/83 – Publication by Local Authorities about the handling of planning applications – quarter 4 (1 October to 31 December 2020)** (Pages 407-413)  
Report by Planning Technical Support Officer
18. **Appeals to the Secretary of State update** (Pages 414-416)  
Report by Senior Planning Officer
19. **Decisions made by Officers under delegated powers** (Pages 417-420)  
Report by Senior Planning Officer
20. **To note the date of the next meeting – Friday 26 March 2021 at 10.00am**



# Planning Committee

## Minutes of the meeting held on 05 February 2021

### Contents

1.	Apologies and welcome	2
	Openness of Local Government Bodies Regulations 2014	2
2.	Declarations of interest	2
3.	Minutes of last meeting	2
4.	Points of information arising from the minutes	2
5.	Matters of urgent business	3
6.	Chair's announcements and introduction to public speaking	3
7.	Requests to defer applications and/or vary agenda order	3
8.	Applications for planning permission and consideration of enforcement matters	3
	(1) BA/2020/0238/FUL: land north of Wood Street, Catfield	3
	(2) Enforcement – Beauchamp Arms - Prosecution	6
9.	Enforcement update	7
10.	Greater Norwich Local Plan Regulation 19 consultation	8
11.	Adopting the Residential Moorings Guide	8
12.	Consultation documents update and proposed response	9
13.	Heritage Asset Review Group – notes of meeting	9
14.	Appeals to the Secretary of State	9
15.	Decisions made by officers under delegated powers	9
16.	Date of next meeting	9
	Appendix 1 – Declaration of interests Planning Committee, 05 February 2021	11



## **Present**

Bruce Keith - in the Chair\*, Harry Blathwayt, Stephen Bolt, Bill Dickson, Andree Gee, Gail Harris, Lana Hemsall, Tim Jickells, James Knight, Leslie Mogford (from item 10), Vic Thomson, Melanie Vigo di Gallidoro, Fran Whymark.

\*Due to experiencing technical issues involving intrusive background noise, Melanie Vigo di Gallidoro relinquished the Chair to the Vice-Chair for the duration of the meeting.

## **In attendance**

Natalie Beal – Planning Policy Officer, Essie Guds – Governance Officer (Meeting Moderator), Jack Ibbotson – Planning Officer, Sarah Mullarney – Governance Officer (Meeting Moderator), Cheryl Peel – Senior Planning Officer, Cally Smith – Head of Planning, Marie-Pierre Tighe – Director of Strategic Services, Sara Utting – Governance Officer (minute taker) and Tony Wilkins – Planning Officer (Compliance & Implementation)

Mike Burrell, Greater Norwich Planning Policy Manager attended for item 10 and Steven Bolt of Birketts attended for item 8(2).

## **Members of the public in attendance who spoke**

Daniel Hercock (applicant) for item 8(1) - application BA/2020/0238/FUL - land north of Wood Street, Catfield

## **1. Apologies and welcome**

The Chair welcomed everyone to the meeting.

## **Openness of Local Government Bodies Regulations 2014**

The Chair explained that the meeting would be held remotely in accordance with the Coronavirus Regulations 2020 and the Standing Orders for remote meetings agreed by the Broads Authority on 22 May 2020. The meeting would be live streamed and recorded and the Authority retained the copyright. The minutes remained the record of the meeting.

## **2. Declarations of interest**

Members provided their declarations of interest as set out in Appendix 1 to these minutes and in addition to those already registered.

## **3. Minutes of last meeting**

The minutes of the meeting held on 8 January 2021 were approved as a correct record and would be signed by the Chairman.

## **4. Points of information arising from the minutes**

### **Minute 11 – Neighbourhood Plans**

The Head of Planning reported that Gt Yarmouth Borough Council had advised both Rollesby and Filby Parish Councils not to proceed with the consultation stage for their Neighbourhood



Plans on the basis that the current restrictions under Covid19 would affect the public's ability to participate, particularly public meetings. Accordingly, both parish councils had agreed to postpone.

## 5. Matters of urgent business

There were no items of urgent business

## 6. Chair's announcements and introduction to public speaking

**Public Speaking:** The Chair stated that public speaking was in operation in accordance with the Authority's Code of Conduct for Planning Committee.

## 7. Requests to defer applications and/or vary agenda order

No requests to defer or vary the order of the agenda had been received.

## 8. Applications for planning permission and consideration of enforcement matters

The Committee considered the following application submitted under the Town and Country Planning Act 1990 (also having regard to Human Rights), and reached the decision set out below. Acting under its delegated powers, the Committee authorised the immediate implementation of the decision.

The following minutes relate to additional matters of information or detailed matters of policy not already covered in the officer's report, which were given additional attention.

(1) BA/2020/0238/FUL: land north of Wood Street, Catfield

**Habitat restoration works including excavation of 0.45Ha pool**

**Applicant: RSPB – Mr Daniel Hercock**

The Planning Officer (PO) provided a detailed presentation of the application for engineering works directly associated with a proposed scheme of Crassula eradication, involving the excavation of a pond measuring 0.45Ha, dug up to a maximum 60cm in depth but mainly 30-50cm. The PO advised that the comments of the Broads Authority Ecologist had been omitted from section 3 of the report, but had been considered as part of the assessment and he summarised these at the meeting, confirming that they had no objection. Finally, as the applicant had submitted amended details on the landscaping for the burial area, the condition relating to additional details of raised land form needed to be amended to reflect compliance with these details and the officer recommendation was amended accordingly.

In assessing the application, the PO addressed the key issues of the principle of the development, which considered the impact upon the statutorily protected habitat and nature reserve's site features; and the site specific considerations of impacts upon the wider landscape, peat soil and flood risk. He concluded that both the NPPF and Local Plan for the



Broads supported the works in principle as the scheme had the primary objective to restore and create new habitat. The landscape features would not have an adverse landscape impact and the impact of the loss of the peat had been minimised. Furthermore, the landscape feature of the shallow pond was considered to potentially result in biodiversity gain. On balance, the benefits of the scheme in terms of protecting the site's conservation importance far outweighed the impacts of the potential for loss of peat in the form of potential CO2 emissions and the proposal was potentially a temporary process if this resulted in the eradication of the Crassula, with remediation works after a period of 10 years to bring the site into a more natural state. Accordingly, the officer recommendation was to approve, subject to conditions.

A member referred to the statement in paragraph 1.5 of the report about the site being at risk of flooding and questioned what would happen if no action was taken, eg could flooding spread the weed into water systems and rivers; was the proposal to create a pool in an area where the water already existed at high level and what was the prospect of the earthworks subsiding anyhow. The PO responded that, in terms of flooding, the sites were interconnected with drainage channels and linked to the river network at times of flooding. This was of concern to both the applicant and the Environment Agency as it meant there was potential for the Crassula to spread and this proposal was to eradicate it completely to prevent the risk of further spread. The area in which the pool would be located was currently covered by water at times of high water level and vegetation around the pool would be similar to what was there currently. Regarding succession of planting, this was a natural process of fenland areas so impact would be minimised.

Mr Hercock, the applicant, provided a statement in support of the application, explaining that the risk of Crassula to the rest of the site was pretty significant as it was a very invasive weed. The RSPB had purchased the site in 2013 and had done what they could to keep the weed in check including spraying but it kept coming back. The best option was to eradicate it completely. The effects of deer traipsing through the site meant it regenerated via the deers' hooves spreading all over the site as well as via birds' feet etc as only a very small particle of Crassula was needed to spread it. There were nesting Cranes in the area and they foraged in that area so it was important to stamp out all possible routes of spreading Crassula. A solution was needed to stamp out any possible route of spread and this would be via burying under peat and compacting it. The pond area would stay wet for significant parts of the year, excluding the summer, so would be a feature, as well as providing a habitat for rare plants and food for insects, caterpillars, butterflies etc. Over a period of about 20 years, the area would revert to a fen habitat, fill in with peat and reform. The fen would be re-lowered over time and allowed to succeed, providing an environment for rare snails to colonise there and also attract bitterns and other birds, dragonflies, water voles etc. The pond would be a lovely addition to the area. The peat would dry out somewhat over time but would generally remain wet as it would be sitting in water a lot of the time, with the CO2 release not being as significant as it would if left on uplands to dry out. The peat would reduce by a third over three years, by which time hopefully the Crassula would be eradicated. Trials where Crassula had been covered but had not been successful were where it had been uncovered too early.



In response to a member's question on whether this technique had been trialled elsewhere and proven successful, Mr Hercock stated that they had reviewed a lot of literature on Crassula eradication. Burying/covering had been trialled in the New Forest in particular, with some lesser trials elsewhere in the Broads area, at Halvergate, where Crassula had been buried in the ditch and this seemed to be working. Most conclusions were that spraying with Roundup was the most effective but only up to 90% and within a year, the Crassula grew back in the original area it had colonised. By burying it as well, this prevented photosynthesis and stopped it growing – use Roundup first, then bury it and not disturb it too early.

In response to questions on whether there were any unintended effects of using Glyphosate, which had experienced a bad press lately; had the trials of using hot foam in the New Forest worked and finally had the use of black plastic sheets been considered (although not necessarily practical in this case), Mr Hercock commented that using any chemicals was not ideal but there were suitable variations for aquatic systems (Roundup GEL) which did degrade very quickly in aquatic systems so this was the least harmful variety they could use. He added that Crassula created an almost 100% mat across the surface which prevented other plants from growing. Other plants would be affected by spraying but not underwater as the spray would be done via dry air conditions, not underwater, via three applications and hopefully with minimum impact to other plants. The use of hot foam had been considered but due to the nature of the site, with other plants growing in the adjoining areas, it was not 100% guaranteed to get in deer tracks, peat crevices etc. Conservation evidence showed that the use of hot foam at places like the New Forest was only 20% effective at killing Crassula so was not as good as Roundup. In addition, Natural England were not keen on the use of plastics and the RSPB had consulted other experts and the manufacturers said working with the plastic was very tricky when you were trying to avoid contamination via machinery, the workers etc. Placing peat on top to bury the plastic as well created folds and air pockets where the Crassula could survive. Peat compression would solve that.

Lana Hempsall proposed, seconded by Andree Gee, to approve the application, subject to conditions.

A member expressed his support for the proposal and questioned if it would be a standard condition to preserve the peat to keep it wet; if the process would need to be repeated in the future and would it be optimistic to think this would kill the Crassula once and for all and finally, would the low level use of Glyphosate be able to control it in the future rather than having to dig out another pond and peat burial.

Mr Hercock responded that there were no guarantees and monitoring would occur once a month for the next five years at least and probably beyond. Glyphosate would need to be used if strands started to peep out, advising that chemicals were effective up to a point, particularly in small areas. Biological control methods were being developed, such as a weevil from New Zealand that has Crassula as a food plant, and this would be a possibility in another 5-10 years' time.



Another member expressed his support for the application, stating that the applicant was being realistic and nothing was guaranteed, with the benefits far outweighing the impact of the loss of peat.

**It was resolved unanimously**

**to approve the application** subject to the conditions outlined within the report (as amended).

**(2) Enforcement – Beauchamp Arms - Prosecution**

The Head of Planning (HoP) introduced her report seeking authority to commence prosecution proceedings in respect of the non-compliance with a Planning Contravention Notice (PCN) relating to the Beauchamp Arms. The HoP also provided a detailed presentation, including photographs of the site.

It was noted the issues had first arisen in 2018 when officers became aware that a number of static caravans had been installed on land adjacent to the driveway at the Beauchamp Arms, as detailed in the report. Officers had continued to monitor the site and PCNs were served in March 2019, following which it had been established that the three caravans were not in use. However, a fourth caravan was installed on the site in September 2019. In response to complaints about works at the site, officers visited in October 2020 and found three static caravans located to the rear of the site with a close boarded fence around them, effectively creating a compound. Furthermore, the caravans appeared to be connected to main services, ie electricity, water and bottled gas and two appeared to be occupied. The landowner had advised officers that the caravans were being used by workers at the pub and the intention was to use them as additional accommodation in order to support the viability of the pub. On 13 November 2020, a PCN was served, asking for information on matters including the ownership of the caravans, when and why they had been moved, the services attached and their use, with a deadline for return of 4 December 2020. Following comments by the landowner, including questioning the legality of the PCN, the deadline for response was extended to 4 January 2021. As no response was received, a final letter giving a further seven days was sent on 7 January 2021. A response was finally received on 11 January, attaching a copy of the PCN but with incomplete responses and the landowner was afforded another opportunity to complete, with a deadline of 15 January 2021. A further response was received on 13 January but did not include the requested information and there had been no further correspondence to date.

A member commented that he understood caravans to have been on site for some time, possibly 15 years according to landowner, and questioned if they had left the site completely or just been moved around the site. He suspected the whole pub to be the planning unit and if the caravans had been moved around the site but been present for 15 years, the authority probably had no enforcement rights over the caravans. The HoP confirmed that the caravans had been moved off the site in 2016 so there had been a period where there were no caravans on site. The member responded that he was in favour of the authority taking action and was confident that the landowner shouldn't be doing what he was doing but questioned what the end result would be and what the authority wanted to achieve on this site and how



to manage a difficult situation. The solicitor advised that expediency was key and once all the information had been received on the PCN and it had been properly responded to, members could be updated accordingly.

Another member questioned if it had been made clear when the PCN had been served that the authority was trying to engage constructively with the landowner and move forward and whether the process became more officious from this stage forward. The HoP responded that the first actions would be to engage a solicitor and prepare a Summons for prosecution for failing to respond to the PCN. That action sometimes prompted a response. The Authority would write to the landowner, advising them a solicitor had been engaged and what would happen next. If they came back with full and comprehensive information, then clearly this would be considered.

In assessing what action to take, members took into consideration the purpose of a PCN and the importance of complete and accurate information in the investigation of planning breaches, together with the penalties for failing to respond or knowingly providing false or misleading information. Members acknowledged the number of attempts made to obtain the required information from the landowner, including extended deadlines and concluded it was apparent that he did not intend to respond. Therefore, instigating prosecution proceedings would be an appropriate way forward.

Bill Dickson proposed, seconded by Andree Gee, and

**It was resolved unanimously to authorise the commencement of prosecution proceedings in respect of non-compliance with a Planning Contravention Notice.**

## 9. Enforcement update

Members received an update report from the Planning Officer (Compliance and Implementation) on enforcement matters previously referred to the Committee. Further updates were provided for:

**former Marina Keys, Gt Yarmouth:** site had been sold in October 2020 which had resulted in work being held up on the completion of discharge of conditions on a related application but it was now nearly all completed. The site would be cleared in the next week or two.

**land at the Beauchamp Arms PH:** see item 8(2)

**Blackgate Farm, High Mill Road, Cobholm:** the hearing scheduled for 9 February had been cancelled and rescheduled by the Planning Inspectorate to 20 July 2021.

**land east of North End, Haddiscoe:** Enforcement Notice served 12 January, taking effect from 12 February with compliance date for completion of works as 12 May 2021

**Brograve Marshes, Waxham:** Enforcement Notice served 29 January, taking effect from 3 March with a compliance date of 31 August 2021.

The Committee adjourned at 11.34am and reconvened at 11.45am when Vic Thomson was no longer present.



## 10. Greater Norwich Local Plan Regulation 19 consultation

The Committee received a presentation by Mike Burrell, Greater Norwich Planning Policy Manager on the Greater Norwich Local Plan Regulation 19 consultation. This was the stage where representations on the soundness and legal compliance of the GNLP Strategy and Sites Documents and evidence could be made. Consultation would run from 1 February to 15 March 2021. The GNLP would replace the Joint Core Strategy and many site allocations on adoption.

Leslie Mogford joined the meeting at 11.55am.

The Chair thanked Mr Burrell for his comprehensive presentation, noting the ambitious plans.

A member referred to the growth of tourism, particularly key for the Broads area, and the importance of reducing the overall carbon footprint, particularly cars, and questioned if the plan included improvements to transport infrastructure. Mr Burrell responded that local planning authorities did not provide key improvements but reflected them, referring to the Railways Plans and Norfolk Local Transport Plans, which Norfolk County Council was working on in parallel with sustainable transport methods in and around Norwich and market towns.

A member referred to the visitor pressure levy and questioned if this would be charged against houseboats. Mr Burrell responded that he did not believe so but the details had yet to be established. The Strategy would identify the need for that based on evidence county wide.

Gail Harris left the meeting at this point.

Members noted the offer by Mr Burrell to provide an update with another presentation, the most appropriate stage being following the Inspector's questions and before the Examination, likely to be towards the end of the year.

## 11. Adopting the Residential Moorings Guide

The Planning Policy Officer (PPO) introduced the report, which proposed a final draft of the Residential Moorings Guide for recommendation to the Broads Authority for adoption.

A member thanked officers for all their hard work in preparing the Guide, considering it a very important move forward and would regularise houseboat living. However, he considered that the Guide could go a lot further. Purpose-built houseboats could be very elegant structures and could enable places in the Broads to be capitalised with houseboats located away from the main areas of navigation and would help with finding accommodation for people in need. He felt that riverside communities could be an attractive feature, citing Seattle as a good example as well as Amsterdam which attracted tourists to those areas and the Authority could even use redundant land to encourage new innovative design for purpose built houseboats and office spaces.

Another member endorsed these comments, commenting that there had been some disparagement about houseboats in the past and that there was very little positive mention in



the Authority's planning policies. He agreed that they could be extremely attractive and meet a demand. Furthermore, floating accommodation would be a sensible way of building houses and other structures in areas prone to flooding. He concluded that he would like to see the Authority undertake a piece of work on encouraging the principle of living and working afloat.

Tim Jickells proposed, seconded by Leslie Mogford, and

**It was resolved unanimously to endorse the final draft Residential Moorings Guide and recommend it to the Broads Authority for adoption.**

## 12. Consultation documents update and proposed response

The Planning Policy Officer (PPO) introduced the report, which provided a proposed response to consultations by East Suffolk Council on its Draft Historic Environment Supplementary Planning Document and Suffolk County Council on its Suffolk Design Guide for Streets.

Melanie Vigo di Gallidoro proposed, seconded by Bill Dickson, and

**It was resolved unanimously to note the report and endorse the proposed responses.**

## 13. Heritage Asset Review Group – notes of meeting

The Committee received the notes of the Heritage Asset Review Group meeting held on 18 December 2020.

**The report was noted.**

## 14. Appeals to the Secretary of State

The Committee received the latest schedule of appeals to the Secretary of State since January 2020. The Senior Planning Officer advised that, as reported in item 9, the hearing date for Black Gate Farm had been rescheduled as the Planning Inspector wanted to undertake an accompanied site visit. In addition, the hearing for Barn Mead Cottages had been postponed due to the personal circumstances of the appellant and this would now take place on 27 April 2021. Finally, a decision was awaited for Gunton Lodge.

**The report was noted.**

## 15. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 14 December 2020 to 22 January 2021 and Tree Preservation Orders confirmed within this period.

**The report was noted.**

## 16. Date of next meeting

The next meeting of the Planning Committee would be on Friday 5 March 2021 at 10.00am.



The meeting ended at 12:35pm

Signed by

Chairman



## Appendix 1 – Declaration of interests Planning Committee, 05 February 2021

Member	Agenda/minute	Nature of interest
Gail Harris and Lana Hemsall	10	Local authority appointees to the Greater Norwich Development Partnership
James Knight	11	Director of a company involved in waterside development
Vic Thomson	8.2	Within his Division but had not had any involvement in the matter.



# Planning Committee

05 March 2021

Agenda item number 8.1

## BA 2021 0028 FUL Whitlingham Country Park Construction of toilet block

Report by Planning Officer

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### Proposal

Replace temporary toilet facility

### Applicant

The Whitlingham Charitable Trust

### Recommendation

Approve subject to conditions

### Reason for referral to committee

Broads Authority's Chief Executive is a Board Member of the Whitlingham Charitable Trust

### Application target date

26.03.2021

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## Contents

1.	Description of site and proposals	2
2.	Site history	2
3.	Consultations received	2
4.	Representations	3
5.	Policies	3
6.	Assessment	3
7.	Conclusion	5
8.	Recommendation	6
9.	Reason for recommendation	6
	Appendix 1 – Location map	7



## 1. Description of site and proposals

- 1.1. The application site is within the car park area of the Whitlingham Country Park to the east of the café and visitor centre, to the south of Whitlingham Great Broad and to the north of the entrance to Whitlingham Broad Campsite. By road the site is accessed from Whitlingham Lane to the car parks which surround the application site and the edge of the Broad. The site is accessed by the National Cycle Network route 1 which links to Norwich to the north west and Loddon to the south east. By foot there are extensive footpath routes to the site from Norwich, Postwick and local areas.
- 1.2. Currently on site is a temporary building which has functioned as public toilets since temporary planning permission was granted in 2014 (ref. BA/2014/0204/FUL) for a period of three years. This was subsequently extended by permission for a further 3 years (ref. BA/2018/0177/FUL). The existing building measures 8.5m x 3m with a flat roof with a maximum height of 2.5m. Attached to the north elevation is a timber access ramp which measures the full length of the building and is approximately 1.3m wide.
- 1.3. Planning permission is sought for the replacement of this temporary public toilet block with a permanent building. The building is proposed to be of timber frame construction with a pitched roof covered in clay pan tiles with feather edged timber cladding and a access ramp located on the north elevation.
- 1.4. The building would be located in the same position as the current structure, but is proposed to be slightly larger at 8.8m long by 4.5m wide. The access ramp would be covered by the roof which would oversail giving some shelter for this area. The roof, as proposed, would be taller than the current roof with a ridge height of 3.93m. The eaves from ground level would be 2.5m which is approximately the same height as the highest point of the existing building's flat roof.
- 1.5. The layout of the public toilets would provide separate male and female toilet blocks (3 WC cubicle in the female block, and 2 WC cubicle male block) and a separate wheelchair accessible unisex WC. This room is shown as being 2.0m by 1.5m. Separately and accessed from the east side elevation is a small plant/services room.
- 1.6. The current design shows an access ramp is 1.1m wide, 3.5m long, at a grade of 1 in 10.

## 2. Site history

- 2.1. Whilst there is extensive planning history for the Whitlingham Country Park site, the most relevant planning permissions are BA/2014/0204/FUL and BA/2018/0177/FUL which are temporary planning permissions and the latter of the two is about to expire. This has resulted in this application being submitted for a permanent replacement.

## 3. Consultations received

### Parish Council

- 3.1. No objection



District Member

- 3.2. District Member- This application can be treated as a delegated decision.

South Norfolk Council Community Protection and Environmental Quality team

- 3.3. Having considered the application documentation along with the nature and location of this proposal, we have no comments to make regarding this application.

Norfolk County Council (NCC) Highways

- 3.4. No objection

Norfolk County Council Historic Environment Services

- 3.5. No objection

Broads Authority Ecology

- 3.6. No objection subject to 2 conditions to ensure the protection of bats and potential nesting birds.

BA Historic Environment Manager

- 3.7. No objection

## 4. Representations

Broads Society

- 4.1. Support the application

## 5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).

- 5.2. The following policies were used in the determination of the application:

- DM2 - Water Quality and Foul Drainage
- DM4 - Water Efficiency
- DM6 - Surface water run-off
- DM11 - Heritage Assets
- DM16 - Development and Landscape
- DM43 - Design
- DM44 - Vis. and Com. Facilities and Services
- WHI1 – Whitlingham Country Park

## 6. Assessment

- 6.1. The key consideration is the principle of development, design and appearance of the building and any impact upon the landscape and historic buildings, and accessibility of the replacement building. Other issues will also be covered by this report.



## Principle of development

- 6.2. There has been a public toilet building here since 2014, prior to which the only toilets on the site were in the flint barn which is used as a visitor centre. There is a identified need to maintain this provision, which is supported in principle by policy DM44 parts c), d), e) and f) of the Local Plan for the Broads. The previous temporary planning permissions have accepted the need for a public toilet facility, but have not allowed the permanent retention of the existing pre-fabricated building as it does not contribute positively to the character or appearance of the area.
- 6.3. The construction of a more suitable building as a permanent replacement is supported in principle as the proposal meets criteria of Policy WH11 of the Local Plan for the Broads. The Highways Authority has not objected to this application or previous schemes, and whilst the current area was formerly car parking, the use of this area for public conveniences is justified as it is a limited area and the displacement of parking can be accommodated within the numerous car parks elsewhere on site. It is not a facility which would give rise to additional vehicular traffic, and does not have a detrimental impact upon the quiet enjoyment of the area.

## Design

- 6.4. The park is located to the south-east of Norwich and is located within the Broads Authority area, an area of equivalent status of a National Park. Both National and Local Planning Policies, including WH11 a) and DM43 d) and e) of the Local Plan for the Broads, are clear in outlining that proposals should help protect the special qualities of the area and any new development should be of a high standard and quality of design. The current temporary toilet block and the proposed permanent replacement in the same location are in relatively close proximity to the historic barn which is used as a visitor centre. The barn is considered a locally identified heritage asset and the toilet block is also within the wider setting of the grade II listed remains of Trowse Newton Hall.
- 6.5. The proposal is for a timber-framed structure, with timber cladding and a pantile roof. This is considered to be a significant improvement on the design and appearance of the current facilities and will serve to enhance the character and appearance of the area as well as providing improved facilities for the visitors to the park.
- 6.6. The separation to the flint barn and the screening by the hedge and location within the car parking area result in this proposal having an acceptable impact upon the landscape, and setting of the heritage assets. On this basis the proposal is considered acceptable when considered against Policy DM43, DM16 and WH11 of the Local Plan for the Broads.

## Accessibility

- 6.7. The current proposal has a similar footprint and layout to the temporary building. Whilst this has been functional as a temporary facility, it does not meet current building regulations requirements. The new building would be permanent and therefore the facilities would need to comply with the most up to date Building Regulations. These



regulations are often sensible guides as how to best layout a space for a particular function.

- 6.8. The current proposal has followed the floor plan of the existing building, including a wheelchair access ramp, level access and an individual disabled WC. However, there may be a requirement to make changes to the layout to meet current regulations and this is still under discussion. If the Building Regulations cannot be met by the current design, or the facilities could be slightly improved through minor changes such as having a shallower access ramp, larger wheelchair accessible WC or other adaptations, it will be necessary to make amendments to the scheme. Members will be updated verbally at the meeting.

### Other issues

- 6.9. The site is located in the Environment Agency's specified Flood Zone 1. The development is raised slightly from ground level and the use of the building is considered appropriate in this location. On this basis the proposal is considered to accord with Policy DM5 of the Local Plan for the Broads.
- 6.10. The site is an important habitat for bats and birds and therefore two conditions have been proposed by the Authority's ecologist to protect these species during the construction phase. However, considering the nature of this part of the site, the current building on site and the proposed construction, there are no identified adverse impacts related to this development, and any minor impacts would be controlled and mitigated through conditions relating to bird checks if construction takes place during the nesting/breeding season for birds, and an alternative roof underfelt is used which does not harm bats should they use the roof space for roosting.
- 6.11. During the construction phase, access should be maintained to Whitlingham Lane and a safe working area maintained excluding visitors from the construction site. Temporary provision for the toilets may be required if the construction phase is likely to take a protracted time. As such, either during the further negotiations, or through the addition of a condition, further details would need to be submitted and approved prior to works commencing on site to protect members of the public, maintain access and also ensure some public toilet facilities are maintained during the construction period.
- 6.12. Waste from the site is pumped directly to the public sewer which is the preferred option in the NPPF's hierarchy of drainage options and therefore complies with Policy DM2 of the Local Plan for the Broads. Details of water efficiency measures have not been included within the application, however further details would be sought by condition or following further negotiation to ensure that the proposal considers the requirements of meeting Policy DM4 (Water Efficiency) for non-residential buildings.

## 7. Conclusion

- 7.1. The proposed replacement of the temporary building with a permanent facility is welcomed and is supported in principle by Policy DM44, DM43 and WHI1 of the Local



Plan for the Broads. Subject to minor amendments to the design or clarification that the current layout is acceptable in terms of accessibility, then the scheme is a good quality and well designed permanent replacement of an important facility. The proposed development would not have any adverse impacts upon the car parking existing on site, the historic buildings and landscape, or local ecology.

## 8. Recommendation

8.1. That the application be approved subject to the conditions listed at 8.2 below. If further amendments are required and have not been received by the date of the meeting, Members are asked to approve the development in principle and to delegate the details to the Head of Planning to approve the application subject to conditions where required, and an amendment to the design and size of the proposed wheelchair accessible WC and access ramp which may include an increase in size of the building if the current scheme would not meet relevant Building Regulations.

### 8.2. Conditions

- Standard time limit and plans conditions
- Sample of exterior materials
- Breeding/nesting bird checks in relevant season
- Variation to roof felt specification to protect bats
- Construction site safety and temporary toilet provision details to be agreed either by condition or submission of additional information prior to determination.
- Biodiversity enhancements where possible in the construction of the building to be agreed either by condition or submission of additional information prior to determination.
- Water efficiency details to be agreed either by condition or submission of additional information prior to determination.

## 9. Reason for recommendation

9.1. The scheme is considered to be in principle acceptable, complies with relevant policy and does not raise any significant material planning considerations apart from the accessibility of the toilets and certain points of detail and these matters are under discussion.

Author: Jack Ibbotson

Date of report: 23 February 2021

Appendix 1 – Location map



Planning Committee, 05 March 2021, agenda item number 8.1





# Planning Committee

05 March 2021

Agenda item number 9

## Enforcement update- 5 March 2021

Report by Head of Planning

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### Summary

This table shows the monthly updates on enforcement matters. The financial implications of pursuing individual cases are reported on a site by site basis.

### Recommendation

To note the report.

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Committee date	Location	Infringement	Action taken and current situation
31 March 2017	Former Marina Keys, Great Yarmouth	Untidy land and buildings	<ul style="list-style-type: none"><li>• Authority granted to serve Section 215 Notices.</li><li>• First warning letter sent 13 April 2017 with compliance date of 9 May.</li><li>• 26 May 2017: Some improvements made, but further works required by 15 June 2017. Regular monitoring of the site to be continued.</li></ul>



Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> <li>• Monitoring 15 June 2017. Further vandalism and deterioration.</li> <li>• Site being monitored and discussions with landowner.</li> <li>• Landowner proposals unacceptable. Further deadline given.</li> <li>• Case under review.</li> <li>• Negotiations underway.</li> <li>• Planning Application under consideration December 2018.</li> <li>• Planning application withdrawn and negotiations underway regarding re-submission.</li> <li>• Works undertaken to improve appearance of building.</li> <li>• Revised planning application submitted 1 April 2019.</li> <li>• Planning Committee 19 July 2019: Resolution to grant planning permission.</li> <li>• Arson at building, with severe damage 18 August 2019.</li> <li>• Discussions around securing building and partial demolition 19 August 2019.</li> <li>• Pre-demolition surveys almost completed and works commence thereafter 24 October 2019.</li> <li>• Works underway to secure and commence agreed demolition. 16 December 2019.</li> </ul>



Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> <li>• Site now sold. New landowner intends to build out with some amendments to be agreed.</li> <li>• New owner asked to demolish building as does not propose conversion 12 February 2020.</li> <li>• Application received to demolish building (and other amendments to scheme) 20 February 2020.</li> <li>• Application approved and demolition almost complete. 24 September 2020.</li> <li>• Demolition completed and site almost cleared. November 2020</li> <li>• <b>Final inspection needed.</b></li> </ul>
14 September 2018	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravans	<ul style="list-style-type: none"> <li>• Authority given to serve an Enforcement Notice requiring the removal of unauthorised static caravans on land at the Beauchamp Arms Public House should there be a breach of planning control and it be necessary, reasonable and expedient to do so.</li> <li>• Site being monitored.</li> <li>• Planning Contravention Notices served 1 March 2019.</li> <li>• Site being monitored 14 August 2019.</li> <li>• Further caravan on-site 16 September 2019.</li> <li>• Site being monitored 3 July 2020.</li> </ul>



Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> <li>Complaints received. Site to be visited on 29 October 2020.</li> <li>Three static caravans located to rear of site appear to be in or in preparation for residential use. External works requiring planning permission (no application received) underway. Planning Contravention Notices served 13 November 2020.</li> <li>Incomplete response to PCN received on 10 December. Landowner to be given additional response period.</li> <li><b>Authority given to commence prosecution proceedings 5 February 2021</b></li> <li><b>Solicitor instructed 17 February 2021</b></li> </ul>
8 November 2019	Blackgate Farm, High Mill Road, Cobholm	Unauthorised operational development – surfacing of site, installation of services and standing and use of 5 static caravan units for residential use for purposes of a private travellers' site.	<ul style="list-style-type: none"> <li>Delegated Authority to Head of Planning to serve an Enforcement Notice, following liaison with the landowner at Blackgate Farm, to explain the situation and action.</li> <li>Correspondence with solicitor on behalf of landowner 20 November 2019.</li> <li>Correspondence with planning agent 3 December 2019.</li> <li>Enforcement Notice served 16 December 2019, taking effect on 27 January 2020 and compliance dates from 27 July 2020.</li> <li>Appeal against Enforcement Notice submitted 26 January 2020 with a request for a Hearing. Awaiting start date for the appeal. 3 July 2020.</li> </ul>



Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> <li>• Appeal start date 17 August 2020.</li> <li>• Hearing scheduled 9 February 2021.</li> <li>• <b>Hearing cancelled. Rescheduled to 20 July 2021.</b></li> </ul>
4 December 2020	Land to east of North End, Thorpe next Haddiscoe	Unauthorised change of use to mixed use of a leisure plot and storage.	<ul style="list-style-type: none"> <li>• Authority given for the service of Enforcement Notices.</li> <li>• Section 330 Notices served 8 December 2020.</li> <li>• Enforcement Notice served 12 January 2021 with compliance date 12 February 2021.</li> </ul>
8 January 2021	Land east of Brograve Mill, Coast Road, Waxham	Unauthorised excavation of scrape	<ul style="list-style-type: none"> <li>• Authority given for the service of Enforcement Notices.</li> <li>• <b>Enforcement Notice served 29 January 2021</b></li> <li>• <b>Appeal against Enforcement Notice received 18 February 2021</b></li> </ul>

Author: Cally Smith

Date of report: 22 February 2021



# Planning Committee

05 March 2021

Agenda item number 10

## Tree in Oulton Broad Conservation Area- Prosecution

Report by Kate Knights, Historic Environment Manager

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### Summary

The Broads Authority are aware that there has been wilful damage to a tree in Oulton Broad Conservation Area. The Local Planning Authority is minded to prosecute the perpetrator and approval to do so is sought from the Planning Committee.

### Recommendation

That members authorise the commencement of prosecution proceedings in respect of wilful damage to a protected tree.

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## 1. Introduction and legal background

- 1.1. An effective enforcement service is a fundamental part of the planning system. It ensures compliance both with planning law and planning conditions, investigates and resolves planning breaches and, where necessary, instigates direct action or prosecution in order to achieve compliance. The latter are usually remedies of last resort. The National Planning Policy Framework states at paragraph 58 that “Effective enforcement is important to maintain public confidence in the planning system” and the law gives a Local Planning Authority (LPA) a wide range of powers that it can use in the discharge of its enforcement duties.
- 1.2. Within a Conservation Area, it is a legal requirement for the LPA to be given six weeks’ prior notice of works to any trees within that area. There is a simple formal process for this, whereby the landowner submits a section 211 Notice to the LPA. The purpose of this notice is to give the LPA the opportunity to consider whether a Tree Preservation Order should be made in respect of the tree. If the tree is not considered worthy of a TPO the LPA must allow the works, although it can seek to negotiate amendments if needed.
- 1.3. Anyone who cuts down, uproots, tops, lops, wilfully destroys or wilfully damages a tree in a Conservation Area without submitting a section 211 Notice is guilty of an offence.



## 2. Damage to beech tree at Westerley, Broadview Road, Oulton Broad

- 2.1. The tree in question is a mature beech tree situated at Westerley on Broadview Road, Oulton Broad, Lowestoft. It is positioned at the north east of the site close to the road and no. 33 footpath which passes the site. It is situated within the Oulton Broad Conservation Area. The Oulton Broad Conservation Area Appraisal says of Broadview Road:

‘Mature trees within the gardens and on the roadsides make a positive contribution to the character of the area, providing a backdrop to unify the contrasting styles and scales of development on the north shore...’.

- 2.2. Pre-application discussions have been ongoing for a number of years regarding a replacement dwelling at Westerley and a new dwelling on the adjoining plot known as The Moorings, which is in the same ownership.
- 2.3. As part of these negotiations, there has been discussion about the significance of the view of Oulton Broad from Broadview Road and footpath 33 and the retention of this view.
- 2.4. In November 2020, a planning application (BA/2020/0408/FUL) was submitted for the replacement dwelling and a new dwelling. The application included the removal of the beech tree in order to achieve the applicant’s preferred layout on the plots. The Authority’s Arboricultural consultant raised an objection to the tree’s removal. Following further negotiations, the applicant amended the drawings to show the tree being retained and submitted this revision on 21 December 2020.
- 2.5. Having received the amendments, the Arboricultural consultant carried out another site visit on 18 January 2021. He concluded that the beech tree is a mature specimen in good condition. The tree overhangs the adjacent footpath and is clearly visible from Broadview Road, the footpath and Oulton Broad and so makes an important contribution to the character of the Conservation Area.
- 2.6. In the course of his inspection, however, he discovered that 3 holes had been made in the tree trunk, which appeared to have been made with a drill. The holes had had fungal pellets inserted into them and were plugged with twigs. An unknown fungus was growing out of some of the holes.
- 2.7. Following discussions with officers, he made another site visit on 21 January 2021 at which he undertook a full survey of the tree, including a Tree Evaluation Method for Preservation Orders (TEMPO) assessment to consider the tree’s suitability for a Tree Preservation Order (TPO). At this visit he discovered that there were actually 15 holes drilled into the tree and that 5 of the holes had mushrooms growing from them. He attempted to move one of the pellets from a hole where large clusters of fungi were present and could not. However, not all of the holes had pellets within them.



- 2.8. The conclusion of the TEMPO assessment was that the tree was of sufficient quality to justify protection and a provisional TPO was served on 26 January. The Arboricultural consultant advises that the ultimate extent of the potential damage to the tree caused by the fungi is not quantifiable at this stage, but the TPO emphasises the significance of the tree, provides further protection and also protects the LPA's position should a replacement be required in the future.
- 2.9. It is clear from the survey that there has been deliberate damage to the tree and officers have been in touch with the landowner. In a telephone conversation on 21 January 2021 the landowner admitted carrying out the works early in 2020. Officers wrote to confirm the details of the conversation, and the following confirmation was received from the landowner on 22 January:
- "I take full responsibility for my actions over my treatment of T7 [the beech tree] starting early last year before the first lock down and the ending with the removal of the plugs in that Summer; as I reflected to correct the situation. My actions were foolish and ill-considered at the time and I apologise for it. I have no excuse by my actions in addressing a conundrum..."
- 2.10. The landowner goes on to state that the reason for wanting to remove the tree was in order to create a clear view between the two properties (ie the replacement and new dwellings) which, he felt, would be of benefit to the neighbour to the east of the plot and walkers. The landowner was asked about the type of fungus contained in the pellets, but the agent has confirmed that they are not able to provide this information.

### 3. Action proposed

- 3.1. The law states that anyone who carries out works to a tree in a Conservation Area without giving the requisite notice to the local authority is guilty of an offence. It is clear from the survey of the tree and the correspondence with the landowner that there has been wilful and deliberate damage caused to the tree, with the explicit purpose of causing it to fail.
- 3.2. The Broads Authority as the LPA has a number of duties in regard to this matter. Firstly, it has a duty to protect the Conservation Area which it has designated; secondly it has a duty to protect the trees within the Conservation Area and determine what works are appropriate; and thirdly, it has a duty to protect the planning system and the procedures established in law.
- 3.3. With regard to the first two duties, the trees within the Conservation Area contribute generally to its character, whilst this particular beech tree, by virtue of its prominent location and maturity, contributes both to the character of the wider Oulton Broad Conservation Area and in particular to the public amenity in this area through its visual amenity and ecology.
- 3.4. With regard to the protection of the planning system and the legal process, a distinction can be drawn between public and private benefits. The amenity value of the



tree and its contribution to the Conservation Area are public benefits which the LPA should protect in the public interest. The actions which have occurred were undertaken with the purpose of securing the removal the tree over time. The landowner claims that this was in order to improve the view for the community, but the LPA considers it more likely that the reason was to remove the impediment to his development ambitions, as without the tree his preferred layout could be achieved. There are also other benefits to the landowner arising from the removal of the tree, for example an easier build without the impediment of root protection areas or the requirement to protect roots when constructing parking areas, less shading of the dwelling and less leaf fall and debris over the parking area and garage. If this is the case, then in damaging the tree the owner of the site was seeking private gain at the expense of the public benefits afforded by the tree.

- 3.5. It is considered that there is a strong justification for a prosecution in this case. It is evident what works have taken place, and it is clear that these were wilfully and deliberately undertaken by the landowner with the purpose of damaging the tree in order to achieve its removal. Whatever the explanation given for this - whether it was to improve the view for a wider audience, as claimed by the landowner, or to address development constraints, as suspected by the LPA – the actions were unlawful.
- 3.6. The LPA has a duty to uphold the planning system and it should take action where there has been a deliberate breach, particularly where this has caused significant damage to interests of public importance. In this case, there has been harm to the Conservation Area as a whole, harm to this particular tree and, if not remedied, harm to the integrity of the planning and legal processes. It is proposed that the LPA commence prosecution proceedings against the landowner for wilful damage to a protected tree.

## **4. Financial implications**

- 4.1. There will be a financial cost associated with a prosecution. Legal costs to bring a prosecution are estimated at £1,200, but the final cost will be dependent on how the matter proceeds, including whether or not there is a guilty plea. The need for further legal advice regarding the ongoing monitoring of the tree and its potential replacement will also incur costs.
- 4.2. The LPA would seek to recover some of its costs through the Court.

## **5. Risk implications**

- 5.1. There are reputational risks arising from the LPA failing to take action where there has been unauthorised damage to a tree.

## **6. Recommendation**

- 6.1. That members authorise the commencement of prosecution proceedings in respect of wilful damage to a protected tree.



Author: Kate Knights

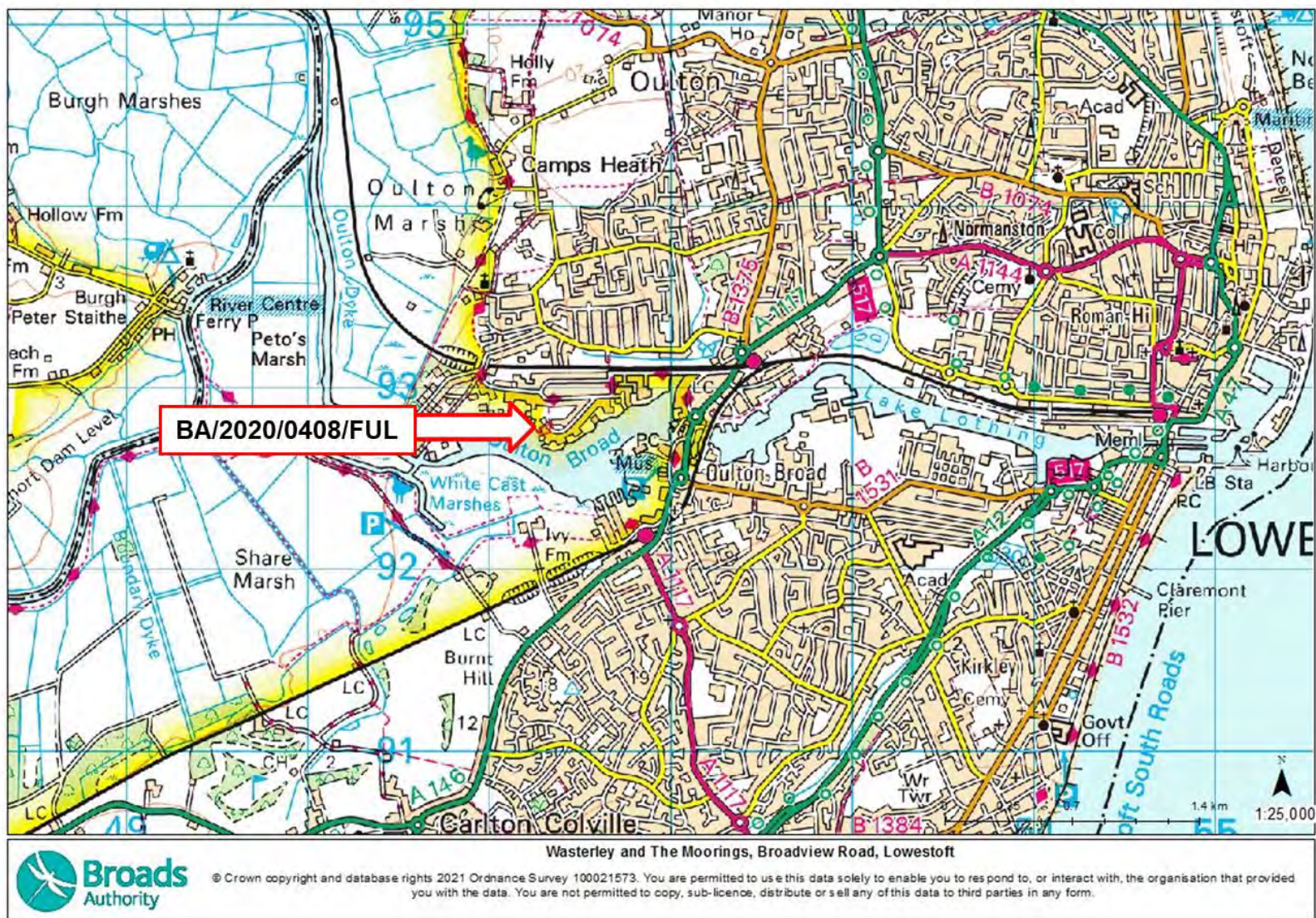
Date of report: 22 February 2021

Appendix 1 – Location map

Appendix 2 – Existing and Proposed layout for development of The Westerley and The Moorings (submitted 21 December 2020)



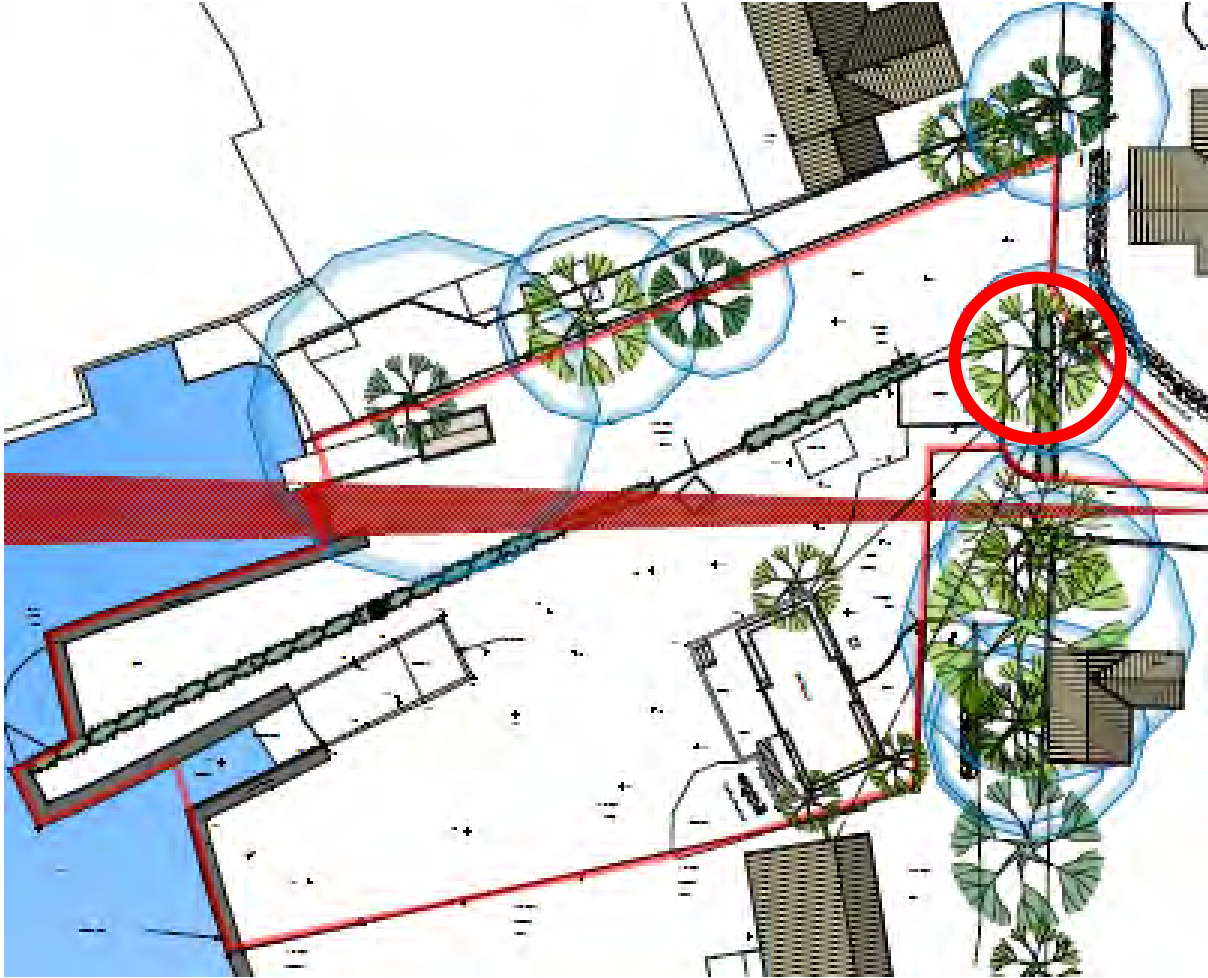
## Appendix 1 – location map





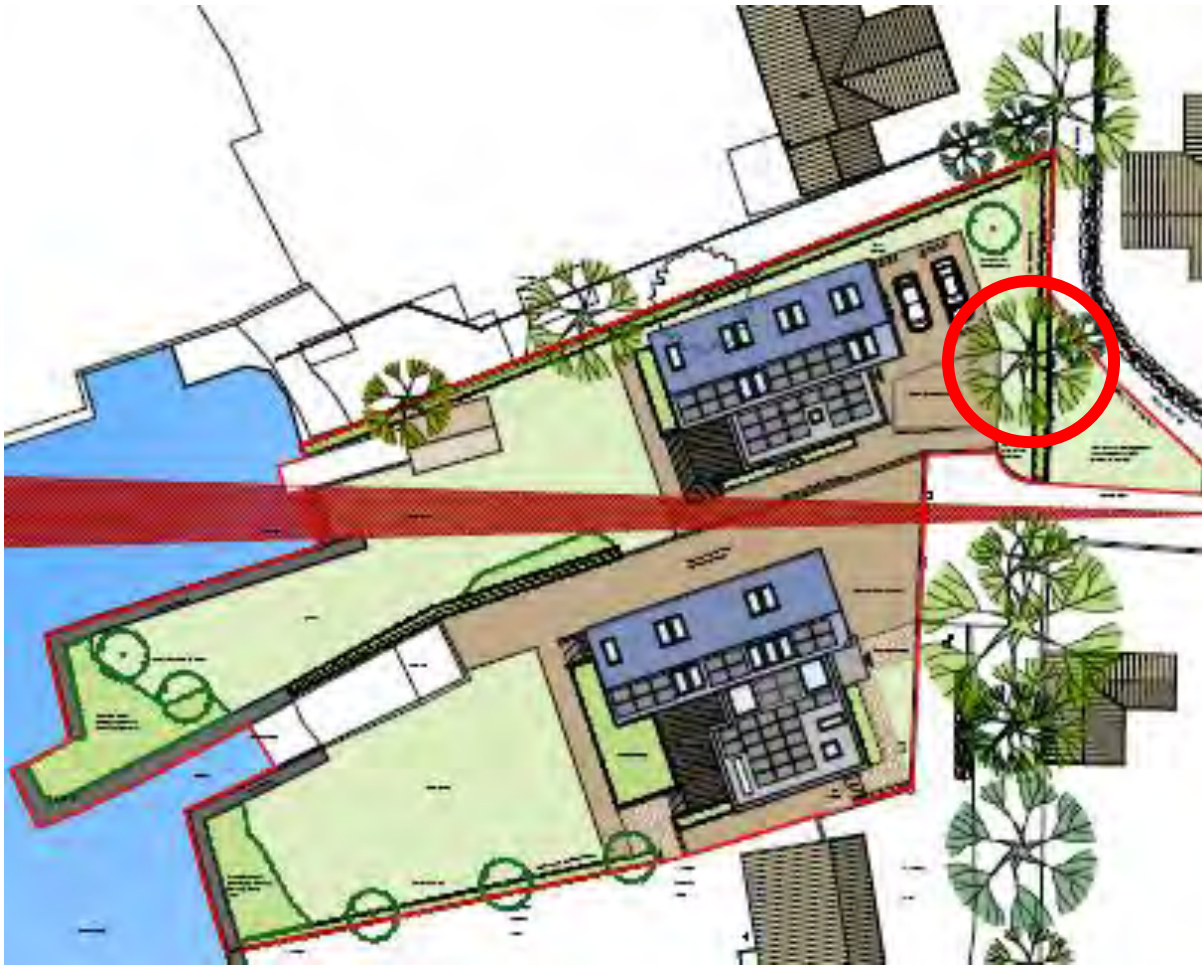
## Appendix 2

### Existing Plan





## Proposed Plan





# Planning Committee

05 March 2021

Agenda item number 11

## Adopting the Peat Guide

Report by Planning Policy Officer

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### Summary

The adopted Local Plan for the Broads includes a policy that seeks a reduction in the amount of peat that is excavated as part of a development proposal. A Peat Guide has been produced to elaborate on the policy and help with its implementation. The draft Guide was subject to consultation between September and November 2020.

### Recommendation

To endorse the Peat Guide and recommend it to the Broads Authority for adoption.

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## 1. Introduction

- 1.1. The Local Plan for the Broads includes a policy that seeks a reduction in the amount of peat that is excavated as part of a development proposal. If peat is excavated, the policy requires that the special characteristics of the peat are assessed, recorded and considered when disposing of it. A Peat Guide has been produced to elaborate on the policy and help with its implementation. It is a tool to assist potential applicants and others who may be considering development on peat.
- 1.2. The guide was subject to consultation between September and November 2020.

## 2. Consultation responses

- 2.1. The responses to the draft Peat Guide are at Appendix 1. Some of these comments resulted in changes to the final guide.

## 3. Final version for adoption

- 3.1. The proposed amendments to the final Peat Guide are at Appendix 2. Additions are shown as blue underline and removals as red strikethrough.
- 3.2. Members are asked for their views on the final draft guide, and to endorse the guide and recommend it to the Broads Authority for adoption.



Author: Natalie Beal

Date of report: 22 February 2021

Appendix 1 – First Draft Peat Guide - responses to consultation

Appendix 2 – Final Draft Peat Guide – for adoption with changes marked



Ref	Name	Organisation	Comment	BA response	Amendments
#1	Matt Layt	Individual	I am sorry to jump onboard on someone else’s email but I was recently forwarded an email which was sent to the Brundall riverside road committee regarding the broads authority consultation on dredging and reducing peat extraction on the Norfolk broads. In brief I am Norfolk born and bred and run a small business on the Norfolk broad specialising in piling and dredging. We have a good base of clients including private residents the commercial sector and even yourselves. Although our business is 75% piling the dredging side is a part of the business I would like to grow and we have recently taken delivery of our 2nd dredger. To be honest the job is hard enough with the guidelines we have to work within ie the dredging in one mechanical motion and only being able to build land up a small amount and removing dredging’s off site is another mine field. Being from a family where my dad had a boatyard(brundall based) for 30 years I have seen the boatyards slowly die off one by one and riverside estate slowly turn into a series of marinas which is not a problem in anyway and can only be seen as forward step and a positive one for work and for the Norfolk broads in general. My point to which I am getting at is 30/40 years ago the vast majority of river craft were hire boats and had a draught of 2’6” to 3’ maximum but with the evolution of larger private craft we now need around 4’ on a low tide to accommodate around 80% of the boats moored in brundall. Other contractors don’t tend to dredge brundall anymore with goodchilds not really concentrating in that area of expertise any more(Alan’s words) and John bell the only other contractor and the (only) one which has a waste transfer site via grandfathers rights dating back to the may gurney days doesnt like to do much dredging now and doesn’t like to come down hoborough’s dyke at all. This leaves myself Broadwurx piling and dredging who is happy to do the work but has no where to put the dredgings even if I was to buy my own bit of marshland the same as John bells there is no way I can put dredgings on it as said by the broads authority. I would be interested to hear back from yourselves to see what the way forward is and how the bigger boats will use the Norfolk broads when most yards are not deep enough to accommodate and where peat diggings and silt differ in what can and can’t be excavated. And to see if I could come and look at the videos mentioned in your email to the riverside committee.	This comment is about dredging. Dredging is about accumulated silt and not excavating peat. We have responded to Mr Layt separately. So if dredging an existing waterway, that should be accumulated silt. But if the work makes a mooring cut for example wider, then that could be relevant to the peat policy (if the area is peat).	No change to guide.
#2	Matt Shardlow	Individual	It's a small point but early in the Peat Guide it says that peat 'can' be developed on in the Broad. 'Can', like 'may' can have two meanings. Perhaps better to be explicit, something like - 'there are circumstances where development on peat soils in the Broad may be necessary'. Sets a clearer tone. Otherwise, it looks great - does the whole document become supplementary planning guidance when agreed with the new policy part of the Broad's planning policy?	Noted and agreed. Will amend the guide.	In the Broad, development <del>can take place in areas where peat might be</del> <u>on occasion may</u> be proposed that <del>developed on,</del> <u>can affect peat because it is</u> excavated or removed, <u>or actually developed on</u> .
#3	Sarah Luff	LLFA, Norfolk County Council	In point iv. of section 6.4.1, the guidance indicates that this is a change in the way of working for contractors and place the onus on the developer to inform the contractor. However, it is important that the Broad's Authority provides information and makes the contractors aware of this approach change as this will support the developer in requesting this new approach to be applied.	Noted. We will consider running a session for contractors. Please also note, that applicants often ask us for free pre-application advice, before they plan schemes. So this information, and other policy requirements, can be provided.	No change to guide.
#4	Sarah Luff	LLFA, Norfolk County Council	In section 6.4, the use and redistribution of peat arising is discussed. However, the preference order appears to indicate that peat should be offered to offsite organisations for agricultural reuse before exploring the potential for neighbours to use the arising. This appears to be at odds with the preferred approach of retaining and distributing the peat arisings appropriately onsite. Please could the prioritisation be re-considered or clarification provided?	Agreed.	Move 6.4.3 to before 6.4.2.
#5	Sarah Luff	LLFA, Norfolk County Council	The organisation mentioned specifically in point ‘r’ within the box have not previously been highlighted within the guidance.	Mentioned in para 2 of 6.4.3	No change to guide.



#6	Sarah Luff	LLFA, Norfolk County Council	<p>In section 6.4.1 there is guidance on the relocation of peat within the site with the preference for the use of low areas of potentially wet ground being given the priority. We would like to remind you of the need to retain flood storage areas as there is the potential for flood storage infill. Please can you include further information relating to the assessment and prevention of flood storage loss and the associated consenting process for both ordinary watercourses and main rivers? Further information on the need for ordinary watercourse consenting is available online at <a href="https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management">https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management</a>.</p> <p>Follow up: In section 6.4.1, there is guidance on the relocation of peat within the site with the preference for the use of low areas of potentially wet ground being given the priority. We appreciate the need to keep the Peat wet and local to the point of arising and we support the good intentions that it is founded upon. However, should these “hollows” and “backfill areas” be within the 1% AEP (1 in 100 year) floodplain for the associated watercourse, then there would be an active loss of the flood storage area. The NPPF Guidance on Flood Risk and Coastal Change has emphasised that floodplain storage should be retained both on an individual and cumulative basis (See extract below from <a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-risk-raised-by-minordevelopments">https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-risk-raised-by-minordevelopments</a>).</p>	<p>In terms of small schemes, like moorings cuts, backfilling or filling in lower areas will not have a significant impact on flood risk. We sought advice from the EA: 'There should be compensatory flood storage provided for any deposition of peat within the flood zones. However the volumes generated from a new or extended mooring cut are relatively small compared to the large Broads floodplains. And therefore the offsite impacts are likely to be very small indeed, fractions of a millimetre increase in flood levels. Also the Broads land is often sinking, so any raising is often just reinstating what used to be present. Therefore we would not usually require compensation as the impacts are minimal. Also in the Broads it is often not possible for level for level compensation to be achieved as there is no higher land to lower. The alternative may be to remove the spoil from the floodplain, however instead we usually require it to be spread thinly and a calculation as to the offsite impacts carried out. Especially if there are negative impacts of it being removed from the floodplain as seem to be indicated. If the calculation shows very insignificant impacts then we will not object and ask the LPA to determine if it's ok, taking into account the cumulative impacts. In terms of the cumulative effect, as the impacts are usually so small you would require a lot of mooring cuts for any appreciable effects to be felt. We also feel that this is an appropriate pragmatic response for small-scale water compatible development'.</p>	<p>Make this change: <a href="#">1.1. Flood risk</a> <a href="#">When considering how to dispose of peat, in line with this guide, the impact on flood risk will need to be considered. For example, when backfilling or placing the peat in sunken areas, how will that affect flood storage? The EA have advised that for a smaller scheme, such as a mooring cut, the impact on flood storage will be negligible. But for larger schemes, the flood risk impact of where you dispose of the peat will need to be calculated and mitigated.</a></p>
#7	Sarah Luff	LLFA, Norfolk County Council	<p>This is further supported in the Environment Agency's guidance for the preparation of a Flood Risk Assessment in Flood Zone 2 or 3 (<a href="https://www.gov.uk/guidance/flood-riskassessment-in-flood-zones-2-and-3">https://www.gov.uk/guidance/flood-riskassessment-in-flood-zones-2-and-3</a>) as shown in the extract below. Furthermore, it should be noted that inappropriate development in these floodplain areas should be actively avoided unless the exception test can be suitably passed (Chapter 14 of NPPF <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf</a>). Should a development occur in the floodplain that causes a reduction in the flood storage, then compensation on a level for level, volume for volume basis is required. This means that any loss of flood storage must be compensated for by the reduction in level of nearby ground, such that the same volume is available at every flood level before and after the works and it can freely fill and drain. In other words, in order to mirror the existing situation for a particular flood, each stage (or level) is provided with the same storage volume, cut and fill must equate on a level for level basis, i.e. at each level (say at 0.2 metre vertical intervals for example) the excavated and filled volumes are equal. The timing at which the storage effect comes into operation is significant. If this volume is reduced for any stage of a flood then the lost storage results in flood waters being diverted elsewhere, leading to third party detriment. The detriment caused by a small encroachment may not be significant, or even measurable, when taken in isolation but the cumulative effect of many such encroachments will be significant. This approach to flood storage compensation is supported by both the Environment Agency and Norfolk LLFA. Therefore, please can you include further information relating to the assessment and prevention of flood storage loss and the associated consenting process for both ordinary watercourses and main rivers.</p>	<p>For larger schemes, like a basin extension, the amount of excavated peat would be much more and disposal on site may be difficult. That is where other options like nearby land will come into consideration. Again, we asked the EA for their thoughts and they said 'In general the risk is relatively low but for these schemes, however, if there was a larger scheme which provided a greater impact (i.e. more than a couple of centimetres), it would be necessary for the Broads Authority to 'ok' the off-site impacts (if at all). This may be if you agree the benefits outweigh the impacts. It would be worth (if not already) including something in the document stating that the flood risk impacts should be calculated or mitigated (although it is difficult to mitigate due to the Geography of the Broads). The Environment Agency would happily review any calculations supplied to us on a site by site basis and would be able to advise you of the impacts further which should help with your determinations'.</p>	<p>And then this question: <a href="#">a. How do your plans for disposing of peat affect flood risk? What calculations and mitigation, if needed, have you produced?</a></p>
#8	Sarah Luff	LLFA, Norfolk County Council	<p>The mapped Peat areas within the Broads Authority's area are shown in Appendix A. It would be useful to have reference to Appendix A within the main guidance text. In addition, would the Broads Authority be willing to provide a digital copy of our information? It would be useful for the LLFA to be aware of developments that may be in these areas of Peat</p>	<p>There is already reference to Appendix A in the text. There will be licencing requirements to consider. But the BGS layer can be found here: <a href="https://mapapps.bgs.ac.uk/geologyofbritain/home.html">https://mapapps.bgs.ac.uk/geologyofbritain/home.html</a></p>	<p>No change to guide.</p>



#9	Sarah Luff	LLFA, Norfolk County Council	<p>In relation to further information provided in Appendix A, it is indicated that further information is provided on the benefits of peat in flood risk management. Would you be able to share any further information you have or provide links to where this information can be found?</p> <p>In Appendix A, the Broads Authority has made the statement that “Water: Peaty soils help prevent flooding by absorbing and holding water like a sponge as well as filtering and purifying water. Peat can absorb large quantities of nutrient and other pollutants, although peat soils can under certain conditions release these chemicals back into the surrounding water.”</p> <p>The LLFA would like for this statement to be justified. As we are aware, peat soil naturally has a highwater content and frequently there is high groundwater, which means the void spaces within the peat soil are already saturated. If the ground is already saturated then there is very limited capacity for additional water from flood events. The LLFA is unsure of how the guidance document could reasonably state that “Peaty soils help prevent flooding by absorbing and holding water”.</p> <p>Therefore, the LLFA requests that information that supports this statement and any other information available on the benefits of peat in flood risk management at your disposal are shared so that we may support you on this matter.</p>	<p>Appendix A is taken from the Local Plan and this guide cannot change that wording.</p> <p>Peat soils in an ideal and healthy condition will be water-logged and as such form part of the floodplains natural water storage. Development and/or management that negatively affects the health and natural functioning of the peat will therefore limit this ability to store water.</p> <p>The statement in Appendix A is more about explaining why wet peat soils are important to protect.</p>	No change to guide.
#10	Mark Norman	Highways England	The proposals are unlikely to affect the Strategic Road Network in any way and therefore, we have no comments to make on the proposed guidance.	Noted.	No change to guide.
#11	Naomi Chamberlain	Norfolk CC	We advise that the SPD should include reference to paragraph 205 d) of the NPPF which states that planning permission should not be granted for peat extraction from new or extended sites.	This is not a SPD; it is a Guide. But we will make such reference.	Add to section 1: <a href="#">It should be noted that the NPPF refers to peat in terms of extraction, rather than development on peat. So for any schemes relating to the extraction of peat, it is important to note paragraph 205d) of the NPPF that says planning permission should not be granted for peat extraction from new or extended sites.</a>
#12	Ian robinson	RSPB	Introduction: In the second paragraph there needs to be a definition of what ‘organic content’ means for clarity.	Noted and we will add some explanation.	Add: <a href="#">organic content is partially decomposed plant matter which has carbon stored within it.</a>
#13	Ian robinson	RSPB	<p>Section 3: Fourth paragraph. Examples and clear definition are needed describing what kind of archaeology the guidance is referring to.</p> <p>Follow up: I don’t know what the statement ‘water-logged heritage’ means. All I was asking for was a definition to help me (and others) better understand and make a thorough, informed assessment of their proposal. An example would be if a conservation organisation wanted to create a number of small turf pond 5sq m and no deeper than 30cm would we be damaging the water-logged heritage? If we would be, what is the nature of that heritage and how can we mitigate for the damage?</p>	Noted. We will add some wording about water-logged heritage. Regarding the specific example, see comment 33.	Add some more wording about water-logged heritage.
#14	Ian robinson	RSPB	<p>Section 3 The final paragraph gives a false impression that peat soils are primarily important for absorbing flood water and filtering nutrients. Peat soils are most important as a medium in which protected plants and vegetation communities grow, this needs to be recognised and stated. The role of peat soils in purifying water leads to their deterioration and reduction in habitat quality as the peat soils (which in the Broads have low nutrient levels) become adversely nutrient enriched.</p> <p>Follow up: I suggest removing the text ‘as well as filtering and purifying water’ from the last paragraph of section 3. The peat soils in the Broads are characterised by low nutrient profiles – low nitrates and phosphates. This has created the unique habitats and species composition we see and which are protected by European law. Indeed 75% of the UK calcareous fen resource is found in the Broads. It may well be true that peat soils filter and purify water but if the impression given is that filtering and purifying water is a key function of peat soils in the fens then this needs amending. If peat soils capture nutrients they lose their intrinsic value and change adversely. Anything that causes these changes would be described as having a ‘likely significant effect’ on protected sites and protected species. These adverse changes would lead to deterioration of the peat soils and habitats leading to loss of swallowtail butterflies, loss of fen orchid etc.</p>	Noted. Will add some text to the end of this section to clarify.	Ad: <a href="#">But that does not mean that peat soils should be considered as a water treatment process.</a>



#15	Ian robinson	RSPB	Question relating to Section 4 Peat Report – Page 6. The guidance needs be clear on how recent the data from peat cores sampling should be. If peat samples have already been taken across a site, will this information be acceptable and if so beyond which point in time would this data/information become inadmissible? Substantial peat cores have already been taken across the Broads and a link to this information might provide a useful appendix.	To confirm, as set out in the guide, peat coring is only required near to the edge of the BGS boundary and if there is disagreement that the site in question is on peat. Coring is not required on all occasions. Historic information would be useful, but if there has been a big change to the site, then that could affect the historic core's accuracy and relevance. All soil information is historic, compelted around 1980 for the Broads and not systematically modified, but is still relevant. This is a site specific issue.	No change to guide.
#16	Ian robinson	RSPB	Questions relating to Section 5 - Page 8... and Appendix A Page 18. From the outset there needs to be clarity and definition of what represents development. For example, is there a minimum surface area and depth, below which excavation of peat or covering peat is not classified as development? This is particularly important for conservation purposes where small, shallow turf ponds are proposed (as described in Appendix A), or for example a fence post or footings for a bridge needs installing. Do these examples qualify as development? A list of activities which are exempt would be a useful addition as an appendix.	The issue raised is just not about peat, but relates to all applications. If anyone has any queries about what is development and what needs permission, we offer a free pre-application advice. Such a list would be extremely long and may not cover all eventualities.	No change to guide.
#17	Ian robinson	RSPB	RSPB suggests clarity is provided regarding sequential planning applications to make it clear that gradual creep will not be permitted. For example, an applicant may apply to create or extend an area for car parking involving loss of peat by 10m2. The overall objective of the applicant may be to ultimately create a larger covered area and they may decide to achieve this in a piecemeal way and submit further, subsequent applications to extend the parking area, which over time may be considerably larger than the initial application. It needs to be made clear at the outset that concurrent developments which may seek to perverse the process will be refused.	Any additional development that could lead to creep would require the submission of a separate application, which would be consdiered on its own merits, but the site's history would be taken into account.	No change to guide.
#18	Ian robinson	RSPB	In a similar way some clarity is needed describing that peat is valuable whether a site is designated or not and there is no difference between peat on a County Wildlife Site compared to a SSSI.	Peat policy is considered regardless of land designation.	No change to guide.
#19	Ian robinson	RSPB	Clarifying Confusion Between Development for Nature Conservation and Built Development RSPB suggests a clear distinction is made between traditional built development (housing, pilings, construction) where there is a permanent loss of peat; and peat excavation as part of nature conservation where the net result is positive and both the habitat and Carbon capturing potential is enhanced.	It is important to note that the peat policy and guide are not saying that development is not allowed on peat at all. It is a reduce, re-use kind of policy. One of the key questions is justifying why the scheme needs to go where it is proposed, can it be reduced in scale and then what are you going to do with the peat that is excavated. These queries are important and can be addressed, regardless of the type of development. Planning is all about weighing up the benefits with any negative impact a scheme can have.	No change to guide.
#20	Ian robinson	RSPB	If the proposed development/work is on a SSSI and the work is consented by Natural England through a site management plan and is deemed necessary for site management and is a valid plan or project as defined in European legislation and/or is part of habitat restorative/maintenance what approach is recommended? The draft guidance isn't clear and given the potential scale of works linked to habitat and species management, the large number of potential applications clarity here would help to limit inquiries and avoid unnecessary officer time and prevent the need for conservation charities to submit unnecessary and costly planning applications.	It is important to note that the peat policy and guide are not saying that development is not allowed on peat at all. It is a reduce, re-use kind of policy. One of the key questions is justifying why the scheme needs to go where it is proposed, can it be reduced in scale and then what are you going to do with the peat that is excavated. These queries are important and can be addressed, regardless of the type of development. Planning is all about weighing up the benefits with any negative impact a scheme can have.	No change to guide.
#21	Ian robinson	RSPB	Most of the proposed work carried out on SSSI's with peat soils involves creation of shallow scrapes (10-30cm deep and up to 25m2). What is the known intelligence regarding the benefit of 'new peat' created as these shallow scrapes accrete and the ability of newly forming peat to capture carbon as compared with existing peat? If indeed 'new peat' is better able to capture carbon as well as provide habitat for a wider range of biodiversity this may provide added impetus for this type of operation, especially if the process followed to obtain planning consent is considered separate from what be described as construction or built development; and given the benefits may warrant a reduced application cost.	Regarding reduced application cost, fees are set nationally. It is important to note that the peat policy and guide are not saying that development is not allowed on peat at all. It is a reduce, re-use kind of policy. One of the key questions is justifying why the scheme needs to go where it is proposed, can it be reduced in scale and then what are you going to do with the peat that is excavated. These queries are important and can be addressed, regardless of the type of development. Planning is all about weighing up the benefits with any negative impact a scheme can have.	No change to guide.



#22	Ian robinson	RSPB	<p>☒ If the development involves removing invading primarily willow and alder scrub and lifting and removing root plates to encourage and promote restoration of the fen, and which disturbs/removes some of the surface peat does this activity constitute removal of peat, require assessment and provision of information provided as part of a proposal/application?</p>	It is unlikely that this activity of essentially short-term disturbance and removal of scrub would be included.	No change to guide.
#23	Ian robinson	RSPB	<p>The opening comments in these sections of the document are contradictory and serve only to confuse. In 6.4.1 the direction given is that peat needs to be kept wet because drying peat releases Carbon and confirms the sentence in Section 3 which states 'The protection of peat soils is therefore critical to help address climate change.' In 6.4.2 this position regarding protection of peat soils and the need to keep them wet is completely eroded by saying that 'in some cases' it may not be possible to keep peat soils wet and then goes on to provide a list of several alternative uses for excavated peat all of which will release Carbon. Either peat needs to be kept wet or not. RSPB suggests any developments which cannot be completed in such a way that excavated peat soils are kept wet either at the parent site or at a donor site are refused. The guidance also needs to state what level of wetness needs to be achieved/maintained and whether this needs to be constant i.e. is periodic drying out OK or does the peat need to be perpetually waterlogged.</p> <p>Follow up: Following on from the above comment there may be opportunities where it is deemed ecologically, environmentally and archaeologically sound to excavate and transport peat to a donor site to reinstate peatland habitats lost to recent and historical land management practices, and where the transported peat will remain wet. Consideration needs to be taken that in order to maintain peat soils in a wet state will likely dramatically increase costs of maintaining the quality of some of the most biodiverse sites in the Broads. Some form of compromise regarding degree of wetness of peat needs to be made otherwise the new development guidance might lead to unreasonable management costs resulting in deterioration of the common, scarce and rare habitats and species for which the Broads is special.</p>	<p>There seems to be two points to this comment.</p> <p>The first is on the issue of keeping the peat wet and if the scheme cannot commit to this, why allow another option. The preference in the guide and policy is to keep the peat wet to ensure the carbon stays locked in. But we need to remember that this policy and guide are local approaches to protecting peat and its qualities and there is no national approach. To give the only option as keeping peat wet is restrictive and may be contrary to various planning rules and policies. The policy approach is not a stop of development on peat, but a reduce/re-use type approach. As such, the Authority is trying to be pragmatic and seek benefits from the peat if it cannot be kept wet. This policy approach is quite a step change in thinking about development on peat and given the national commitments to carbon dioxide and climate change, it may be that peat is addressed nationally or there is scope to go further as we produce the next local plan.</p> <p>The second point is asking how wet the peat should be kept. This is site specific. Ideally, for it not to waste, needs to be completely saturated for the majority of the year.</p>	<p>Add some text about the peat needing to be saturated for most of the year to the guide: <a href="#">In terms of keeping the peat wet, it will need to be somewhere so it is saturated for most of the year.</a></p>
#24	Ian robinson	RSPB	Following on from the above comment there may be opportunities where it is deemed ecologically, environmentally and archaeologically sound to excavate and transport peat to a donor site to reinstate peatland habitats lost to recent and historical land management practices, and where the transported peat will remain wet.	Noted. This will be considered on a case by case basis	No change to guide.
#25	Ian robinson	RSPB	Consideration needs to be taken that in order to maintain peat soils in a wet state will likely dramatically increase costs of maintaining the quality of some of the most biodiverse sites in the Broads. Some form of compromise regarding degree of wetness of peat needs to be made otherwise the new development guidance might lead to unreasonable management costs resulting in deterioration of the common, scarce and rare habitats and species for which the Broads is special.	The policy is not saying no development on peat. See previous comments. We are taking a pragmatic approach to using peat excavated.	No change to guide.
#26	Ian robinson	RSPB	<p>Thoughts on how to dispose of excavated peat:</p> <ul style="list-style-type: none"> <li>• Shred excavated peat then spread/blow across site – in a similar way to how a spoil or muck spreader broadcasts soils? Would this be acceptable on SSSI's?</li> </ul>	Noted. This is the sort of discssion we would have to have at time of application.	No change to guide.
#27	Ian robinson	RSPB	<ul style="list-style-type: none"> <li>• Create discreet sections of revetment along ditch edges (plastic piling or brushwood with biodegradable membrane) especially where ditches have been over-widened.</li> </ul>	Noted. This is the sort of discssion we would have to have at time of application.	No change to guide.



#28	Ian robinson	RSPB	<ul style="list-style-type: none"> <li>RSPB disagrees with the suggestion that incorporation of peat into agricultural soils can be a route for disposal of peat soils and feel undue focus is placed on providing 'acceptable' locations. Surely the primary aim is to keep peat wet and any soil improvement options are an absolute last resort.</li> </ul> <p>Follow up: 1. The hard line would be - if peat is such an important resource as a substrate and has critically important properties in mitigating for climate change in capturing carbon then any proposed development which is unable to ensure excavated peat will be kept wet, will not be permitted. The guidance states in 6.4 that in order to retain its important qualities peat needs to be kept wet. If peat isn't kept wet it loses its ability to retain carbon and actually releases carbon as it oxidises.</p> <p>2. What are the exceptional circumstances which over-ride the need to keep peat wet and consign the substrate to 'soil improver' status? In essence is it more important to allow development or to capture and retain carbon? If there genuinely are cases where development must take place it might help to provide guidance perhaps with an example such as 'replacement of riverside revetment to protect property with peat disturbance and maximum loss of 2cu m' is acceptable, but extending a parking area or mooring area which proposes disturbing previously untouched peat would be unacceptable.</p>	<p>The Guide and policy are clear that the ultimate aim is to reduce the volume of peat excavated. If the peat is to be excavated, then again, the guide is clear that it should be kept wet in order to preserve the carbon held within it. But we also need to be pragmatic - that on occasions, not all the peat will be able to be kept wet. And that is when we discuss other ways to make the most of the peat that is being excavated.</p> <p>We do agree this is a last resort and needs to be acceptable with regards to EA permissions. However, in principle, increasing soil organic matter can be beneficial for retaining water, fertiliser and chemicals on agricultural land rather than these leaching into groundwater that supplies rivers and wetlands.</p> <p>As part of the hierarchy of decisions of what to do with peat arising from developments, if peat were added to agricultural land which is adjacent wetland sites, this could provide offering services to wetland sites.</p> <p>It is important to note that this policy was never a prevention policy. That is to say that it is not the intention of the policy to stop development on peat. It is considered that to do so would be contrary to the economic objectives of national policy. Furthermore, this is a step change in the approach to considering schemes that will excavate peat.</p>	No change to guide
#29	Ian robinson	RSPB	Broads Authority need to provide acceptable locations, consented by Natural England with permissions obtained from Environment Agency indicating suitable, waste regulation compliant deposition areas.	Comment noted. The Guide does give suggestions about what to do with peat if it needs to be disposed off elsewhere and highlights what permits or licencing might be needed. But it is not our role to provide acceptable locations and get these consented - it is the role of the applicant and their agent.	No change to guide.
#30	Ian robinson	RSPB	<ul style="list-style-type: none"> <li>Moving peat offsite might require an environmental permit. The planning guide needs to clearly state examples of when this would normally be the case rather than leaving this as an open-ended statement!</li> </ul>	Noted. But this text was provided by the Environment Agency.	No change to guide.
#31	Ian robinson	RSPB	<ul style="list-style-type: none"> <li>The planning guidance needs to make clear that completion of a risk assessment is essential when moving soils to ensure biosecurity issues have been mitigated for.</li> </ul> <p>Follow up: Section 6.6 says 'When moving material, such as peat soils and associated vegetation from site to site, an assessment of the risk to spreading disease and non-native species and their propagules (such as seeds and roots) needs to be considered.' It doesn't describe how to go about assessing that risk and the information in the guidance is suggestive using statements such as 'you could do this.' Given the cost involved in dealing with INNS I suggest it better to be directive and offer guidance which states 'Before considering moving peat undertake a vegetation survey to determine whether there is visible evidence of INNS.'</p> <p>My suggestion of carrying out a risk assessment should be mandatory and to:</p> <ul style="list-style-type: none"> <li>Identify the hazard</li> <li>Evaluate the risk</li> <li>Put in place control measures</li> <li>Write it down</li> <li>Communicate to all concerned</li> </ul> <p>Providing a simple template to enable those proposing development to assess risk would smooth the process.</p> <p>The link on Gov.UK suggests spraying with chemicals is acceptable! This may not be the right way to go and often spraying with chemicals is of limited effectiveness.</p>	Comment noted. Chemical treatment is not always effective but it is an option. We would however encourage other ways to be considered. We agree it would be helpful to come up with something to help people regarding invasive species.	Include some guidance relating to ensuring biosecurity issues have been considered and addressed.



#32	Ian robinson	RSPB	<p>Reasoned Justification Page 17/18. Climate Change. Correct management and restoration could lead to enhanced storage of carbon and other greenhouse gases in these soils, while mis-management or neglect could lead to these carbon sinks becoming net sources of greenhouse gases.’</p> <p>Follow up: Comment is to qualify what correct management and restoration means, either in the document or making it clear this can be provided as advice from BA or other organisations. This advice need not necessarily be linked to development, may be part of an agri-environment agreement, could be gleaned from publications such as the ‘Fen Management Handbook.’ One specific element to consider is achieving correct water levels and flows and a description of what that statement means, namely to achieve near natural groundwater inputs and restriction of nutrient loaded surface water inputs, combined with appropriate management of vegetation growing on peat soils as described in the Fen Management Strategy and Natural England Site Improvement Programme statements and favourable condition assessments.</p>	<p>Many factors combine to vary emissions of GHG from soils and this is an emerging areas of academic research. It is not the place of this guide to simplify this complexity and we would expect correct management for GHG exchange to reference this (below) and other relevant literature</p> <p><a href="http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&amp;Module=More&amp;Location=None&amp;Completed=0&amp;ProjectID=17584">http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&amp;Module=More&amp;Location=None&amp;Completed=0&amp;ProjectID=17584</a></p>	No change to guide.
#33	Ian robinson	RSPB	<p>Reasoned Justification Page 17/18. Archaeology Page 18- Question. At what depth are archaeological features found? Is the surface 30cm devoid of features and if so, does the enable turf pond creation to proceed without cost of employing an archaeologist?</p>	<p>SCCAS were asked and responded saying:</p> <ul style="list-style-type: none"> <li>Specifying 30cm is risky as the depths of remains vary.</li> <li>Having said this if works are minimal such as turf removal we don’t need consulting.</li> <li>If there is any uncertainty we suggest contacting SCCAS at the earliest opportunity for free preapp advice.</li> </ul>	<p>Make reference to this advice in the guide: <a href="#">It should be noted that the depths that archaeology may be present varies. SCCAS advised that if works are minimal such as turf removal, the Records Service may not need consultation. However, if there is any uncertainty they suggest contacting them at the earliest opportunity for free pre-application advice.</a></p>
#34	Jessica Nobbs	Water Management Alliance	No comment	Noted.	No change to guide.
#35	Georgia Teague	Suffolk CC	<p>We welcome the inclusions of consideration for archaeology.</p> <p>The following minor suggestions are proposed, re contact details on page 9:</p> <ul style="list-style-type: none"> <li>The Suffolk Historic Environment Record is a collection of information about the nature and location of archaeological sites in Suffolk. The online public version can be found on the Suffolk Heritage Explorer: <a href="https://heritage.suffolk.gov.uk/simple-search">https://heritage.suffolk.gov.uk/simple-search</a></li> <li>Details of the Suffolk Archaeological Service can be found here: <a href="https://www.suffolk.gov.uk/index.php/culture-heritage-and-leisure/suffolk-archaeological-service/about-the-suffolk-archaeological-service/">https://www.suffolk.gov.uk/index.php/culture-heritage-and-leisure/suffolk-archaeological-service/about-the-suffolk-archaeological-service/</a></li> </ul>	Noted and agree. Will amend text.	Make suggested amendments.
#36	Georgia Teague	Suffolk CC	<p>From a minerals and waste perspective, it is understood that the removal and relocation of peat referred to is ancillary to other types of built development. However, if this happened on a large scale, we believe that it would constitute minerals and waste development and could require planning permission from the County Council. A parallel already exists in respect of reservoir creation where if the sand and gravel is removed from the site to create the reservoir then it is minerals extraction.</p> <p>Follow up: I would suggest a cumulative area of 1 hectare or above would constitute a suitable threshold at or above which SCC would require a separate planning application.</p> <p>100m x 100m = 10,000 sq. m (1 ha) Assume 2m depth = 20,000 cubic m Therefore I suggest 1 ha or 20,000 cubic m</p>	<p>A meeting was held with Norfolk CC and Suffolk CC Minerals and Waste teams to discuss this. It was agreed that for schemes of 1ha in area or 20,000 cubic metres in volume or more, that the BA will consult the relevant Minerals and Waste Team. It is acknowledged that not many, if any schemes, of this scale will come forward.</p>	Add wording about consulting Minerals and Waste Teams for schemes above a certain threshold.
#37	Georgia Teague	Suffolk CC	<p>SCC is concerned that the references to landscape in the peat soils guide is somewhat limited. The guide (and policy) focuses on the ecological and climate change concern.</p>	<p>The guide refers to the qualities of the peat itself. Landscape is addressed through the landscape section of the Local Plan, by consulting our Landscape Architect Consultant as appropriate and by using our landscape guide.</p>	No change to guide.
#38	Georgia Teague	Suffolk CC	<p>SCC believes that, the potential impact on landscape character is somewhat underrated and left out/ of this document. Fens, fen meadows and reedbeds are landscapes that are potentially quite susceptible to change by development. It is hoped that the landscape and visual amenity concerns may be already addressed elsewhere.</p>	<p>The guide refers to the qualities of the peat itself. Landscape is addressed through the landscape section of the Local Plan, by consulting our Landscape Architect Consultant as appropriate and by using our landscape guide.</p>	No change to guide.
#39	Georgia Teague	Suffolk CC	<p>SCC would like to note that on page 10 (just before the box j.), the sentence is a little hard to read/understand, and the following amendment is suggested in order to provide ease of reading: “The usual planning process will be followed, in terms of including habitat surveys, and seeking biodiversity net gain through appropriate biodiversity enhancements. and, when the details are finalised, any requirement of biodiversity net gain.”</p>	<p>Agree that some amendments to the text would be beneficial.</p>	Amend text in line with comment.



#40	Georgia Teague	Suffolk CC	It is recommended that this guide should add a reference at Paragraph 6.3 “Biodiversity” (Page 9), something that refers the reader to Suffolk Biodiversity Information Service and Norfolk Biodiversity Information Service (as is the case with heritage). Further, although NERC Act 2006 has been referred to, similar duties towards the conservation of biodiversity are also set out in the NPPF.	Noted and will amend text.	Amend text in line with comment.
#41	Paul Harris	South Norfolk DC	The Council does not wish to offer any comments on this document.	Noted.	No change to guide.
#42	Paul Harris	South Norfolk DC	The Council does not wish to offer any comments on this document.	Noted.	No change to guide.
#43	Penny Turner	Norfolk Police	As the Designing Out Crime Officer, I shall be submitting no comment on behalf of Norfolk Police in this instance.	Noted.	No change to guide.
#44	Martin Dade	-	<p>differences between un-disturbed peat in locality and areas of housing, where dredgings and dried peat has previously been deposited.</p> <p>Areas like Horning and Wroxham - we have not encountered un-disturbed peat in dredging works for many years, but there is likely to be dried peat dredgings on reinstated eroded ground, so the requirement for coring should be in comparative to application - which I assume the 300mm depth refers to.</p> <p>Locality - meaning in-situ, as created, ie reed beds, un-disturbed garden areas</p> <p>Dredging would be removing silted existing river/mooring areas - most moorings and river areas near properties have been extensively excavated of peat to depths of 3.6m previously, so this peat would have been placed on adjacent banks and allowed to dry out, thus the need to recognise dried peat in the policy.</p>	Dredging focuses on removing accumulated sediment rather than unexcavated peat so there shouldn't be a conflict. If an area is being excavated that has received peat arisings previously, the question would be whether unexcavated peat is in situ at lower levels and/or whether the previously deposited peat had been kept wet and so retains structure and optimal value. Past use of the site and potentially cores to determine amount and condition of peat would guide each application.	No change to guide.
#45	Tom Holt-Wilson	Norfolk Geodiversity Partnership	The Norfolk Geodiversity Partnership approves this document. It recognises the palaeo-environmental significance of peat deposits (Appendix A) and acknowledges that the NGP is an interested organisation (section 6.2).	Support noted.	No change to guide.
#46	Rachel Bowden	Natural England	Natural England has no comments to make regarding the consultation on these guides.	Noted.	No change to guide.
#47	Rachel Bowden	Natural England	<p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</p> <p>Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.</p> <p>The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <a href="https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice">https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice</a></p>	Noted. This seems to be generic advice. It does not seem to be seeking changes to the document.	No change to guide.
#48	Liam Robson	Environment Agency	We have no comments on the peat guide	Noted	No change to guide.
#49	Rob Wise	NFU East Anglia	Section 4.6 refers to the Authority producing it's own peat mapping which is to be applauded and would be a more accurate and therefore better alternative to the BGS peat layer. Similarly other resources are available and being updated more regularly than the BGS layer, notably the Landis data set of Cranfield University. Developers should have the opportunity to use this and it should be referenced in both Section 4.1 and Section 4.6.	Noted and agree. Other sources of information would be relevant and used as and when available. Will add reference to this to 4.1 and 4.6.	Bring 4.6 to join 4.1 and refer to the Cranfield dataset.
#50	Rob Wise	NFU East Anglia	Section 6.4.2 references the National Farmers Union (East Anglia) as a potential point of contact. We would prefer the following wording: “If you have been unable to contact adjacent farmers for possible re-use application to agricultural land, and the quantities involved are large enough to warrant field scale spreading, get in touch with the NFU to see if they can help locate a suitable recipient farm.	Noted and agree. Will amend text.	Will add this text.
#51	Hannah Cutter	Suffolk County Council Archaeological	Please refer to us as Suffolk County Council Archaeological Service	Noted and agree. Will amend text.	Will add this text.



#52	Hannah Cutter	Suffolk County Council Archaeological	Please include: SCCAS are happy to discuss the archaeological potential of any proposed developments and provide free advice on the archaeological requirements for projects. We recommend consultation with SCCAS before a planning application is submitted.	Noted and agree. Will amend text.	Will add this text but also include Norfolk' services in the text.
#53	Hannah Cutter	Suffolk County Council Archaeological	Link to this page <a href="https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/archaeological-planning-and-countryside-advice/">https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/archaeological-planning-and-countryside-advice/</a>	Noted and agree. Will amend text.	Will add this link.
#54	Hannah Cutter	Suffolk County Council Archaeological	The Suffolk Heritage Explorer is for personal interest/research, it is not suitable for planning applications.	Noted and agree. Will amend text.	Will add this caveat.
#55	Hannah Cutter	Suffolk County Council Archaeological	The final bullet point linking to our page on how the SHER works/what it is for, does not require changing.	Noted.	No change to guide.
#56	Fleur Bradnock	-	Thank you for the opportunity to read the draft Peat Guide which I have found of great interest. I was particularly happy to see that the Authority's preference is not to develop on, excavate or remove peat, rightly so, for all the reasons detailed and I hope that this aim will be achieved by the guide	Support noted.	No change to guide.



# Guide to understanding and addressing the impact of new developments on peat soil

[Adopted March 2021](#)



# Contents

1.	Introduction	3
2.	Consultation	4
3.	Why should we protect peat?	6
4.	Assessing if the site to be developed is on peat soil – Stage 1.	6
4.1.	Sources of data. <del>The British Geological Society Peat Layer</del>	6
4.2.	The need for sampling	7
4.3.	How to take samples	7
4.4.	Using suitable experienced Consultants or Contractors	8
4.5.	Reporting your findings.	8
4.6.	<del>Other sources of data</del>	8
5.	Developing on or removing peat – Stage 2	9
5.1.	Consider the location of your scheme	9
5.2.	Consider the layout and scale of your scheme	9
6.	Things to do if your development will be affecting peat soils – Stage 3.	10
6.1.	Archaeology	10
6.2.	Research - Climatic records (paleo-environment) and geodiversity	11
6.3.	Biodiversity	11
6.4.	What to do with the excavated peat	12
6.5.	Moving peat - Environmental Permitting	15
6.6.	Moving peat - Biosecurity	16
6.7.	Proposals that deposit material on peat/develop over peat	16
6.8.	Transporting peat - emissions	17
6.9.	Flood risk	17
6.10.	Excavating peat – County Matters	18
7.	Key messages	19
8.	Helpful links and where to go to get advice	19
	Appendix A – Adopted Policy DM10 Peat Soils	21
	Reasoned justification	21
	Appendix B – Map of peat	24



Appendix C – Peat report template	25
About the planning application/scheme	25
About this report	25
If you have completed on site peat assessments	25
About your development proposal	25
About the peat that is to be excavated	26
Addressing the special qualities of peat	26
Disposal of the excavated peat	26
Appendix E – Privacy notice	29
Personal data	29

## 1. Introduction

Historically peat was extracted for fuel. The diggings were eventually abandoned and left to flood creating the shallow stretches of water now known as the broads (lakes). Today peat is considered as a finite and precious resource. ~~In the Broad, development can take place in areas where peat might be developed on, excavated or removed.~~ In the Broad, development on occasion may be proposed that can affect peat because it is excavated or removed, or actually developed on.

Peat is formed from plant material that decays slowly in a waterlogged environment. Over thousands of years, peat becomes several metres thick. Because the main component is organic matter, peat is very spongy, highly compressible, and combustible. Here we use the definition used by soil scientists who define peat as organic soil with organic content of greater than 35% organic matter. Organic content is partially decomposed plant matter which has carbon stored within it.

Peat soils have many important qualities (see section 3). The Local Plan for the Broad includes a policy (see [Appendix A](#)) that aims to reduce the impact on these important qualities by reducing the amount of peat removed. It goes on to ensure that any peat excavated is disposed of in a way that takes into consideration and protects its properties and qualities.

This guide provides additional information to help applicants meet the requirements of the policy. The process for considering schemes that are located on peat is as follows and this guide talks through the stages in more detail.



Stage	Section of this report
A. Assess if the scheme/proposal is situated on peat	Section 4
B. Does the scheme need to go there? What other locations could be considered?	Section 5
C. Can you reduce the amount of peat affected? Consider the format, scale and layout of the proposal.	Section 5
D. Can you justify why the scheme should go ahead?	Section 5
E. How have you considered and addressed archaeology, biodiversity, research (paleo-environment data), water and carbon qualities of the peat?	Section 6
F. Can you dispose of peat on site so it does not emit the carbon locked in?	Section 6
G. Can left over peat be used in other schemes in the area?	Section 6
H. Can left over peat be put to a suitable re-use?	Section 6

It should be noted that the NPPF refers to peat in terms of *extraction*, rather than *development on peat*. Therefore, for any schemes relating to the *extraction* of peat, it is important to note paragraph 205d of the NPPF that says planning permission should not be granted for peat *extraction* from new or extended sites.

## 2. Consultation

~~This consultation document and consultation process have been developed to adhere to the Broads Authority's Statement of Community Involvement<sup>1</sup>. We have updated our Statement of Community Involvement. The main changes to how we intend to consult on this document are as follows:~~

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<sup>1</sup> Current Statement of Community Involvement is here [https://www.broads-authority.gov.uk/data/assets/pdf\\_file/0024/209337/Final\\_adopted\\_SCI\\_formatted\\_July\\_2020.pdf](https://www.broads-authority.gov.uk/data/assets/pdf_file/0024/209337/Final_adopted_SCI_formatted_July_2020.pdf)



- ~~If you wish to discuss the document, you can still call on 01603 610734 and ask to speak to Natalie Beal. You can also contact Natalie Beal to request a video conference appointment to talk about the document.~~
- ~~No hard copies will be in libraries.~~
- ~~No hard copies will be in Yare House<sup>2</sup>.~~
- ~~If you wish to have a hard copy, we can send this to you. This will initially be for free, but if we get many requests, we may have to consider charging for postage and printing. Please contact the number above to ask to speak to Natalie Beal to request a hard copy.~~

~~The second consultation on this document is for 8 weeks from 25 September to 20 November 2020. We will then read each of the comments received and respond. We may make changes if we agree with you. If we do not make changes we will set out why. The final Guide will be adopted at a future meeting of the Broads Authority. Please email us your comments: [planningpolicy@broads-authority.gov.uk](mailto:planningpolicy@broads-authority.gov.uk).~~

~~Information provided by you in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), and the Environmental Information Regulations 2004). Please see [Appendix B](#) for the Privacy Notice. We will make your name and organisation public alongside your comment.~~

~~**Are you satisfied that this consultation has followed the Consultation Principles?** If not, or you have any other observations about how we can improve the process, please contact us at [planningpolicy@broads-authority.gov.uk](mailto:planningpolicy@broads-authority.gov.uk).~~

The Peat Guide was consulted on in 2020. The consultation ran from 25 September to 20 November 2020. The comments that were received, the Broads Authority's response to the comments and the amendments which comments may have resulted in, can be found here: [{For the purposes of Planning Committee and Broads Authority, the comments are at an appendix attached to the report. The actual link will go in the report, when this Guide and the comments received are uploaded to the website}.](#)

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<sup>2</sup> Whilst this Guide is not a local plan or SPD, we still consult in the same way as we would those documents. The Government recently amended regulations saying that until 31 December 2021, Local Planning Authorities do not need to make hard copies of planning documents available in head offices or other venues.



### 3. Why should we protect peat?

Peat is one of the main soil types in the Broads and an important asset with important qualities, providing many **ecosystem services**<sup>3</sup>.

The soils formed by the Broads wetland vegetation store 38.8 million tonnes of carbon<sup>4</sup>. Peat soils release stored **carbon** if they are drained and allowed to dry out. The protection of peat soils is therefore critical to help address climate change.

Peat soils support internationally important fen, fen meadow, reedbed, wet woodland and lake **habitats**. For example, milk parsley, the food plant of the Swallowtail caterpillar, tends to grow only on peat soils in the Broads.

Historic England has identified the Broads as an area of 'exceptional waterlogged heritage'<sup>5</sup>. Because of the soil conditions in the Broads, there is great potential for **archaeology** to be well preserved, giving an insight into the past.

The peat has accumulated over time and incorporates a **record** of past climatic and environmental changes that can increase knowledge of the evolution of the landscape.

Peaty soils help prevent flooding by absorbing and holding **water** like a sponge as well as filtering and purifying water. But that does not mean that peat soils should be considered as a water treatment process.

### 4. Assessing if the site to be developed is on peat soil – Stage 1.

#### 4.1. Sources of data. ~~The British Geological Society Peat Layer~~

The British Geological Society peat layer (which is accessible through our internal mapping system and here: <http://mapapps.bgs.ac.uk/geologyofbritain3d/>) is the starting point, but it is not accurate in all locations, particularly around the boundaries of the peat shown. We would use this mapping system to check if a site is located on peat soils. A map showing the British Geological Society peat layer is at [Appendix B](#).

There are also other sets of data available, such as the Landis data set of Cranfield University. The Authority is in the process (at the time of writing) of commissioning work to produce more detailed peat mapping. This may be considered, when it is completed, in

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<sup>3</sup> The diverse benefits that we derive from the natural environment are sometimes referred to as ecosystem services. Examples of these services include the supply of food, water and timber (provisioning services); the regulation of air quality, climate and flood risk (regulating services); opportunities for recreation, tourism and education (cultural services); and essential underlying functions such as soil formation and nutrient cycling (supporting services). [Payments for Ecosystem Services: A Best Practice Guide](#)

<sup>4</sup> NCA Profile 80, Natural England and the Broads Authority's Carbon Reduction Strategy: [www.broads-authority.gov.uk/data/assets/pdf\\_file/0011/400052/Carbon-reduction-strategy.pdf](http://www.broads-authority.gov.uk/data/assets/pdf_file/0011/400052/Carbon-reduction-strategy.pdf)

<sup>5</sup> [Historic England has identified the Broads as an area of exceptional waterlogged heritage. Because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, giving an insight into the past.](#)



assessing if a site may or may not be on or near to peat. But until that point, the British Geological Layer will be the starting point.

#### 4.2. The need for sampling

If you (the applicant) disagree that your site is on peat soils, we will ask you to undertake soil core sampling. If your site is towards the edge of an area of peat (either inside or outside of the area) as shown on the BGS maps, we may ask you to obtain soil core samples<sup>6</sup>.

It is important to note the following:

The BGS layer is based on a scale of 1:50 000 (1mm equates to 50m on the ground). The 'edge' of the peat layer should only be used as a guide at a local level. Therefore, if an application on the ground is within 50m of an area of peat based on the 1:50000 BGS superficial geology data the we may require peat sampling.

The 1:50 000 scale digital map data is generalised and the geological interpretation should be used only as a guide to the geology at a local level, not as a site-specific geological plan based on detailed site investigations. The cartographic accuracy of BGS data is 1 mm which equates to 50 m on the ground at 1:50 000 scale. Therefore, if an application on the ground is within 50m of an area of peat based on the 1:50000 BGS superficial geology data the Peat policy may apply.

Reference: User Guide for the BGS Geology: 50k dataset (V8) - Link on this page The BGS Geology 50k user guide

#### 4.3. How to take samples

Where soil core samples are required, these samples would be to the depth of the proposed excavation. You should use a specialised soil corer or spade or excavator depending on the depth and area/volume of the scheme proposals. If the development is going to involve shallow excavation (0-30cm) or the proposals will cover peat, surface examination with a spade is sufficient. Development that will excavate to a greater depth (deeper than 30cm) will need a core sample. There may need to be multiple cores depending on the extent of the proposed scheme and the location. The depth and number of core samples will be agreed with the Authority in advance.

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<sup>6</sup> Please note that both Norfolk and Suffolk Historic Environment Record Services have confirmed that they do not consider the taking of cores as a concern due to the relative size of the cores. The knowledge-gain obtained from the cores will in most cases outweigh any adverse impact.



Please note that at the time of writing, there are wider discussions nationally regarding the potential to standardise how peat is assessed. Such standard, as and when it is in place, will be of relevance when considering schemes located on peat.

#### 4.4. Using suitable experienced Consultants or Contractors

You may wish to engage the help of a consultant/contractor who is expert/experienced in soils and soil cores. There are numerous consultants/contractors listed on the internet. We are aware that taking cores of peat will result in a cost to you the applicant. The number of cores required and depth, as discussed previously, will be proportionate and will be agreed with the Broads Authority.

Costs will vary for different consultants.

#### 4.5. Reporting your findings.

A report setting out the method used, including photographs of the soil cores and an assessment of the soil stratigraphy (layers) is required for submission to the Broads Authority to accompany planning applications. A minimum assessment would need to include datum level of the top of the ground surface where the core was collected; general description of the core stratigraphy and depths where distinct layers start and finish; detailed characterisation of each distinct layer, e.g. soil classification type; organic matter and mineral content of the layers may be required to identify degraded or peat mixed with other materials within the profile.

Ultimately it will conclude if the soil to be affected is peat soils. Again, the report would be proportionate to the size and scale of the scheme.

Please note that the document will be public and will be shared with Norfolk and Suffolk Historic Environment Records Services and Norfolk and Suffolk Biodiversity Information Services for their records. It will also be passed on to Cranfield University who hold the national survey data.

#### ~~4.6. Other sources of data~~

~~The Authority is in the process (at the time of writing) of commissioning work to produce more detailed peat mapping. This may be considered, when it is completed, in assessing if a site may or may not be on or near to peat. But until that point, the British Geological Layer will be the starting point, as discussed at 4.1.~~



## 5. Developing on or removing peat – Stage 2

### 5.1. Consider the location of your scheme

The Authority's preference is not to develop on, excavate or remove peat. As such, can your scheme go elsewhere?

- a. Why does the development have to go where it is proposed?
- b. What **alternative locations** have you considered? Why have you discounted these alternative locations?

If there are no other suitable **locations** for the proposal that are not on peat soils, and you can evidence this and justify your conclusion, the next stage is to **reduce** the amount of peat that is developed.

### 5.2. Consider the layout and scale of your scheme

It may be that another part of your site is not peat soils. The **layout** of your development could be changed to avoid developing on or excavating peat soils. The **scale** of the development or part of the development on peat soils could be reduced.

- c. How can you reduce the amount/volume of peat that is to be developed? Please provide details. If you cannot reduce the volume, please say why.
- d. How can you change the **layout** of development to reduce the amount of peat soils affected? Please provide details. If you cannot change the layout, please say why.
- e. How can you reduce the **scale** of development to reduce the amount of peat soils affected? Please provide details. If you cannot change the scale, please say why.
- f. If amending the layout/scale of the site is not feasible, practical or viable and you intend to still develop on peat soils, you need to provide a robust justification for doing so.
- g. What volume of peat (m<sup>3</sup>) will be excavated? How is this different to your initial plans?

**When planning your scheme, you must consider what will be done with the left over peat/material. You need to be aware that if you intend to move the peat off site, you may need an Environmental Permit.**



## 6. Things to do if your development will be affecting peat soils – Stage 3.

If you have gone through the steps set out in the document and you can justify thoroughly why peat soils will be developed then you need to address the following.

### 6.1. Archaeology

Contact Norfolk ~~or Suffolk~~ Historic Environment Records Services and [Suffolk County Council Archaeological Service](#) to find out if there is any potential for archaeology. Both services are happy to discuss the archaeological potential of any proposed developments and provide free advice on the archaeological requirements for projects.

It should be noted that the depths that archaeology may be present varies. SCCAS advised that if works are minimal such as turf removal, the Records Service may not need consultation. However, if there is any uncertainty they suggest contacting them at the earliest opportunity for free pre-application advice.

Both services recommend consultation with them before a planning application is submitted.

The following links may be of use:

- Norfolk Heritage Explorer: This website offers a unique opportunity to access an abridged version of the Norfolk Historic Environment Record database online. <http://www.heritage.norfolk.gov.uk/>. Suffolk Heritage Explorer: <https://heritage.suffolk.gov.uk/simple-search>. Please note that these are for personal interest/research.
- Heritage gateway: <https://www.heritagegateway.org.uk/gateway/chr/>
- ~~Suffolk Historic Environment Record is a collection of information about the nature and location of archaeological sites in Suffolk: <https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/what-is-the-historic-environment-record/>~~
- [Suffolk Archaeological planning and countryside advice](#)  
<https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/archaeological-planning-and-countryside-advice/>
- The Suffolk Historic Environment Record is a collection of information about the nature and location of archaeological sites in Suffolk. The online public version can be found on the Suffolk Heritage Explorer: <https://heritage.suffolk.gov.uk/simple-search>



- [Details of the Suffolk Archaeological Service can be found here:  
https://www.suffolk.gov.uk/index.php/culture-heritage-and-leisure/suffolk-archaeological-service/about-the-suffolk-archaeological-service/](https://www.suffolk.gov.uk/index.php/culture-heritage-and-leisure/suffolk-archaeological-service/about-the-suffolk-archaeological-service/)

- h. How have you considered and addressed archaeology on this site?
- i. Is there potential for archaeological finds on this site?

## 6.2. Research - Climatic records (paleo-environment) and geodiversity

The cores you extract (and associated report), the peat you excavate and/or the 'pit' that is the result of excavation might be of interest to several people/organisations. Such organisations include Universities, British Geological Survey, British Soil Society, Cranfield University, Norfolk and Suffolk Biodiversity Information Services, Norfolk and Suffolk Historic Environment Record Services and Norfolk Geodiversity Partnership.

We will share information (in line with GDPR) of schemes that we permit on peat with these organisations. They may contact you to arrange to visit the site when it is being excavated. We will also share any information provided by you (such as core reports) with organisations. The Authority does not consider this a burden on you. The sharing of information or allowing pits to be visited at a mutually convenient stage of the process are in the interest of helping with research and education. You will be able to arrange visits at a suitable time for you.

## 6.3. Biodiversity

One of the three main purposes of the Broads Authority is to conserve and enhance the natural beauty, wildlife and cultural heritage of the Broads.

The peat soils of the Broads support some of the most important habitats for wildlife conservation including fen, fen meadow, reedbed, wet woodland and the shallow lakes or 'Broads'. A quarter of the rarest species in the UK are found here.

These peaty habitats are recognised for their exceptional nature conservation importance, and hold conservation designations on national and international levels<sup>1</sup>. Outside of these designated areas peat habitats are still considered to be or have the potential to be restored to high biodiversity value, providing important habitat corridors for wildlife across the National Park and beyond.

The Natural Environment and Rural Communities (NERC) Act 2006 requires government departments to have regard to the purposes of conserving biodiversity. This may include enhancing, restoring or protecting ~~a population~~ priority species or habitats. In the Broads ~~these habitats above~~ are recognised under the NERC act as Section 41 / Biodiversity Action Plan (BAP) habitats and species, ~~These areas~~ and they should be protected and restored, with no loss to development. The NPPF also seeks to protect the most valued sites of biodiversity interest as well as seeking net gain.



The usual planning process will be followed, in terms of [including](#) habitat [and species](#) surveys, [mitigating habitat and species loss, and seeking biodiversity net gain through appropriate](#) biodiversity enhancements. ~~and, when the details are finalised, any requirement of biodiversity net gain.~~ [Applicants may benefit from referring to Suffolk and Norfolk Biodiversity Information Services<sup>7</sup>.](#)

j. How have you considered the biodiversity enhancement options on your peat site?
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#### 6.4. What to do with the excavated peat

You need to identify and explain as part of your peat report, how the peat excavated from your scheme will be re-used or disposed of. Peat will need to be re-used or disposed of in a way that ensures it keeps its important qualities. There are two ways to do this. The first, and this is the preference, is to re-use the peat so it stays wet. The second, and this is least preferred, is beneficial re use of peat that may result in it drying out, but make use of its qualities. These are discussed in more detail in the next sections.

##### 6.4.1. Re-using peat on your site

The peat needs to go somewhere it will be kept wet. It cannot be left piled up to dry out. If it dries out then it becomes a source of carbon dioxide and this is something we need to avoid.

[In terms of keeping the peat wet, it will need to be somewhere so it is saturated for most of the year.](#)

Are there any voids on your site and could the peat go there? Are there any areas of your site that have sunk that could receive your peat (although see the land raising policy DM17)?

- i. These voids could be behind quay heading or underneath decking (subject to a suitable retainer) for example.
- ii. The receiving void will need to ensure the peat is kept wet for the long-term.
- iii. You will need to mark receiving areas on a plan that shows the anticipated volume of peat these receiving areas can take. Peat is very wet and the actual volume of excavated peat could realistically be greater than anticipated.
- iv. You will need to talk to your contractor about the relocation of the peat. It is important to note that this is a new approach and contractors are used to drying out the peat so the volume of material is reduced, which must be prevented. They may also have suggestions on how and where to dispose of peat.

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<sup>7</sup> <http://www.nbis.org.uk/> and <https://www.suffolkbis.org.uk/>



- v. You will need to prepare the receiving areas before you excavate the peat. This is because you will need to put the peat in these receiving areas before the peat dries out. The time period for this depends on the season. The Authority acknowledges that excess water may need to drain away so the material is manageable; we are advised that 14 days to allow excess water to drain is acceptable. We will need to understand and agree the timeframe for moving peat, once drained.
  - vi. You may need to place a tarpaulin over the peat to prevent it drying between excavation and backfilling or depositing the peat.
  - vii. We will require you to tell us when you will be excavating so we can come and check on the progress and the method.
- k. Where do you intend to dispose of the excavated peat soils on site? Please show on a plan with anticipated volume of each receiving area.
  - l. How will these areas ensure the peat is kept wet?
  - m. When will the receiving areas be ready to receive peat soils? What is the time-period between excavation and backfilling/depositing? Have you arranged for the peat to be covered with tarpaulin for this period?

#### 6.4.2. Disposing of peat - elsewhere

If there is nowhere on your site suitable then you may wish to talk to your neighbours to see if they have anywhere to dispose of your peat so it remains wet – again, under decking or backfilling for example.

[In terms of keeping the peat wet, it will need to be somewhere so it is saturated for most of the year.](#)

There may be other areas locally that could receive the peat and keep it wet – for example, schemes planned by the Environment Agency, Norfolk or Suffolk Wildlife Trust and the Broads Authority<sup>8</sup> as well as other local contractors. You will need to discuss this option with the Broads Authority.

It is acknowledged that moving the peat elsewhere will emit greenhouse gasses, but see section 6.8 about transporting peat and associated emissions.

In all instances, you will need to consider the need for Environmental Permits (see 6.5) and also respond to the bullet points above. The receiving site may require planning permission as well.

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<sup>8</sup> When we receive applications for development on peat that involved excavating material, we will circulate the details of the scheme internally as the Operations team may be aware of schemes that need material.



If there is nowhere in your local area where peat could be disposed of in a way that keeps it wet then it is worth rethinking whether you should proceed with your development. The cost of transporting wet peat soil and obtaining a waste licence can be significant.

- n. Have you contacted neighbouring landowners or Operational teams in the Environment Agency, Norfolk and Suffolk Wildlife Trust and Broads Authority to check what local opportunities may exist for receiving peat and keeping it wet?
- o. How have you discussed your approach to dealing with the excavated peat with your contractor? Have they confirmed the approach is feasible?
- p. Have you looked into the need for an Environmental Permit for moving the excavated peat offsite?

#### 6.4.3. Re-use of peat

The Authority accepts that peat can be used in a way that uses its qualities. This will only be considered when disposal/use on site or elsewhere (that keeps the peat wet) is not possible. The rationale for requesting re-use of peat must be accepted by the Authority before it is developed further. Alternatively, if suitable disposal can be found for some of the excavated material but not all, the remaining amount could be used.

It is acknowledged that re-use will probably result in the CO<sub>2</sub> being held in the peat being emitted which although is undesirable, the re-use will at least provide other advantages such as improving soil for local food growing and reducing food miles.

The main way to dispose of/re-use the peat is to incorporate it into agricultural land or local allotments. There is also the potential to dispose of some peat into soak dykes. Again, you will need to consider the Environmental Permitting section of this guide – 6.5.

In terms of re-use, you may want to speak to the following organisations to see if they or their associates are willing to receive and make use of the excavated material. They may be able to make a use out of the peat. These are in no particular order. Please also see the Environmental Permitting section of the guide.

- **Local allotment associations.** Contact the local Parish/Town Council for details of local allotment associations. They may be willing to receive some peat for the members to then use on their plots.
- **Norwich Farm Share's** vision is to support food systems that educate, connect and empower local communities to be healthier and more resilient, to be rooted to the land and to each other, and to experience a direct relationship with how our food is produced.
- **National Farmers' Union (East Anglia).** ~~Probably for large quantities of peat, but get in touch with the NFU to discuss the potential for a farmer to make use of the peat.~~  
If you have been unable to contact adjacent farmers for possible re-use application



to agricultural land, and the quantities involved are large enough to warrant field scale spreading, get in touch with the NFU to see if they can help locate a suitable recipient farm.

- **Wayland Prison, working with Greener Growth CIC.** They are recovering two unused poly-tunnels to create a commercial herb-growing project. From this they will be able to provide transferable skills to residents within the Prison and create a space that will help with residents' wellbeing.
- **Cringleford community food growing.** Small-scale growing vegetables with a small poly-tunnel and raised beds. Working with lots of volunteers and getting children involved in the project.

It will be for the applicant to contact the organisations above regarding the potential for re-use of peat. The receiver may need assurances of the physical and chemical quality of the material. In terms of transporting the peat, that will need to be something that the applicant discusses with the receiver as well as timing of delivery and volume they will be willing to receive.

- q. Have you contacted any operators to see if they are willing and able to receive and use the excavated peat?
- r. Have you contacted local allotment organisations to see if they can make use of the peat?
- s. Have you looked into the need for an Environmental Permit for moving the excavated peat off site for re-use?
- t. What is the contingency plan for any peat left over after reducing the amount of peat excavated in for the first place, using the peat on site so it keeps wet, using the peat locally so it keeps wet and re-use of the peat?

## 6.5. Moving peat - Environmental Permitting

Excavated peat that you no longer require for use on the same premises will likely be considered waste. If it is intended to reuse the waste peat at another location please be minded that the reuse may be subject to regulation by the Environment Agency.

You can find more information about environmental permits and waste exemptions granted by the Environment Agency here <https://www.gov.uk/topic/environmental-management/environmental-permits>.

If, after reading the information about permits and waste exemptions you are still unsure as to whether a permit or other regulatory control is required contact the Environment Agency Customer Enquiries Team on 03708 506506 or send an email to [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)



The information the Environment Agency requires to assist with identifying the appropriate regulation should include as a minimum, a description of the waste, in this case peat, the volume of material in tonnes, and a description of the intended use e.g. spreading on an agricultural field.

If you pass on your waste to a third party you should make sure that the carrier of the waste is registered as a waste carrier and that the carrier provides you with documentation identifying the movement; most commonly a waste transfer note. If you are in doubt as to the legitimacy of the waste carrier you can check their validity on the Environment Agency's public register here <https://environment.data.gov.uk/public-register/view/search-waste-carriers-brokers> or alternatively contact the Environment Agency Customer Enquiries team.

- u. If you are moving peat soils from site, how have you ensured you are going to be in accordance with Environmental Permitting requirements?

#### 6.6. Moving peat - Biosecurity

Biosecurity refers to a set of precautions that aim to prevent the introduction and spread of harmful organisms. These include non-native tree pests, such as insects, and disease-causing organisms, called pathogens, such as some bacteria and fungi. When moving material, such as peat soils and associated vegetation from site to site, an assessment of the risk to spreading disease and non-native species and their propagules (such as seeds and roots) needs to be considered.

To prevent the spread of invasive, non-native plants, you must not cause certain invasive and non-native plants to grow in the wild. This can include moving contaminated soil or plant cuttings. You can be fined or sent to prison for up to 2 years. Further details:

<https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants>

<https://www.gov.uk/government/publications/treatment-and-disposal-of-invasive-non-native-plants-rps-178>.

The Broads Authority has also produced a guide/template that may be of assistance when considering biosecurity: [https://www.broads-authority.gov.uk/data/assets/pdf\\_file/0020/196211/Biosecurity-Guidance-Draft.pdf](https://www.broads-authority.gov.uk/data/assets/pdf_file/0020/196211/Biosecurity-Guidance-Draft.pdf).

- v. If you are moving peat soils from site, how have you addressed biosecurity? [Have you filled out the biosecurity risk assessment template/guide?](#)

#### 6.7. Proposals that deposit material on peat/develop over peat

This guide has tended to address scenarios where peat is removed. It could be that, for example, a car park is developed on peat so the peat is covered by tarmac or concrete.



There are also instances in the Broads where excavated material has been disposed of on peat causing significant soil compaction and habitat damage.

In terms of developing over peat, there may be a need for some element of digging or piling and the peat policy and this guide will still apply. In general, however, other than the impact of removing the existing surface of the peat (which could be a habitat and therefore other policies/Acts come into force as set out in this guide) the other qualities of the peat are not adversely affected.

In terms of disposing of excavated material from elsewhere on peat, Policy DM18 of the adopted Local Plan relating to Excavated Material is of relevance.

So, schemes that do not necessarily excavate peat, but develop over peat may have a negative impact on peat. As applications are determined, this impact will be a key consideration.

#### 6.8. Transporting peat - emissions

Please note that the amount of carbon dioxide that peat can emit if dried out is very much more than the motor vehicle emissions associated with loading and moving peat elsewhere, locally, even considering the return journey of the particular vehicle.

Peat, if dried out, will emit 174kg of CO<sub>2</sub> per cubic metre of peat. This is a UK wide average figure and a standard estimate developed by Richard Lindsay of University East London for the RSPB. The actual amount of CO<sub>2</sub> of peat at a given site will vary, as peat is a spectrum and the wetter and more mineral the peat, the less CO<sub>2</sub> in a cubic metre.

A mid-sized HGV (rigid, up to 17 tonnes) has emissions of 0.88kgCO<sub>2</sub>/mile empty, 1.01kgCO<sub>2</sub>/mile 50% loaded, and 1.13kgCO<sub>2</sub>/mile 100% loaded.

Using excavated peat of 20 cubic metres as an example: The peat will emit 3.5 tonnes of CO<sub>2</sub> if left to dry out. Presuming the vehicle used to transport the peat off site is fully loaded and comes back empty (so double miles) (and excluding the fuel used to load and unload the vehicle), it is estimated that the peat can be moved up to 1,500 miles to result in less CO<sub>2</sub> emitted than if the peat is left to dry out.

We therefore consider moving peat to another area locally where it will be kept wet, subject to environmental permitting, is an option for disposing of excavated peat.

#### 6.9. Flood risk

When considering how to dispose of peat, in line with this guide, the impact on flood risk will need to be considered. For example, when backfilling or placing the peat in sunken areas, how will that affect flood storage? The EA have advised that for a smaller scheme, such as a mooring cut, the impact on flood storage will be negligible. But for larger schemes, the flood risk impact of where you dispose of the peat will need to be calculated and mitigated.



w. <u>How do your plans for disposing of peat affect flood risk? What calculations and mitigation, if needed, have you produced?</u>
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6.10. Excavating peat – County Matters

If schemes that result in the excavation of peat cover 1 hectare in area or 20,000 cubic metres in volume or more, the Broads Authority will consult with the Minerals and Waste teams at Norfolk County Council or Suffolk County Council (dependent on where the schemes is). Following consulting with the Minerals and Waste teams, it may be that the scheme becomes a County Matter which means that the County Council and the Broads Authority would jointly assess and determine separate applications for the extraction and subsequent use. It is acknowledged that schemes of this scale are rare in the Broads.



## 7. Key messages

- Peat has many important qualities and is a valuable resource.
- The Broads Authority aims to leave peat in situ.
- Schemes need to thoroughly justify why peat may be excavated.
- If a scheme needs to remove peat, it needs to be the minimal amount.
- The layout and scale of development and peat affected needs to be considered.
- If peat is excavated its properties need to be considered and protected.
- We will put organisations interested in peat (in terms of the properties, research and paleoenvironment) in touch with you.
- Any excavated peat needs to be placed in areas where it will remain wet.
- If this can't be achieved, you need to consider re-use of peat.
- You need to think about environmental permitting and biosecurity when moving soil off site.
- We urge all applicants to take advantage of our free pre-application advice.

## 8. Helpful links and where to go to get advice

NCA Profile: 80 The Broads (NE449), Natural England:

[publications.naturalengland.org.uk/publication/11549064](https://publications.naturalengland.org.uk/publication/11549064)

Positive Carbon Management of Peat Soils, Broads Authority: [www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0010/416494/BA\\_PeatCarbonManagement.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0010/416494/BA_PeatCarbonManagement.pdf)

Peatlands and Climate Change, Worrall et al, Scientific Review, December 2010: [www.iucn-uk-peatlandprogramme.org/sites/www.iucn-uk-peatlandprogramme.org/files/Review%20Peatlands%20and%20Climate%20Change,%20June%202011%20Final.pdf](http://www.iucn-uk-peatlandprogramme.org/sites/www.iucn-uk-peatlandprogramme.org/files/Review%20Peatlands%20and%20Climate%20Change,%20June%202011%20Final.pdf)

Fen Plant Communities of Broadland. Results of a Comprehensive Survey 2005-2009 (Broads Authority and Natural England): [www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0006/416391/Fen-plant-report-summary.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/416391/Fen-plant-report-summary.pdf)

Wetland and Waterlogged Heritage Survey NHPP Activity 3A5, Historic England, 2011 to 2015: [historicengland.org.uk/research/research-results/activities/3a5](http://historicengland.org.uk/research/research-results/activities/3a5)



Broads Authority Biosecurity Guidance: [https://www.broads-authority.gov.uk/data/assets/pdf\\_file/0020/196211/Biosecurity-Guidance-Draft.pdf](https://www.broads-authority.gov.uk/data/assets/pdf_file/0020/196211/Biosecurity-Guidance-Draft.pdf)



## Appendix A – Adopted Policy DM10 Peat Soils

See map: Appendix B: Location of peat soils

Sites of peat soils will be protected, enhanced and preserved. Where development is proposed on sites within the areas on the map, it may be necessary for an evaluation to be submitted to assess the impact of the proposal in relation to palaeoenvironments, archaeology, biodiversity provision and carbon content.

There will be a presumption in favour of preservation in-situ for peat, and development proposals that will result in unavoidable harm to, or loss of, peat will only be permitted if it is demonstrated that:

- i. There is not a less harmful viable option;
- ii. The amount of harm has been reduced to the minimum possible;
- iii. Satisfactory provision is made for the evaluation, recording and interpretation of the peat before commencement of development; and
- iv. The peat is disposed of in a way that will limit carbon loss to the atmosphere

Development that seeks to enhance biodiversity but may result in some peat removal will still need to demonstrate the criteria i to iv and that the biodiversity benefit will outweigh carbon loss.

Proposals to enhance peat and protect its qualities will be supported.

### Reasoned justification

Peat is an abundant soil typology in the Broads and an important asset, providing many ecosystem services:

- **Climate change:** The soils formed by the Broads wetland vegetation store 38.8 million tonnes of carbon<sup>9</sup>. Peat soils release previously stored carbon when they are dry. UK peats therefore represent both a threat and an opportunity with respect to greenhouse gas emissions. Correct management and restoration could lead to enhanced storage of carbon and other greenhouse gases in these soils, while mismanagement or neglect could lead to these carbon sinks becoming net sources of greenhouse gases.
- **Biodiversity:** Peat soils support internationally important fen, fen meadow, wet woodland and lake habitats. 75% of the remaining species-rich peat fen in lowland Britain is found in the Broads. Milk parsley, the food plant of the Swallowtail

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<sup>9</sup> NCA Profile 80, Natural England and the Broads Authority's Carbon Reduction Strategy:  
[www.broads-authority.gov.uk/data/assets/pdf\\_file/0011/400052/Carbon-reduction-strategy.pdf](http://www.broads-authority.gov.uk/data/assets/pdf_file/0011/400052/Carbon-reduction-strategy.pdf)



caterpillar, grows only on peat soils. Fen orchids have their UK stronghold in the Broads so the peat soils are critical for the survival of this species. Other rare and important plant and invertebrate communities (collection of species) are supported by the peaty soils.

- **Archaeology:** Historic England has identified the Broads as an area of **exceptional waterlogged heritage**. Because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, giving an insight into the past. Archaeology is discussed in more detail in the Heritage section of this Plan.
- **Palaeoenvironments:** The peat has accumulated over time and thus incorporates a record of past climatic and environmental changes that can be reconstructed through, for example, the study of its stratigraphy and pollen content, leading to increased knowledge of the evolution of the landscape.
- **Water:** Peaty soils help prevent flooding by absorbing and holding water like a sponge as well as filtering and purifying water. Peat can absorb large quantities of nutrient and other pollutants, although peat soils can under certain conditions release these chemicals back into the surrounding water.

While there is a certain irony in protecting the peat soils in an area where the lakes originated from peat extraction, peat is a finite resource. Land management that could impact on the quality of the peat soil includes land drainage, introduction of polluted water, burying the peat under hard surfaces or gardens, compacting peat and peat removal to change the land use.

Lowland fen is a priority habitat under the UK Biodiversity Action Plan and the EU Habitats Directive because of the quality and diversity of species it supports. Peat is not a habitat that can be recreated elsewhere as the deep soils take many thousands of years to form.

On occasion, for nature conservation benefits, peat can be removed to create shallow turf ponds or scrapes (areas of temporary open water) on areas of fen or scrub habitat to maximise the biodiversity value and hold back succession to woodland habitat. The removal of peat can also be necessary for conservation management – for example, the most biodiverse areas of UK fen occur on areas where the turf has been stripped and vegetation subsequently grown back. This policy allows for such operations, provided they can justify the proposal against the criteria set out in the policy.

The NPPF and NPPG only mention peat soils in relation to its excavation as a mineral resource, rather than the issue in the Broads relating to impact due to groundworks from development and inappropriate land management.

The policy seeks protection of peat soils through changes in the location of development in the first instance and then designing proposals to minimise disturbance to the qualities of

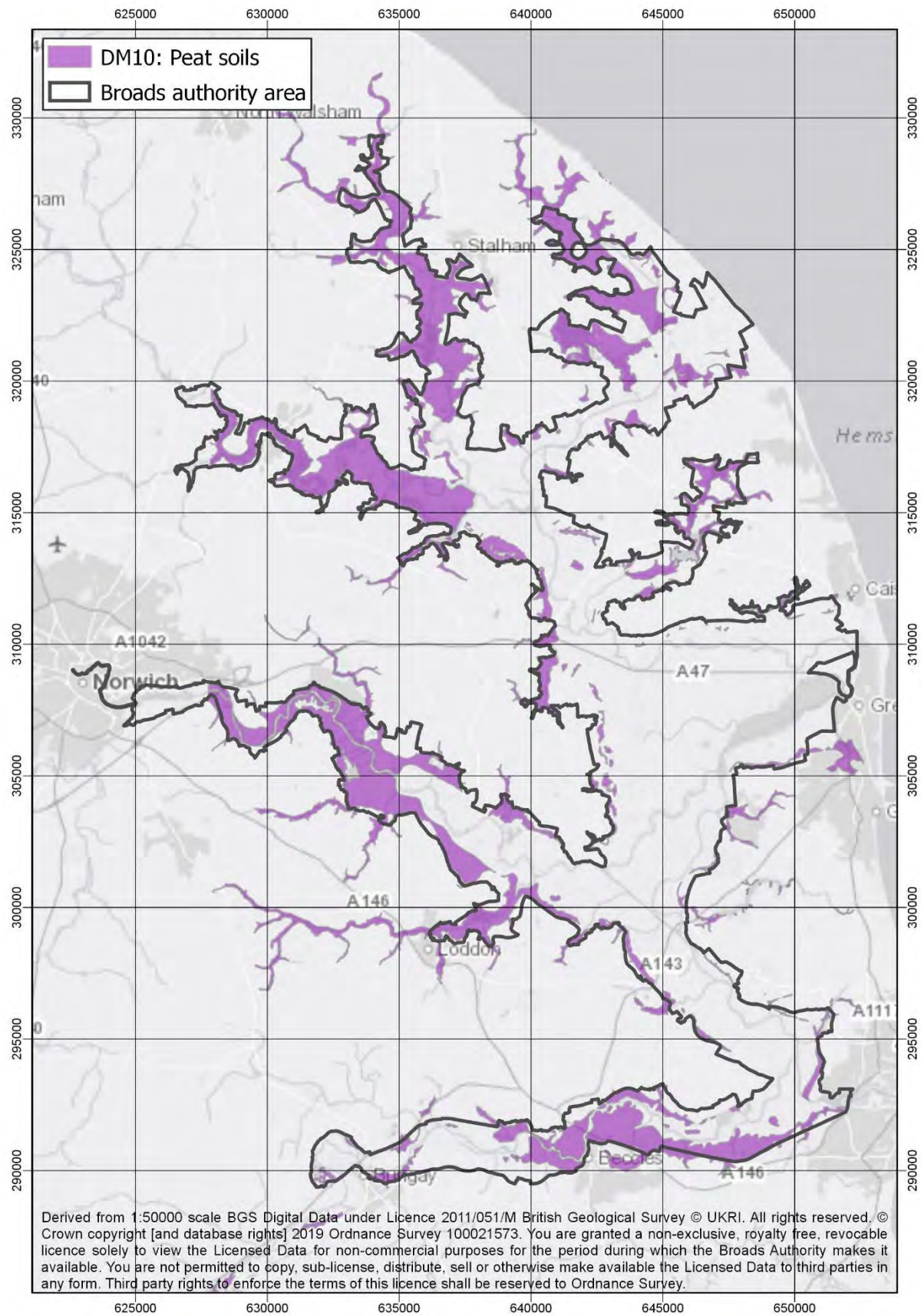


the peat and the amount of peat removed. Development proposed on areas of peat would require justification for the need to site the development on peat, and subsequently a peat assessment that shows how efforts have been made to reduce adverse impacts on peat. Proposals that would result in removal of peat are required to assess the archaeological and paleoenvironmental potential of peat and make adequate recordings prior to removal.

To prevent the loss of carbon to the atmosphere that is sequestered in peat soils, disposal is of great importance. The Authority expects peat to be disposed of in a way that maintains the carbon capture properties. Peat needs to go somewhere where it can remain wet (and hence retain its function to lock up carbon and prevent it being released into the atmosphere) or potentially provide a seedbank (the potential for ancient peat to provide a viable seedbank may need to be evidenced) or be reused for local benefit (for example by boosting organic matter in degraded arable soils). When dry, peat changes its properties and oxidizes, so transfer to the receiving site would need to be immediate.



## Appendix B – Map of peat





## Appendix C – Peat report template

### About the planning application/scheme

Planning Application Number:	
Address:	
Summary of application:	

### About this report

Report produced by:	
Date of report:	

### If you have completed on site peat assessments

Have you completed coring samples of the site?	
Provide details of how the coring was carried out and what the findings are. This could be a cross reference to the report.	

### About your development proposal

a. Why does the development have to go where it is proposed?	
b. What <b>alternative locations</b> have you considered? Why have you discounted these alternative locations?	
c. How can you reduce the amount/volume of peat that is to be developed? Please provide details. If you cannot reduce the volume, please say why.	
d. How can you change the <b>layout</b> of development to reduce the amount of peat soils affected? Please provide details. If you cannot change the layout, please say why.	



e. How can you reduce the <b>scale</b> of development to reduce the amount of peat soils affected? Please provide details. If you cannot change the scale, please say why.	
f. If amending the layout/scale of the site is not feasible, practical or viable and you intend to still develop on peat soils, you need to provide a robust justification for doing so.	

#### About the peat that is to be excavated

g. What volume of peat (m <sup>3</sup> ) will be excavated? How is this different to your initial plans?	
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#### Addressing the special qualities of peat

h. How have you considered and addressed archaeology on this site?	
i. Is there potential for archaeological finds on this site?	
j. How have you considered the biodiversity enhancement options on your peat site?	

#### Disposal of the excavated peat

k. Where do you intend to dispose of the excavated peat soils on site? Please show on a plan with anticipated volume of each receiving area.	
l. How will these areas ensure the peat is kept wet?	
m. When will the receiving areas be ready to receive peat soils? What is the time-period between excavation and backfilling/depositing? Have you	



arranged for the peat to be covered with tarpaulin for this period?	
n. Have you contacted any operators to see if they are willing and able to receive and use the excavated peat?	
o. Have you contacted local allotment organisations to see if they can make use of the peat?	
p. Have you looked into the need for an Environmental Permit for moving the excavated peat off site for re-use?	
q. What is the contingency plan for any peat left over after reducing the amount of peat excavated in for the first place, using the peat on site so it keeps wet, using the peat locally so it keeps wet and re-use of the peat?	
r. Have you contacted neighbouring landowners or Operational teams in the Environment Agency, Norfolk and Suffolk Wildlife Trust and Broads Authority to check what local opportunities may exist for receiving peat and keeping it wet?	
s. How have you discussed your approach to dealing with the excavated peat with your contractor? Have they confirmed the approach is feasible?	
t. Have you looked into the need for an Environmental Permit for moving the excavated peat offsite?	
u. If you are moving peat soils from site, how have you ensured you are going to be in accordance with	



Environmental Permitting requirements?	
v. If you are moving peat soils from site, how have you addressed biosecurity? <a href="#">Have you filled out the biosecurity risk assessment template/guide?</a>	
w. <a href="#">How do your plans for disposing of peat affect flood risk? What calculations and mitigation, if needed, have you produced?</a>	



## Appendix E – Privacy notice

### Personal data

The following is to explain your rights and give you the information you are entitled to under the Data Protection Act 2018. Our Data Protection Policy can be found here:

[http://www.broads-authority.gov.uk/data/assets/pdf\\_file/0003/1111485/Data-Protection-Policy-2018.pdf](http://www.broads-authority.gov.uk/data/assets/pdf_file/0003/1111485/Data-Protection-Policy-2018.pdf).

The Broads Authority will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will be made publicly available as part of the process. It will not however be sold or transferred to third parties other than for the purposes of the consultation.

#### 1. The identity of the data controller and contact details of our Data Protection Officer

The Broads Authority is the data controller. The Data Protection Officer can be contacted at [dpo@broads-authority.gov.uk](mailto:dpo@broads-authority.gov.uk) or (01603) 610734.

#### 2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters. We will also contact you about later stages of the Local Plan process.

#### 3. Our legal basis for processing your personal data

The Data Protection Act 2018 states that, as a Local Planning Authority, the Broads Authority may process personal data as necessary for the effective performance of a task carried out in the public interest, i.e. a consultation.

#### 4. With whom we will be sharing your personal data

Your personal data will not be shared with any organisation outside of MHCLG. Only your name and organisation will be made public alongside your response to this consultation.

Your personal data will not be transferred outside the EU.

#### 5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for 16 years from the closure of the consultation in accordance with our Data and Information Retention Policy. A copy can be found here <http://www.broads-authority.gov.uk/about-us/privacy>.

#### 6. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:



- ~~a) to see what data we have about you~~
- ~~b) to ask us to stop using your data, but keep it on record~~
- ~~c) to ask to have all or some of your data deleted or corrected~~
- ~~d) to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.~~

~~7. Your personal data will not be used for any automated decision making.~~



# Planning Committee

05 March 2021

Agenda item number 12

## Norfolk Strategic Planning Framework version 3- Endorsement

Report by Planning Policy Officer

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### Summary

The Norfolk Strategic Planning Framework (NSPF) sets out agreements relating to cross boundary, strategic planning matters. This is the third version of the NSPF to be produced and it is now ready for endorsement.

### Recommendation

It is recommended that Planning Committee endorse the NSPF version 3, and recommend it to the Broads Authority for adoption.

---

## 1. Introduction

- 1.1. The Norfolk Strategic Planning Framework (NSPF) has been produced by all the Local Planning Authorities (LPAs) in Norfolk, with the involvement of relevant bodies such as the Environment Agency. The NSPF sets out guidelines for strategic planning matters across the county and beyond, and demonstrates how the LPAs will work together under the Duty to Co-operate, through a series of agreements on planning related topics. The Framework has been put together by officers from the Norfolk LPAs, under the oversight of a member level group comprising representatives from all the authorities.
- 1.2. Although the Framework is not a statutory planning document, not having been through the full process required to achieve such status, it sets out the strategic matters to consider in the production of Local Plans by the constituent Norfolk LPAs.
- 1.3. The Framework sets out a proposed Spatial Vision and shared objectives for the Norfolk LPAs, having regard to the main spatial planning issues of population growth, housing, economy, infrastructure and environment. There are a number of “agreements” which explain how the LPAs will seek to deal with the matters through their spatial planning role. These agreements are set out in bold in the document, so are easy to identify. While the Framework is not an adopted planning document in its own right, it can be seen as a guide for future planning work.



- 1.4. The NSPF will be reviewed regularly, as the Duty to Co-operate requires authorities to work together in 'an ongoing and meaningful way' and Statements of Common Ground must 'reflect the most up to date position in terms of joint working across the area'.
- 1.5. As the Local Plan for the Broads starts to be reviewed, the findings of the joint work and the agreements will inform the new Local Plan.
- 1.6. Finally, whilst the NSPF covers Norfolk, there is part of the Broads in Suffolk. The Authority works closely and meets quarterly with East Suffolk Council and Suffolk County Council. A Statement of Common Ground with the relevant Suffolk based authorities will be produced to support the new Local Plan.

## 2. NSPF Member Forum

- 2.1. The NSPF Member Forum consists of Leaders or Planning Portfolio holders of all LPAs in Norfolk. They meet quarterly and oversee the production of the NSPF. They are not a decision-making body; any decisions need to be made/ratified by each individual LPA.
- 2.2. At the January 2021 NSPF Member Forum meeting, the NSPF was generally supported. There were some comments made on the Older Persons Accommodation report and the Green Infrastructure and Recreation Avoidance Mitigation Strategy (GI RAMS) and these are discussed later. However, generally the approach of these reports was endorsed and so too were the related agreements in the NSPF.
- 2.3. The NSPF Member Forum endorsed the NSPF version 3 and recommend that the individual LPAs also endorse it.
- 2.4. Please note that since the Member Forum meeting, there have been some minor amendments to the NSPF in relation to GI RAMS work and reference to the Marine Management Organisation (MMO). These are set out at Appendix 4. These changes are considered minor and do not affect the overall NSPF significantly. It is considered the NSPF version 3 can still be endorsed by individual LPAs.

## 3. Version 3 of the NSPF

- 3.1. As well as a general update to the NSPF, this third version also addresses some important issues. The updated NSPF is at Appendix 1.
- 3.2. The following issues are included in the NSPF, and the corresponding supporting information will be published alongside the NSPF.
- 3.3. **Shared Objectives/Guidance for extending 4G coverage and the rollout of 5G infrastructure in the County of Norfolk.**  
The Norfolk Strategic Planning Member Forum set up an officer group with the support of Mobile UK, to explore how to improve 4G and 5G infrastructure roll-out in Norfolk. This group produced the shared objectives/guidance that is at Appendix 2. This sets out what operators and Norfolk's local authorities need to do to improve digital connectivity.



**3.4. Climate change and the planning system summary document and supporting documents on each subject area.**

The Climate Change group was set up late Summer in 2019, and the group has reviewed information in relation to climate change with a specific focus on the role and impact on Local Plans and the planning system generally. It has also explored some of the emerging policy work around climate change and background information, such as the Report from the Committee on Climate Change that helped inform the Government's changes to the Climate Change Act 2008, and the adoption of the 2050 net zero target. The group identified the key areas of influence for planning and recommendations to be taken forward across the county. The areas explored include water, energy usage, electric vehicles, community lead heating schemes, movement, location of development, point sources, parking and design standards. These are set out in Appendix 3.

**3.5. Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GI RAMS).**

Place Services were commissioned earlier in 2019 to produce a county-wide Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy.

**3.5.1. The GI RAMS work includes:**

- a) A review of the strategically significant opportunities for the provision of new and/or enhanced Green Infrastructure in the county;
- b) Understanding of the current management measures for visitors to the sites designated as of European interest for conservation and evidence for recreational disturbance, including any disturbance 'hotspots' or particular concerns with locations proposed for housing growth;
- c) Develop the mitigation necessary to avoid significant adverse effects from 'in-combination' impacts from residential development, and identify a detailed programme of strategic mitigation measures which will be recommended to be funded by developer contributions from residential development schemes.

**3.5.2. It is important to note that:**

- a) Evidence indicates that all dwellings in Norfolk are likely to result in a significant effect on protected sites, through recreational disturbance.
- b) To mitigate the impact, there is potentially the need for a tariff charged per dwelling that could be collected and spent county-wide. This tariff is calculated to be around £200 per dwelling.
- c) There will be a next phase of work that looks into implementation and delivery of the report.

**3.5.3. At the January Member Forum meeting, the tariff was discussed. Whilst there was support for the idea of a tariff, there were concerns and queries as follows:**



- i. What is the justification for one zone of influence?
- ii. Why is the tariff to be paid on employing people, rather than infrastructure?
- iii. How will paying into a county-wide pot work? What about development in one part of the county that is quite removed from a protected site elsewhere in the county?

3.5.4. A further meeting of the Norfolk NSPF Member Forum, to discuss the GI RAMS report in more details, is set up for 8 March 2021 which is after the meeting of the March Planning Committee. The answers to these queries and the results of the discussion of the meeting on 8 March will be reported to Broads Authority on 19 March.

3.5.5. It is important to note the following:

- The report is being finalised, in particular in relation to what the funding would be spent on (the strategy) following the comments made at the NPSF Member Forum in January.
- The final report will be presented to a future Planning Committee.
- The findings of the emerging report relating to the need for a tariff and the scale of the tariff (of around £205) were generally supported at the January NSPF Member Forum, and the wording in the NSPF is deemed adequate yet flexible enough to enable the delivery of the GI RAMS work when finalised.

#### 3.6. **Older Persons Accommodation and Support Needs Study.**

Three Dragons have been commissioned to complete an Older Persons Accommodation and Support Needs Study. The study is being finalised and will be presented to a future Planning Committee meeting. The report is evidence base and the need to ensure we consider the needs of older people is reflected in the NSPF.

## 4. Financial implications

- 4.1. The Broads Authority contribute £5,000 per year towards the NSPF and joint working in Norfolk.
- 4.2. The RAMS tariff will mean that developers have to pay around £200 per dwellings, which is cheaper than providing their own bespoke mitigation for their scheme.

## 5. Risk implications

- 5.1. No significant risks to report.

Author: Natalie Beal

Date of report: 15 February 2021

Appendix 1 – NSPF version 3

Appendix 2 - Shared Objectives for extending 4G coverage and the rollout of 5G infrastructure in the County of Norfolk



Appendix 3 - Climate change and the planning system summary document and supporting documents on each subject area

Appendix 4 – Changes to NSPF version 3 since the January 2021 Member Forum



# Norfolk Strategic Planning Framework

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## Shared Spatial Objectives for a Growing County and Statement of Common Ground

January 2021





## Signatories

- Breckland District Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Natural England
- Environment Agency
- Anglian Water
- Marine Management Organisation
- New Anglia Local Enterprise Partnership
- Active Norfolk
- Water Resources East

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The authors would like to thank the following organisations for their support in the production of this document:

- Breckland District Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Suffolk County Council
- Babergh & Mid Suffolk District Councils
- East Suffolk Council
- West Suffolk Council
- Fenland District Council
- East Cambridgeshire District Council
- South Holland District Council
- Natural England
- Environment Agency
- Wild Anglia
- Anglian Water
- New Anglia Local Enterprise Partnership
- UK Power Networks
- Cambridgeshire and Peterborough Combined Authority
- Norfolk and Waveney CCG
- NHS Sustainability and Transformation Partnership Estates for Norfolk and Waveney
- Mobile UK



## Contents

SIGNATORIES .....	2
ACKNOWLEDGEMENTS .....	2
SUMMARY OF FORMAL AGREEMENTS WITHIN THE STATEMENT OF COMMON GROUND .....	2
SECTION 1 – INTRODUCTION .....	7
1.1 Purpose of this Document.....	7
1.2 Governance Arrangements for the creation of this document .....	8
1.3 Changes to the document .....	9
1.4 Timescale for and coverage of the Document .....	10
SECTION 2 – VISION AND OBJECTIVES.....	11
2.1 Introduction.....	11
2.2 Proposed Spatial Vision .....	13
2.3 Proposed Shared Objectives .....	13
SECTION 3 – UNDERSTANDING THE COUNTY.....	16
3.1 Administrative Boundaries.....	16
3.2 Housing Markets .....	17
3.3 Strategic Functional Economic Market Areas .....	20
3.4 Implications of Changing Infrastructure on Market Areas .....	22
3.5 Other Joint Initiatives and Neighbouring Strategic Partnerships .....	24
SECTION 4 – PROJECTIONS OF GROWTH.....	26
4.1 Population Projections.....	26
4.2 Household Projections .....	29
4.3 Employment Projections .....	29
SECTION 5 – THE ECONOMY .....	31
5.1 Strategic Principles of Economic Success.....	32



<b>5.2 Context .....</b>	<b>33</b>
5.2.1 Coronavirus Impacts.....	34
5.2.2 Climate Change .....	36
5.2.3 Norfolk's Key Economic Sectors .....	36
5.2.4 Sector impact of the Coronavirus.....	40
<b>5.3 Strategic Employment Sites .....</b>	<b>41</b>
<b>5.4 Key Cross-Boundary Economic Issues and Interventions .....</b>	<b>43</b>
5.4.1 The role of Greater Norwich .....	43
5.4.2 Cambridge to Norwich Technology Corridor.....	44
5.4.4 Offshore Energy Sector / Ports of Great Yarmouth & Lowestoft .....	46
5.4.5 Norfolk Coast, the Broads and the Brecks.....	46
5.4.6 A10 corridor .....	47
<b>SECTION 6 – HOUSING .....</b>	<b>48</b>
<b>6.1 Introduction.....</b>	<b>48</b>
<b>6.2 Existing targets, supply, and delivery rates up to 2021.....</b>	<b>50</b>
<b>6.3 Future Housing Demand and Need until 2036.....</b>	<b>51</b>
The Broads.....	52
Implications of the City Deal for Housing.....	53
<b>6.4 Type of Homes .....</b>	<b>54</b>
Specialist types of accommodation.....	54
Elderly People.....	55
Student Housing and the OAN .....	56
Accommodation needs of Gypsies, Travellers, and other types of accommodation .....	57
<b>6.5 Capacity and Distribution.....</b>	<b>58</b>
<b>6.6 Delivering Housing Growth .....</b>	<b>58</b>
<b>SECTION 7 – HEALTH.....</b>	<b>60</b>
<b>7.1 Introduction.....</b>	<b>60</b>
<b>7.2 Principles .....</b>	<b>60</b>
<b>7.3 Healthy living and Wellbeing – through better design.....</b>	<b>61</b>
<b>7.4 Implementing Healthy Design .....</b>	<b>63</b>
<b>7.5 Health Infrastructure Protocol .....</b>	<b>64</b>
<b>SECTION 8 – CLIMATE CHANGE.....</b>	<b>65</b>
<b>8.1 Introduction.....</b>	<b>65</b>
<b>8.2 Background.....</b>	<b>65</b>



<b>8.3 Climate Change Next Steps .....</b>	<b>66</b>
<b>SECTION 9 – INFRASTRUCTURE AND ENVIRONMENT.....</b>	<b>67</b>
<b>9.1 Introduction.....</b>	<b>68</b>
<b>9.2 Utilities .....</b>	<b>69</b>
<b>9.3 Electricity .....</b>	<b>70</b>
<b>9.4 Water.....</b>	<b>71</b>
<b>9.5 Digital Connectivity .....</b>	<b>75</b>
Broadband.....	75
Mobile Connectivity .....	77
Coverage in Norfolk.....	77
<b>9.6 Education .....</b>	<b>80</b>
Education .....	80
<b>9.7 Transportation .....</b>	<b>81</b>
Rail.....	85
<b>9.8 Coastal and Marine Planning .....</b>	<b>86</b>
<b>9.9 Flood Management and Green Infrastructure .....</b>	<b>88</b>
Flood Management .....	88
Green Infrastructure and the Environment .....	91
<b>9.10 Minerals and Waste .....</b>	<b>95</b>
Minerals .....	95
Waste .....	97
<b>SECTION 10 – CONCLUSIONS AND NEXT STEPS.....</b>	<b>99</b>
<b>APPENDIX 1 – NSPF CONTACTS.....</b>	<b>101</b>
<b>APPENDIX 2 – CROSS BORDER COOPERATION INITIATIVES .....</b>	<b>102</b>



## Summary of Formal Agreements within the Statement of Common Ground

Please Note: 'Norfolk Planning authorities' and 'Norfolk Authorities' refers to the 7 district authorities that make up Norfolk (see section 1.4), the Broads Authority and Norfolk County Council.

**Agreement 1** - That when preparing new Local Plans which seek to identify levels of Objectively Assessed Need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.

**Agreement 2** - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.

**Agreement 3** - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

- To realise the economic potential of Norfolk and its people\*
- To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change\*
- To address housing needs in Norfolk\*
- To improve the quality of life and health for all the population of Norfolk\*
- To improve and conserve Norfolk's rich and biodiverse environment\*

\*Full details of each objective are in section 2 of this document

**Agreement 4** –To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

**Agreement 5** - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

**Agreement 6** - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.

**Agreement 7** - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

**Agreement 8** – Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan

**Agreement 9** - The list of locations in section 5 are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses.



**Agreement 10 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.**

**Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.**

**Agreement 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.**

**Agreement 13 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.**

**Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.**

**Agreement 15 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.**

**Agreement 16 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.**

**Agreement 17 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:**

- **Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.**
- **Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.**

**Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.**



**Agreement 19 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to give consideration to the approaches in the NSPF Climate Change research Paper of this report when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.**

**Agreement 20 - Norfolk Planning Authorities agree to work together to investigate the production of a county wide climate change best practice guide/design guide and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles.**

**Agreement 21– Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.**

**Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.**

**Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.**

**Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high-speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.**

**Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.**



**Agreement 26: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.**

**Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues:**

- Infrastructure
- Governance
- Heritage
- Marine Protected areas
- Marine and coastal employment
- Sustainable port development
- Energy – offshore wind and oil and gas
- Access for tourism and recreation
- Sustainable and aquaculture fisheries in small harbour towns
- AONB and Seascape and landscape (character and natural beauty)
- Biodiversity
- Marine aggregates
- Cabling
- Water quality/water supply and sewerage
- Climate change/ Coastal erosion and coastal change management

**Agreement 28: In recognition of:**

**a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;**

**b) the pressure that development in Norfolk could place on these assets; and**

**c) the importance of ecological connections between habitats**

**Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.**



## **Agreement 29 :**

**It is agreed that:**

- 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand.**
- 2) A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand.**
- 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development.**
- 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy.**
- 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period.**
- 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns. Priority for the location of new waste management facilities will be given to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.**
- 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.**

**Agreement 30: In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.**

**Agreement 31: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.**



## Section 1 – Introduction

### 1.1 Purpose of this Document

Norfolk's Local Planning Authorities (including Norfolk County Council) have a long track record of working together to achieve shared objectives. In early 2015 they, working through its strategic planning member forum, agreed to formally cooperate on a range of strategic cross-boundary planning issues through the preparation of the Norfolk Strategic Planning Framework (NSPF).

The aim of producing the framework was to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of future Local Plans;
- Demonstrate compliance with the duty to co-operate and consistency with the revised National Planning Policy Framework;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high level plans (such as the New Anglia LEP's Economic Strategy, Local Industrial Strategy<sup>1</sup> and Covid 19 Economic Recovery Restart Plan<sup>2</sup>); and
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

The previous version of the NSPF was endorsed by all Norfolk planning authorities in October 2019 it considered the impact of the revised National Planning Policy Framework (NPPF)<sup>3</sup> and the requirement to apply a new standardised methodology to assessing housing need, and produce statements of common ground. It is clear that Norfolk's local planning authorities needed to continue to work closely together to address strategic planning matters and therefore the Norfolk Strategic Planning Member forum agreed to continue to formally cooperate on strategic planning activities and to update the NSPF.

This document continues to fulfil the requirement for Norfolk Local Planning Authorities to produce a statement of common ground setting out the effective and on-going joint working across the county on strategic planning matters. It addresses key cross-boundary issues and progress in cooperating to address these.

A number of working groups have been tasked with updating the document. These groups consist of Local Authority staff assisted by other organisations including the Environment Agency, Natural England NHS Sustainability and Transformation Partnership (STP), Anglian Water, UK Power Networks, Active Norfolk and the New Anglia Local Enterprise Partnership. Our thanks is extended to all those who have contributed to this work which has informed this framework.

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<sup>1</sup> [New Anglia LEP Local Industrial Strategy - https://newanglia.co.uk/local-industrial-strategy/](https://newanglia.co.uk/local-industrial-strategy/)

<sup>2</sup> See [New Anglia LEP Covid 19 Economic Recovery Restart Plan - https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf](https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf)

<sup>3</sup> See [National Planning Policy Framework - https://www.gov.uk/government/publications/national-planning-policy-framework--2](https://www.gov.uk/government/publications/national-planning-policy-framework--2)



For further information on the work of the Norfolk Strategic Planning Member Forum and about the process for updating this framework please see the Forum's website:

[Norfolk Strategic Planning Member Forum - www.norfolk.gov.uk/nsf](http://www.norfolk.gov.uk/nsf)

This document is intended to be strategic in nature. It provides only an overview of background information and shared research. A wealth of information has been produced by the working groups; however a decision has been made to keep this document concise and to concentrate on the matters where there is a clear need for agreement between the Local Authorities. We acknowledge that not all factors have been considered, but where appropriate, relevant additional information has been highlighted. The absence of certain issues does not diminish their importance or value.

Details of the lead contact in each local Council on strategic planning matters are included in Appendix 1.

## **1.2 Governance Arrangements for the creation of this document**

### **Norfolk Strategic Planning Member Forum**

The development of this Framework is overseen by the Norfolk Strategic Planning Member Forum. This consists of one Member from each of the Borough Council of King's Lynn and West Norfolk, Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, South Norfolk Council and the Norfolk County Council. The membership of the group will be determined by each authority via annual nomination preferably of the Planning Portfolio Member or equivalent for each authority. The operation of the Member Forum and officer support group is governed by formal terms of reference available from [the Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf](http://www.norfolk.gov.uk/nsf). Chairmanship is determined by the Forum and reviewed each year. The meetings of the Forum are held every three months and held in public. An agenda and papers are circulated in advance of each meeting and informal action notes will be taken and published on the Norfolk Strategic Planning Framework website. Each authority endorses this document through their relevant committees or cabinets.

### **Norfolk Strategic Planning Officers Group**

The Norfolk Strategic Planning Officers Group consists of key planning policy officers from each Planning Authority in Norfolk as well as other key statutory agencies. The group reviews the progress of the document production on a monthly basis. The group have ensured that the document progresses to the timetable and meets any government and legislative requirements.

### **The Steering Groups**

The steering group is responsible for the creation of the document, receiving reports from the Technical Sub groups to help in the authoring process.

### **Technical Sub groups**

The Technical Sub Groups provide technical evidence and make recommendations in relation to the document to the Steering Group. They consist of officers from the Authorities involved in the production of the document and a range of bodies who have expertise and interest in matters related to the group's subject.



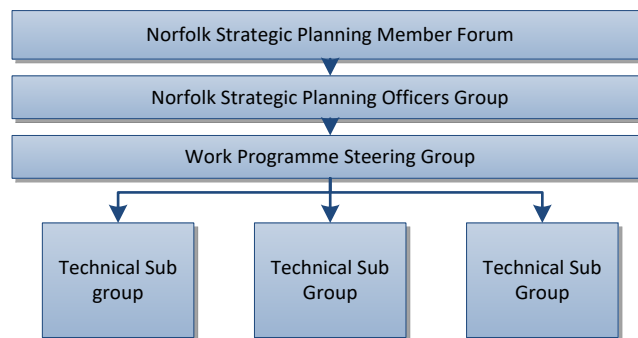


Figure 1: Governance arrangements for the Norfolk Strategic Planning Framework

### 1.3 Changes to the document

In updating this document Norfolk's local planning authorities sought to ensure the NSPF is up to date with all relevant information and legislation. The document has been updated after the completion of a number of county wide studies looking at:

- Green infrastructure and Recreational avoidance and mitigation and the introduction of a county wide tariff to mitigate against the impact on existing Natura 2000 sites
- The housing needs of the elderly and the types of accommodation required
- Actions that local planning authorities can take to help mitigate and adapt to climate change
- A new health section to highlight the importance of health provision and health living as a strategic cross boundary issue
- Shared Guidance on the roll out of 5G and to help improve fibre broadband connectivity
- Updates to remaining sections to take account of new or updated information

Whilst this document was being prepared the government announced a consultation on landmark reforms to the planning system under the Planning for the Future White Paper<sup>4</sup>. The key aims of the changes are to speed up and modernise the planning system and get the country building. One of the proposed changes will be to abolish the Duty to Cooperate. However the government is giving further consideration to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared. Once further clarification is provided by central government through new legislation and a revised National Planning Policy Framework it will become clear if Norfolk Planning Authorities can continue to address strategic planning matters through a revision of this document. In the meantime partner authorities remain committed to cooperative processes and updating this document.

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<sup>4</sup> See [Planning for the Future White Paper - https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system](https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system)



## 1.4 Timescale for and coverage of the Document

This document relates to the whole of Norfolk and all Norfolk authorities which include:

Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, Norwich City Council, North Norfolk District Council, South Norfolk Council and Norfolk County Council.

This Statement of Common Ground has been prepared with the understanding that the signatories undertake their statutory duties in accordance with relevant legislation, policy and guidance; and in the context of other relevant Statements of Common Ground, Memoranda of Understanding and Position Statements which they are party to.

All Norfolk Local Planning Authorities have agreed to plan to at least 2036 in their next generation of local plans. This is reflected in the evidence base for this framework insofar as it seeks to provide statistical information looking ahead to this period. This is also the date by when objectives are to be achieved. However, in parts, notably the vision, it is necessary for the document to take a longer term view.

**Agreement 1 - That when preparing new Local Plans which seek to identify levels of Objectively Assessed Need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.**



## Section 2 – Vision and Objectives

### 2.1 Introduction

Norfolk is a diverse County. It covers a land area of 5,370 sq. km (2,074 sq. miles) and has a population of 907,760<sup>5</sup>. It is a largely rural county with a relatively low population density, although over half of the population lives in the built up areas of Norwich, Great Yarmouth and King's Lynn and a number of market towns<sup>6</sup>. These built up areas have a very considerable stock of historic assets and can offer a very attractive quality of life to residents.

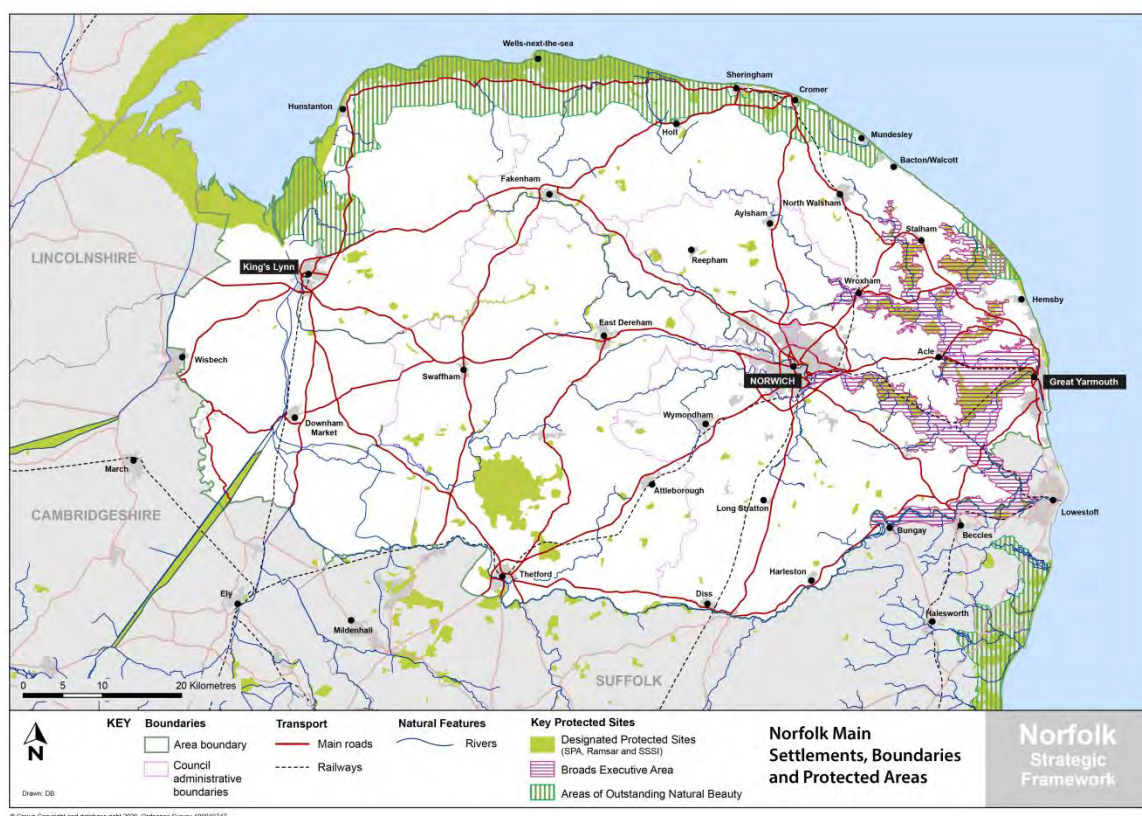


Figure 2: Map of Norfolk's main settlement, Authority boundaries, major transport connections and land-based protected areas. 2021

Norfolk borders Suffolk to the south, Cambridgeshire to the southwest, and Lincolnshire to the west, and has a long coastal boundary stretching from The Wash to the south of Great Yarmouth, this area is covered by the East Inshore Marine Plan<sup>7</sup>. It contains many environments which are highly valued for their landscape and seascape, and for their biodiversity and/or geodiversity interests. In

<sup>5</sup> Mid year 2019 ONS estimate see [Norfolk Insight web page - http://www.norfolkinsight.org.uk/population](http://www.norfolkinsight.org.uk/population)

<sup>6</sup> The 21 largest others centres are Attleborough, Aylsham, Cromer, Dereham, Diss, Downham Market, Fakenham, Harleston, Holt, Hunstanton, Loddon, Long Stratton, North Walsham, Sheringham, Stalham, Swaffham, Thetford, Wroxham/Hoveton, Wymondham, Watton, Wells-Next-The-Sea

<sup>7</sup> See [East Inshore Marine Plan - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/312496/east-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/312496/east-plan.pdf)



particular, the Norfolk Coast Area of Outstanding Natural Beauty, the Brecks and the Broads, which is a unique network of protected rivers and lakes that extends partly into Suffolk and has the equivalent status to a National Park.

Norfolk's economy is also diverse. It is home to a number of world class industries such as on the Norwich Research Park and the offshore energy sector in Great Yarmouth. Employment levels are growing; there is a highly skilled and versatile population with good graduate retention rates and improving links to the thriving markets of Cambridge, London and the wider South East. However, it is not without challenges; gross value added per job in the area remains below the UK average<sup>8</sup>, there are high levels of deprivation especially in urban areas and skill levels in the workforce are relatively low. The Economic Strategy (which was produced by the New Anglia Local Enterprise Partnership in 2017) identifies a number of interventions designed to significantly uplift economic performance in Norfolk.

Norfolk's infrastructure is under developed compared to many other parts of the wider South and East of England. For many years Norwich was the largest city in England not connected to the motorway network by a dual carriageway. Cross county trips tended to be slow and unreliable and rail journey times from London were comparable to places in the north of England such as York and Warrington. However, the dualling of the A11 and the completion of the Broadland Northway (previously known as the Northern Distributor Road) improved travel time and connectivity considerably, and announcements on both the A47 and the Greater Anglia rail franchise have the potential to improve this further. Norwich Airport, the busiest airport in East Anglia, offers regular flights to various destinations in the UK and Europe. Many of the key road and rail links connecting Norfolk to the rest of the UK are still in need of improvement as are many of the links within the County. The need to enhance capacity of infrastructure networks can add considerable costs and increase delays to development.

Patchy mobile coverage is a continuing frustration to residents and businesses<sup>9</sup>. However, the picture regarding superfast broadband coverage is rapidly improving; currently 95% of the county's homes and businesses are able to access speeds of 24Mbps+<sup>10</sup>, up from 42% in 2012<sup>11</sup>.

Through working together and with government, businesses and residents Norfolk's Local Authorities hope to successfully address the challenges faced and maximise the potential of the County. As a basis for guiding this shared endeavour, the following shared vision and objectives have been agreed by the Strategic Planning Member Forum. For further information on the background to this material please see the papers previously considered by the Member Forum<sup>12</sup>.

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<sup>8</sup> See [NEW Anglia LEP Economic Strategy page 7 - https://newanglia.co.uk/wp-content/uploads/2020/03/New-Anglia-LEP-Economic-Strategy-Annual-Progress-Report-FINAL-WEB-version-medium-res.pdf](https://newanglia.co.uk/wp-content/uploads/2020/03/New-Anglia-LEP-Economic-Strategy-Annual-Progress-Report-FINAL-WEB-version-medium-res.pdf)

<sup>9</sup> See [County Council Mobile Map page - www.norfolk.gov.uk/mobilemap](http://www.norfolk.gov.uk/mobilemap)

<sup>10</sup> See Better Broadband for Norfolk Website

<sup>11</sup> See Better Broadband for Norfolk Information Sheet 26 (26 May 2017)

<sup>12</sup> See [papers for the 13th October 2016 Member Forum at www.norfolk.gov.uk/nsf](http://www.norfolk.gov.uk/nsf)



## 2.2 Proposed Spatial Vision

**Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.**

“By the middle of the 21<sup>st</sup> century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural, built and historic environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life and Health for residents. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel.”

## 2.3 Proposed Shared Objectives

**Agreement 3 - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):**

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership Economic Strategy, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements and across county boundaries to strengthen inward investment;
- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure;
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities;
- recognising the role of our city centre and the need to re-examine and revitalise the role of town centres as a focus for investment and enhancing the quality of life for residents;
- recognising that the long term conservation, investment in and enhancement of Norfolk's natural environment and heritage is a key element of the county's competitiveness and contributor to the Norfolk economy;
- ensuring a healthy workforce through well planned sustainable communities where people can walk and cycle to work or use public transport or work effectively from home;
- recognise that housing underpins economic growth;
- Maximising the opportunity a clean/green economic recovery presents for the region and the new jobs which will be required to achieve the Governments net zero target



To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- reducing unnecessary car use and supporting the roll out of new technologies (such as Electric Vehicles and alternative fuels eg hydrogen) and alternative methods of transport including public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

Together these measures will help create healthier more sustainable communities.

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes in line with the Economic Strategy of the New Anglia LEP, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

To improve the quality of life and health for all the population of Norfolk by:

- promoting development and design which seeks to actively improve health, prevent ill health and tackle widespread health inequalities
- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at local level.



To improve and conserve Norfolk's rich and biodiverse environment by:

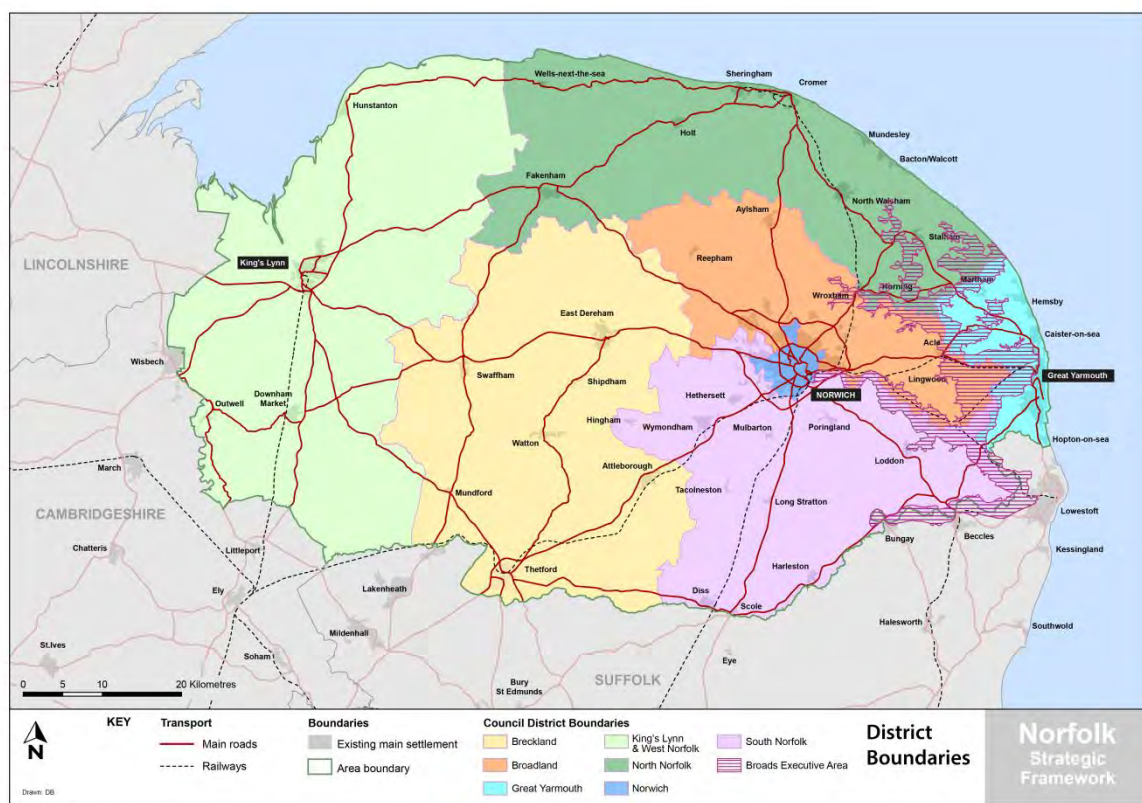
- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;
- protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- minimising, where possible, development on the best and most versatile agricultural land;
- where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- protecting, maintaining and enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources;
- Protecting and enhancing water, air, soil and other natural resource quality where possible; and
- Leaving the environment in a better state for future generations.



## Section 3 – Understanding the County

### 3.1 Administrative Boundaries

Within Norfolk there are seven separate District Council areas<sup>13</sup> (as shown in Fig.2), each of which is a Local Planning authority. Overlying parts of five of these areas (and also part of East Suffolk District in Suffolk) is the Broads Authority which is the Local Planning Authority for its area rather than the District Councils. The Broads Authority Executive Area (in which the Broads Authority are the planning authority) overlays these administrative areas and is illustrated in the figure below.



**Figure 3: Map of Norfolk District boundaries and the major transport connections. 2021**

In addition to the eight Local Planning Authorities the County Council are also a Local Planning Authority responsible for minerals and waste planning as well as certain operational development related to their functions (most notably for educational development).

The 25 Year Environment Plan requires that marine plans are adopted by 2021. The Marine and Coastal Access Act 2009 provides the domestic legislative basis for the marine planning system. The Marine Policy Statement was adopted by all UK Administrations in March 2011, which provides the policy framework for the preparation of all UK marine plans. It contains a range of policy objectives and considerations, which were used to inform decision-making in the absence of a marine plan.

<sup>13</sup> Breckland District Council, Broadland District Council, Great Yarmouth Borough Council, King's Lynn and West Norfolk Borough Council, North Norfolk District Council, Norwich City Council and South Norfolk Council.



Marine plans translate the Marine Policy Statement into detailed policy and spatial guidance for each marine plan area. Section 58 of the Marine and Coastal Access Act 2009 states that all public bodies making authorisation and enforcement decisions which affect or might affect the UK marine area, must do so in accordance with the adopted marine plan. All other decisions must be made with regard to the Marine Plan, for example, when a public or local authority creates or reviews a local plan.

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority for England), the Marine Management Organisation (MMO) is responsible for preparing marine plans for English inshore and offshore waters. The East Marine Plans will inform and guide decision-makers on developments which may have an impact on the marine and coastal environment. As the marine planning authority for England, the Marine Management Organisation (MMO) is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, the East Inshore Marine Plan applies up to the mean high water springs mark, which includes the tidal extent of any rivers. The East Marine Plan will therefore overlap with terrestrial plans which generally extend to the mean low water springs mark. On 2 April 2014 the East Inshore and Offshore Marine Plans were published, becoming a material consideration for public authorities with decision making functions.

Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development.

The economic geography of Norfolk is complex as it reflects a multicentric area and boundaries tend to be fuzzy. Overall the County has a relatively high level of self-containment as the vast majority of the resident workforce stay in Norfolk for work, although there are some strong functional cross county boundary linkages<sup>14</sup>.

Within the County the three larger urban areas of Norwich, King's Lynn and Great Yarmouth have a considerable influence providing jobs, retail, health care and a broad range of services and facilities as well as homes for a significant proportion of the county's population. These three centres are located in the east, west and centre of the County and have relatively limited functional connection with one another, notwithstanding the A47 linking all three.

### **3.2 Housing Markets**

Housing Market Areas (HMAs) are defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. In defining them, regard is given particularly to: house prices and rates of change in house prices; household migration and search patterns; and contextual data (for example travel to work area boundaries, retail and school catchment areas). They tend to represent *"...the geographical area in*

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<sup>14</sup> The linkages between Great Yarmouth and Lowestoft; the settlements in the Waveney Valley; and between King's Lynn and the Fens and Cambridge being particularly important.



*which a substantial majority of the employed population both live and work and where those moving house without changing employment choose to stay”<sup>15</sup>. All areas need to be identified as being within a housing market although housing market areas can overlap. Norfolk HMAs can be seen in Figure 4.*

Prior to the introduction of a new housing methodology in the revised National Planning Policy Framework in July 2018, the Norfolk Districts and the Broads Authority had produced Strategic Housing Market Assessments (SHMAs) which covered the entire County<sup>16</sup>. Within the Central Norfolk SHMA area (comprising of Broadland District Council, Norwich City Council and South Norfolk Council) a case can also be made for the identification of a core area based around Norwich and its immediate environs including parts of both South Norfolk and Broadland District Councils. Outputs from the Central Norfolk SHMA include separate conclusions in relation to this core area.

The boundaries of Housing Market Areas will rarely correspond with the administrative boundaries of Local Authorities (Fig.3). In Norfolk there are three distinct HMAs centred on Norwich, King’s Lynn, Yarmouth and their surrounding hinterlands. However there are some areas of the County which are distant from any of these centres; functional links are less apparent, and the case for inclusion within one HMA rather than another is less compelling. To ensure comprehensive coverage the Norfolk Authorities have agreed that the boundaries of the Housing Market Areas should be co-terminus and because housing targets will be set for each Planning Authority area the boundaries of HMAs should be ‘snapped to’ Authority boundaries.

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<sup>15</sup> Local Housing Systems Analysis: Best Practice Guide. Edinburgh: Scottish Homes

<sup>16</sup> See [Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma\\_-\\_june\\_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)  
[KLWN SHMA - https://www.west-norfolk.gov.uk/download/downloads/id/1736/shma\\_document.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/1736/shma_document.pdf)  
[Great Yarmouth SHMA - https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241](https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241)



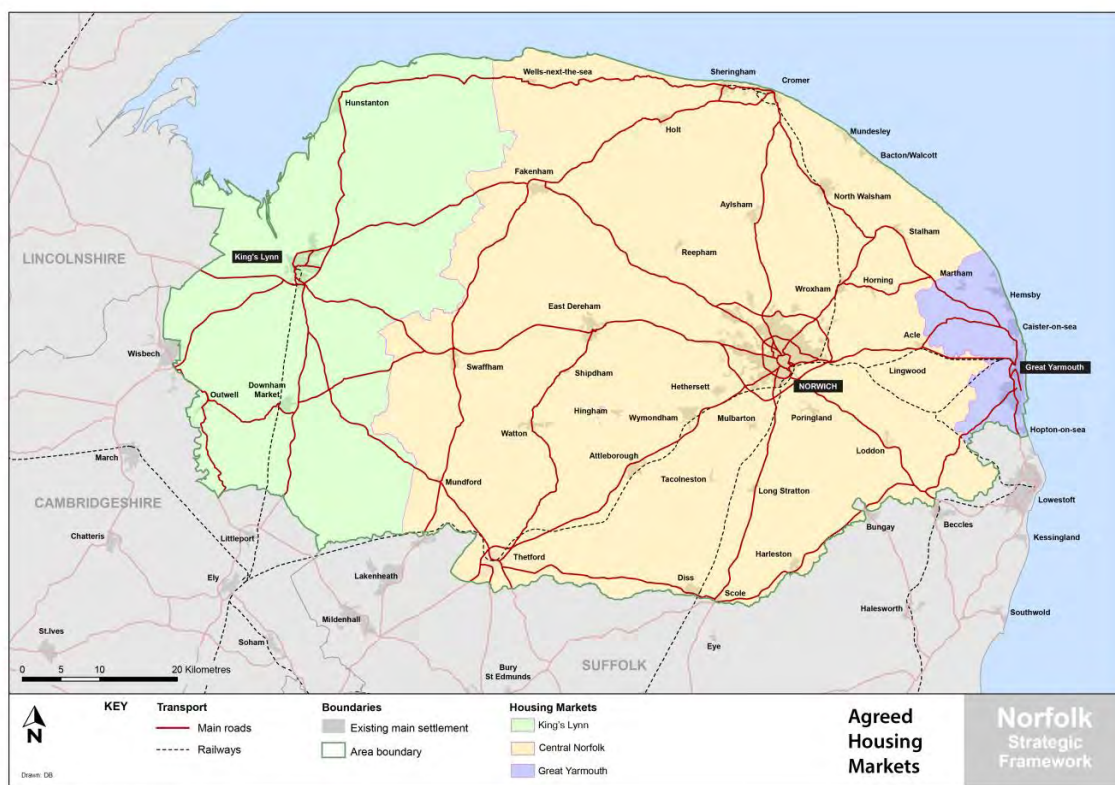


Figure 4: Map of Norfolk Agreed Housing Market Areas. 2021

#### Agreement 4 –To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

The housing needs of the relevant parts of the Broads Authority Area are included within the SHMAs for Central Norfolk, Great Yarmouth and East Suffolk. The level of need within the Broads Authority area is specified within the Central Norfolk SHMA<sup>17</sup>. The new Government methodology cannot be used to calculate the housing requirements within the Broads area, therefore there remains a requirement for the Broads Authority to calculate a separate housing need when it reviews its local plan.

By virtue of the methodological requirements of the definition HMAs, the Central Norfolk Housing Market is very large and includes settlements some considerable distance apart which have little or no functional connection. In response to this the Central Norfolk Strategic Housing Market Assessment<sup>18</sup> defines a core housing market area identifying the settlements with the strongest

<sup>17</sup> See [pages 132-134 of the Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma\\_-\\_june\\_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)

<sup>18</sup> See [pages 35-36 of the Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma\\_-\\_june\\_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)



connections to the Norwich Urban Area. This supports the decision to prepare separate Local Plans for North Norfolk and Breckland District Councils (see below).

Following the introduction of a New Housing Methodology in the Revised National Planning Policy Framework in July 2018, it is clear that government still expects local planning authorities to plan for the right mix of home types and tenures to reflect local needs and the evidence base for such planning is only currently available from the SHMAs and is not available from the new proposed standard methodology.

To help understand for the right mix of home types and tenures King's Lynn and West Norfolk have commissioned a Housing Needs Assessment in 2020<sup>19</sup>, North Norfolk has commissioned a SHMA update in 2019<sup>20</sup> and the districts in the rest of the county plan to complete similar exercise in the near future.

### 3.3 Strategic Functional Economic Market Areas

Government guidance recognises that since patterns of economic activity vary from place to place, there is no standard approach to defining a functional economic market area. However in recognising these areas it is possible to define them by taking account of factors including:

- extent of any Local Enterprise Partnership within the area;
- travel to work areas;
- housing market area;
- flow of goods, services and information within the local economy;
- service market for consumers;
- administrative area;
- catchment areas of facilities providing cultural and social well-being; and
- transport networks.

Boundaries of Travel to Work Areas (TTWAs) are illustrated over the page in Figure 5. Information on retail matters are captured within the existing evidence base supporting Local Plans<sup>21</sup>. Both these sources suggest that whilst Norwich is a major Regional Centre and draws trade from an extensive catchment across Norfolk and the wider region, both King's Lynn and Great Yarmouth retain a sufficient degree of self-containment to be considered in different functional economic market areas for most purposes.

It should also be noted that there are some very strong and significant cross boundary functional economic relationships. Great Yarmouth has particularly strong links with Lowestoft to the South. Within the Waveney Valley there are strong relationships between settlements on both sides of the County boundary. In the West of the County, King's Lynn in particular has functional economic

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<sup>19</sup> See [West Norfolk Housing Needs Assessment - https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020\\_housing\\_needs\\_assessment.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf)

<sup>20</sup> See [North Norfolk Housing Needs Assessment - https://www.north-norfolk.gov.uk/media/5528/shma-local-housing-needs-assessment-2019.pdf](https://www.north-norfolk.gov.uk/media/5528/shma-local-housing-needs-assessment-2019.pdf)

<sup>21</sup> See [in particular the Employment, Town Centre and Retail Study for the greater Norwich Local Plan - https://gnlp.oc2.uk/document/14/4552#d4552](https://gnlp.oc2.uk/document/14/4552#d4552)



linkages to the Lincolnshire and Cambridgeshire Fens. Settlements such as King's Lynn, Downham Market and Thetford also benefit to some extent by good access to the Cambridge economy.

The position within the Central Norfolk area is again more complicated as for certain economic functions (such as higher order retail and cultural activities) the catchment area extends over the whole of Central Norfolk areas; there are far weaker connections in other areas of economic activity. In outer parts of the Central Norfolk area there is little functional connection for convenience shopping and the proportion of working residents who work in the Norwich urban area is very low<sup>22</sup>. Both Thetford and Mildenhall and Cromer and Sheringham are still regarded as being distinct Travel to Work Areas. These are illustrated below.

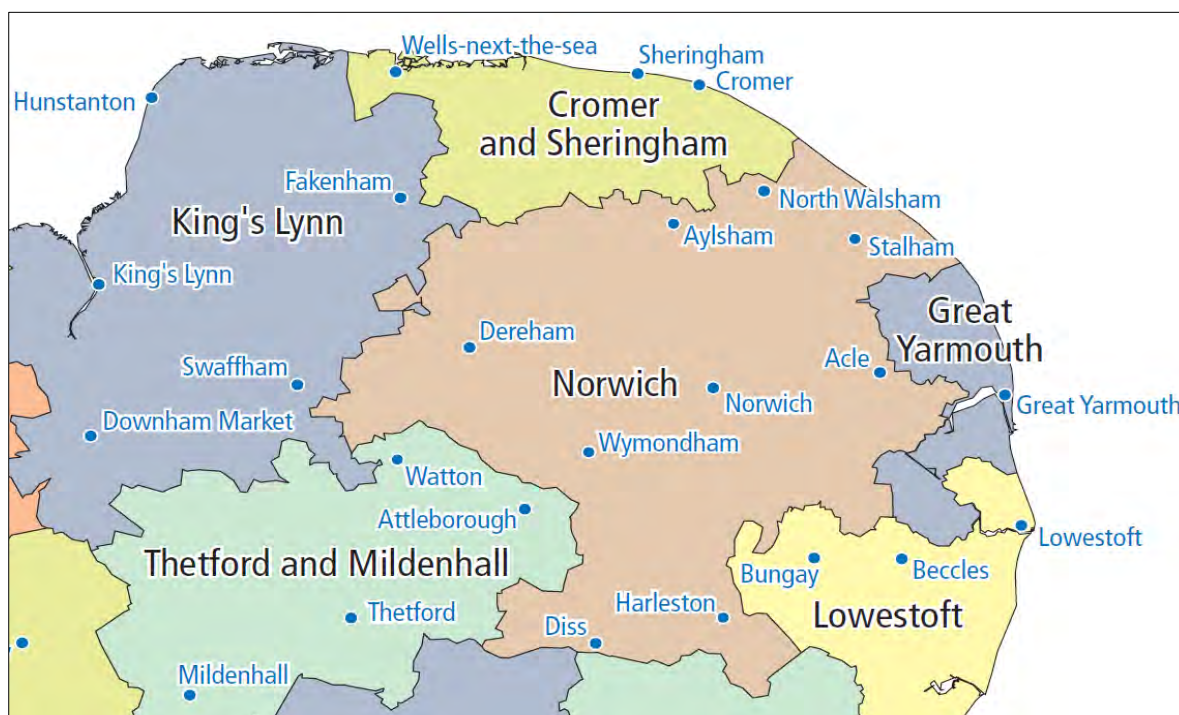


Figure 5: Norfolk's 2011 travel to work areas (TTWAs). Source: ONS 2015

The information available, including particularly the TTWAs and the higher retail analysis, suggests that the boundaries of strategic functional market areas are likely to be similar to the Housing Market Areas described above albeit, for many purposes significant sub-areas within these strategic areas will exist for a number of economic functions, especially within the Central Norfolk area.

<sup>22</sup> The Central Norfolk SHMA identified the following settlements within the area of the 5 Central Norfolk Districts as having less than 10% of their resident workforce working in Norwich: Diss, Harleston, Sheringham, Swaffham, Thetford, Watton and Wells.



### 3.4 Implications of Changing Infrastructure on Market Areas

Norfolk has benefitted from a number of significant improvements to its transport infrastructure. It is arguable that these, and others expected to be built over the next few years will have some effect on the functionality of the housing and economic markets. For example the dualling of the A11 (Fiveways to Thetford) was completed and opened in December 2014, significantly improving the road connectivity between much of the County, Cambridge, the wider South East and the Midlands. The A47/A143 link road, which opened in December 2015, now better connects Great Yarmouth's Enterprise Zone at Beacon Park to further growth areas. The Broadland Northway which completed in Spring 2018 is a key part of the Norwich Area Transportation Strategy which also includes considerable investment in a range of other improvements across Norwich<sup>23</sup>. The A17 is an important part of the road network, serving longer-distance trips, and has been included as part of the Major Road Network, a category of the road network comprising the country's busiest and most economically important A class roads in local-authority control.

The Highways (England) Roads Investment Strategy contains a number of improvement schemes for the A47 as part of the government's trunk road programme to be delivered by 2025:

- A47 Vauxhall and Gapton Roundabouts, Great Yarmouth
- A47 Blofield to Burlingham Dualling
- A47 Easton to Tuddenham Dualling
- A47/A11 Thickthorn junction

Additionally further improvement to the strategic road network of the County will be delivered by the Long Stratton bypass which is expected to be underway by 2022.

In summer 2016 the Department for Transport confirmed Abellio as the operator of the new East Anglian rail franchise, which commenced in October 2016. The nine year franchise will deliver a variety of improvements (some of which have already been delivered) including the following that are of particular significance for Norfolk:

- Replacement of the entire fleet of trains ;
- More services and faster journeys across the network, including two 'Norwich in 90' trains each way per day;
- Norwich to Cambridge services extended to Stansted Airport every hour;
- Faster services between Cambridge and London;
- Work with Network Rail to implement specific schemes to drive up performance and reliability throughout the franchise;
- Increase in seats into London in the morning peak period, and an increase of more than 1,000 services per week on the franchise network; and
- Various other improvements including improvements to WiFi, stations and ticketing systems.

A priority is the improvement of the Cambridge Norwich services including half hourly frequency.

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<sup>23</sup> See [Norwich Area Transportation Strategy - www.greaternorwichgrowth.org.uk/dmsdocument/554](http://www.greaternorwichgrowth.org.uk/dmsdocument/554) for further information



Whilst the recently delivered and announced infrastructure enhancements are welcomed and cumulatively will assist the County in reaching its economic potential it is not considered likely they will result in any significant change to the functional geography of the County in the immediate future with regard to either housing or economic markets. East/West communications across the County will remain relatively slow and lack reliability, therefore it is likely that both King's Lynn and Great Yarmouth will retain similar levels of self-containment in housing and economic matters as present. The functional geography of the County will remain broadly as it is at least for the period of the preparation of the next round of Local Plans.

In the revised NPPF the government introduced the requirement to produce a Statement of Common Ground (SCG) over the housing market area or other agreed geographical area where justified and appropriate.

In light of this requirement and the above analysis of our functional economic geography it is the view of the Norfolk Local Planning Authorities that there is a strong case to produce a single statement of common ground across Norfolk rather than seeking to produce three separate ones based on one large and two small Housing Market Areas. The reasons for this are:

- The recognised desire of the government not to disrupt existing joint working arrangements where these are effective;
- The high overall rate of self-containment of the Norfolk economy;
- The somewhat weak functional relationship between the outer areas of the Central Norfolk Housing Market Area and its core and the similarity of the strategic issues faced by these outer areas with the adjoining coastal and rural areas of Kings Lynn and West Norfolk and Great Yarmouth Boroughs; and
- The way in which the Broads Authority area overlaps both the Great Yarmouth and Central Norwich Housing Market Areas and five of the District planning authority areas which are signatories to this Framework.

Furthermore the shared understanding of economic geography has led to a number of agreements being reached about appropriate Local Planning areas for Norfolk.

The relative self-containment of both King's Lynn and Great Yarmouth suggests that in practical terms there may be problems in seeking to meet growth pressures evident in King's Lynn and Great Yarmouth within the central Norfolk area and vice versa. In the light of this the following agreement has been reached.

**Agreement 5 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.**

With regard to Central Norfolk, the evidence does suggest that there may be some possibility for some of the growth pressures evident within the five Districts of Central Norfolk to be met within the different administrative areas of Central Norfolk. These five District authorities (Breckland, Broadland, North Norfolk, Norwich City and South Norfolk, along with the Broads Authority that partly overlaps 4 of their administrative areas) already co-operate closely, have a shared SHMA and are working on other joint studies. However, as noted above the Central Norfolk Housing Market Area is broad and contains places that have little relationship within one another and only a comparatively weak relationship with Norwich at the centre of the area. In the light of this the Local Authorities have reached agreement that whilst it will be necessary to closely co-operate on strategic planning matters and shared evidence it is only appropriate to seek to plan jointly over the area closer to Norwich with much stronger functional connectivity. The possible advantages of



producing a single Local Plan covering all of Central Norfolk are considered to be outweighed by the delays this would cause to plan preparation and the difficulty of getting meaningful engagement over such a large area.

**Agreement 6 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.**

The issue of whether it is appropriate to define any sub market areas or not will be a matter for those Plans. This approach does not preclude the possible redistribution of growth across the Central Norfolk area should this be supported by evidence and agreed by the relevant planning authorities.

Furthermore, the Broads Authority Area overlaps functional housing and travel to work areas of Central Norfolk, Great Yarmouth and Lowestoft. The area clearly has a unique environment and a very distinct set of planning challenges which suggest that joint Local Planning would not be the best approach.

**Agreement 7 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.**

For further information on the current Local Plans in the County and the timetable for review please see the Norfolk Compendium<sup>24</sup>.

### **3.5 Other Joint Initiatives and Neighbouring Strategic Partnerships**

Given the high degree of self-containment in relation to the housing market and travel to work areas the framework relates principally to the county of Norfolk although where appropriate cross boundary initiatives are in place. For example planners from all of the Norfolk and Suffolk coastal local planning authorities, including the Broads Authority have also held a series of meetings over the latter part of 2017/early 2018 to share knowledge and experience and identify common interests around the coastal planning process. This has led to the creation of a separate 'Coastal' Statement of Common ground being developed<sup>25</sup> and work is underway to produce a coastal adaption Supplementary Planning Document. Other joint working arrangements include a Statement of common ground between Great Yarmouth and East Suffolk and the Cambridge Norwich Tech corridor, further details of cross boundary initiatives are in appendix 2.

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<sup>24</sup> See [Norfolk Compendium of Local Plans on https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use-policies](https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use-policies)

<sup>25</sup> See [Statement of common ground coastal zone planning report - https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/strategic-member-forum/nspmf-statement-of-common-ground-coastal-zone-planning-report-180712.pdf](https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/strategic-member-forum/nspmf-statement-of-common-ground-coastal-zone-planning-report-180712.pdf)



Norfolk is bounded by Suffolk to the south and Cambridgeshire and Lincolnshire to the West. Strategic partnerships are being developed in these neighbouring areas in response to national objectives for additional homes, jobs and enhanced infrastructure.

Following the formation of the Combined Authority (CA) for Cambridgeshire and Peterborough, the CA produced the Cambridgeshire and Peterborough Strategic Spatial Framework<sup>26</sup> in March 2018 which brings together the current growth ambitions of the area, and how the Combined Authority can support local jobs and housing growth ambitions. The Combined Authority are engaging with its partners and other stakeholders to continue to develop the second half of the Strategic Spatial Framework.

In Suffolk, the Suffolk's Inclusive Growth Framework<sup>27</sup> has been refreshed and relaunched by the Suffolk Growth Partnership in November 2020. The Framework brings together the shared growth work that is being taken forward across Suffolk into a single, cohesive programme.

The Framework:

- Presents the starting point and ambitions to allow local authorities to engage with communities, partners and Government with a clear and consistent message
- Sets out a single, concise summary of the work being taken forward to plan, coordinate and deliver growth across Suffolk
- Enables connections between programmes of work across the public sector, thereby minimising duplication and ensuring greater benefit is delivered through our investments

To the west of Norfolk the South East Lincolnshire Local Plan<sup>28</sup> was adopted in March 2019 by the Joint Strategic Planning Committee. The Committee is a partnership of Boston Borough, South Holland District and Lincolnshire County Councils who are working together to plan the future of South Holland District and Boston Borough.

Across the wider region Norfolk is represented at the East of England Local Government Association and on the East of England Strategic Spatial Planning Officers' Liaison Group (SSPOLG) The role of the latter is to coordinate technical and policy work relevant to councils in the East of England on strategic economic, planning and infrastructure challenges, with a particular focus on engagement with London and the Wider South East.

Norfolk Authorities will continue to work with authorities in the region through their strategic partnerships and national initiatives to ensure a complementary, integrated approach to growth and to optimise investment opportunities to achieve mutually beneficial outcomes.

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<sup>26</sup> See [Cambridgeshire and Peterborough Strategic Spatial Framework - https://cambridgeshirepeterborough-ca.gov.uk/assets/Combined-Authority/NSSF-Phase-1-final.pdf](https://cambridgeshirepeterborough-ca.gov.uk/assets/Combined-Authority/NSSF-Phase-1-final.pdf)

<sup>27</sup> See [Suffolk's Inclusive Growth Framework - https://27ea8bdd-fa24-451b-baf1-35bcfe30437b.filesusr.com/ugd/43f74e\\_988022cc644f4ac79d4bf0743468fa32.pdf](https://27ea8bdd-fa24-451b-baf1-35bcfe30437b.filesusr.com/ugd/43f74e_988022cc644f4ac79d4bf0743468fa32.pdf)

<sup>28</sup> See [South East Lincolnshire Local Plan - http://www.southeastlincslocalplan.org/adopted-plan/](http://www.southeastlincslocalplan.org/adopted-plan/)



## Section 4 – Projections of growth

As a baseline for planning activity published projections for the County must be considered, including projections regarding population, households and employment. These are summarised below. However, it should be recognised that these are statistical projections and tend to be very heavily based on the extrapolation of past trends. In forward planning it is essential that other factors are given due weight. This is done in subsequent sections of this document and these projections are only produced for information.

### 4.1 Population Projections

The most recent set of national population projections were published by the Office for National Statistics (ONS) in March of 2020<sup>29</sup>. These show an increase in the rate of overall population growth from the 2016 ONS figures, Table 1 shows a growth in population levels of 11% over the 18 year period from 2018-2036. Districts are projected to see a significant variation in levels of population growth of between 4% in King's Lynn and West Norfolk to 23% in South Norfolk.

Table 1: Current and projected population numbers for Norfolk Districts. Source: ONS, 2020

District	2018 (000's)	2036 (000's)	Population growth 2018-2036 (%)
Breckland	139.3	158.6	13
Broadland	129.5	145.8	13
Great Yarmouth	99.4	104.7	5
King's Lynn And West Norfolk	151.8	157.7	4
North Norfolk	104.6	114.9	10
Norwich	141.1	150.3	7
South Norfolk	138	169.2	23
Norfolk	903.7	1001.2	11

It should be noted that these projections do not take into account existing planned growth such as existing commitments in the Greater Norwich Joint Core Strategy. This would suggest a somewhat different distribution of population growth between the Greater Norwich authorities.

The population projections also contain considerable information of the age profile of the population. This is potentially of considerable strategic significance for Norfolk which will have major implications for Local Authority services and will need to be considered in Local Plans. The projected age profiles are set out in the Table 2 and 3 over the page.

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<sup>29</sup>Available at [ONS population projections - https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2](https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2)



Table 2: Existing population numbers (000s) and % by age quartiles (2018) and projected population numbers and % by age quartiles (2036) of Norfolk Districts. *Source: ONS*

District	2018				2036			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	139.3	29.5 (21.2)	75.3 (54.1)	33.5 (24)	158.6	30.6 (19.3)	78.6 (49.6)	49.4 (31.1)
Broadland	129.5	26.4 (20.4)	69.9 (54)	33.2 (25.6)	145.8	27.8 (19.1)	73.4 (50.3)	44.6 (30.6)
Great Yarmouth	99.4	22 (22)	53.4 (53.7)	24 (24.1)	104.7	20.4 (19.5)	51.9 (49.6)	32.4 (30.9)
King's Lynn And West Norfolk	151.8	32.2 (21.2)	80.4 (53)	39.1 (25.8)	157.7	30.4 (19.3)	76.3 (48.4)	51 (32.3)
North Norfolk	104.6	18.1 (17.3)	52.2 (49.9)	34.3 (32.8)	114.9	17.2 (15)	51.7 (45)	45.9 (39.9)
Norwich	141.1	31.7 (22.5)	88.5 (62.7)	21 (14.9)	150.3	30.8 (20.5)	92.7 (61.7)	26.9 (17.9)
South Norfolk	138	30.6 (22.2)	74.3 (53.8)	33.1 (24)	169.2	35 (20.7)	86.4 (51.1)	47.8 (28.3)
Norfolk	903.7	190.5 (21.1)	494 (54.7)	219.3 (24.3)	1001.2	192.2 (19.2)	4511.1 (51)	298 (29.8)

Table 3: Change in 000s between 2018 and 2036. Difference between 'All People' for each district between 2016 and 2036 in %. *Source: ONS*

District	Difference between 2018 and 2036			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	19.3	11.1 (-1.9)	3.3 (-4.5)	14.9 (7.1)
Broadland	16.3	1.4 (-1.3)	3.6 (-3.7)	11.4 (5)
Great Yarmouth	5.4	-1.6 (-0.5)	-1.5 (-4.1)	8.4 (6.8)
King's Lynn And West Norfolk	5.9	-1.8 (-1.9)	-4 (-4.6)	11.8 (6.5)
North Norfolk	10.3	-0.8 (-2.3)	-0.5 (-4.9)	11.6 (7.1)
Norwich	9.2	-0.9 (-2)	4.2 (-1)	5.9 (3)
South Norfolk	31.2	4.4 (-1.5)	12.1 (-2.7)	14.7 (4.3)
Norfolk	97.5	1.7 (-1.9)	17.1 (-3.7)	78.2 (5.5)



These tables show that whilst the overall population of the County is projected to grow steadily at a relatively modest rate, the change in the age profile is more significant with over 80% of the total increase between 2018 and 2036 being accounted for by growth in the over 65s<sup>30</sup>. Between the ages of 20 and 64 population growth is projected to be slow, with only a 3% growth rate over the 18 year period, whilst the numbers of 0-19 years olds are projected to grow very slowly by just 0.9%.

These numbers do vary somewhat between individual districts (with Norwich being notably less affected by an ageing population) but the growth in the elderly population is projected to affect most parts of the County and will create significant issues given current models for funding social care and education provision. These issues are not considered further in the framework but the issues relating to housing are considered further in the housing section.

The 2019 Health profile for England<sup>31</sup> suggests:

- Improvements in life expectancy in England are uncertain with provisional data showing that life expectancy at has seen no improvement from 2017 figures.
- The number of years spent in poor health is increasing. This will impact the need for particular housing, transport and service delivery solutions

Deprivation and inequality continue to be key and enduring factors in poor health outcomes and so need addressing. Consequently access to housing and employment and the impact of spatial and economic planning on these factors needs consideration.

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<sup>30</sup> Total growth in population age 65 plus is 78,200

<sup>31</sup> <https://publichealthengland.exposure.co/health-profile-for-england-2019>



## 4.2 Household Projections

The most recent set of household projections were published in June 2020<sup>32</sup>. For the country these 2018 projections are broadly in line with the 2016 projections, however for Norfolk these show a significant increase in households, by approximately 9000 by 2036, over the 2016 household projections. Similar patterns of growth are shown as for population but it should be noted that these projections do not take into account growth planned in existing Local Plans which may influence the scale and distribution of the growth in households. The new household projections also show greater growth in the more rural districts compared to previous versions of the projections.

**Table 4: ONS 2018 household projections. Source: ONS**

District	2011	2018	2026	2036	Household growth 2018-2036 (%)
<b>Breckland</b>	54,522	58,612	63,815	69,497	19
<b>Broadland</b>	53,343	55,676	59,997	64,593	16
<b>Great Yarmouth</b>	41,988	43,350	45,460	48,106	11
<b>King's Lynn and West Norfolk</b>	62,928	64,461	66,522	69,539	8
<b>North Norfolk</b>	46,033	48,448	51,374	55,390	14
<b>Norwich</b>	59,587	63,012	64,778	68,088	8
<b>South Norfolk</b>	52,825	60,172	67,140	75,221	25
<b>Norfolk</b>	<b>371,225</b>	<b>391,737</b>	<b>419,086</b>	<b>450,434</b>	<b>15</b>

## 4.3 Employment Projections

Across the East of England Local Authorities use the East of England Forecasting Model (EEFM) to better understand the development needs of their area. The model provides a set of baseline forecasts designed to facilitate the setting of consistent housing and jobs targets and can also provide a means of generating alternative scenarios. It is prepared by the independent forecasting house Cambridge Economics and further information about the model and details of runs published are available online<sup>33</sup>.

Table 5 sets out the headline results for Norfolk Districts produced in the 2017 run of the model. As with any forecast model, these results need to be treated with a degree of caution. They are “policy neutral” and assume that policy context in the future remains broadly as it has in the past. They cannot reflect the impact of any recent or future interventions that may be made through infrastructure investment, Economic Strategies or Local Plans, and the model has yet to be run to take account of the impacts of both the Coronavirus and the UK leaving the European Union. In addition, the reliability of a number of the underlying datasets decreases at smaller scales, and

<sup>32</sup> See [ONS household projections - https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections](https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections)

<sup>33</sup> See [East of England Forecast Model website - http://cambridgeshireinsight.org.uk/EEFM](http://cambridgeshireinsight.org.uk/EEFM)



economic activity is not limited by council boundaries, so individual sector and District forecasts should be treated as being broadly indicative.

Overall the model shows that without additional intervention total job levels in the Norfolk economy are projected to grow at relatively modest rates over the next 20 years with most of the growth projected taking place within Greater Norwich. If the aims of the City Deal are added to the model's forecasts, it projects that over 92% of all the net growth in Norfolk will take place in Greater Norwich.

**Table 5: Total employment by district. Source: EEFM 2017 and Central Norfolk SHMA**

Districts	Total employment (000's)				2016-2036 growth (000's)
	2011	2016	2026	2036	
<b>Breckland</b>	49.8	57.5	58.2	59.8	2.3
<b>Broadland</b>	53.7	58.7	61.1	62.6	3.9
<b>Great Yarmouth</b>	41.9	43.9	45.9	47.6	3.7
<b>King's Lynn &amp; West Norfolk</b>	62.6	68.9	71	72.3	3.4
<b>North Norfolk</b>	39.5	42.4	43.3	44.3	1.9
<b>Norwich</b>	89.5	102	108.4	113.3	11.3
<b>South Norfolk</b>	56.3	63.3	68.9	74.7	11.4
<b>Greater Norwich*</b>	199.4	223.9	250.3**	262.3**	38.4
<b>Norfolk</b>	393.3	436.7	468.7**	486.4**	49.6

\*Broadland, Norwich & South Norfolk

\*\*City Deal additional 11,800 jobs added but not broken down between GN Districts

Note: The Broads does not have its own jobs figures but any jobs delivered contribute to district target.



## Section 5 – The Economy

### Strategic Economic Objectives

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership Economic Strategy, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements and across county boundaries to strengthen inward investment;
- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure;
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities;
- recognising the role of our city centre and the need to re-examine and revitalise the role of town centres as a focus for investment and enhancing the quality of life for residents;
- recognising that the long term conservation, investment in and enhancement of Norfolk's natural environment and heritage is a key element of the county's competitiveness and contributor to the Norfolk economy;
- ensuring a healthy workforce through well planned sustainable communities where people can walk and cycle to work or use public transport or work effectively from home;
- recognise that housing underpins economic growth;
- Maximising the opportunity a clean/green economic recovery presents for the region and the new jobs which will be required to achieve the Governments net zero target



## 5.1 Strategic Principles of Economic Success

It is clear that Local Authorities will need to continue to work collaboratively with one another, the LEP and businesses in order to deliver the step change in economic performance that is necessary to deliver the shared objectives. Among the measures that are thought likely to be necessary at this stage are:

### Supporting future economic growth

- supporting the development of businesses in identified priority sectors, including building on and making links with established and emerging clusters, and the provision of well serviced land and vacant premises;
- facilitating physical regeneration and enhancement projects in areas of deprivation, involving the local community in the process;
- encouraging international trade and supporting increased inward investment
- recognising the contribution of Norfolk's market towns

### Education and skills

- supporting the creation, expansion and enhancement of education establishments, including further education, technical institutes and universities to develop the right skills base in the workforce; and
- enhancing the quality of the natural and built environment to ensure that the area remains attractive for its quality of life, and as a location for business.
- supporting the role of apprenticeships for retraining and up skilling the workforce including the expansion of the syllabus offered to meet the needs of locally based businesses
- supporting labour market resilience through initiatives including support for residents with health related problems to get back into work

New Anglia has been chosen as 1 of 2 pilots across the greater south east energy hub area to work with the energy systems catapult to develop the institutional and physical infrastructure to support the rapid deployment of high-quality training programmes needed to deliver cutting edge property decarbonisation schemes. This proposal seeks to address the gaps and shortcomings through a global and whole house skills and training approach that integrates technologies and delivers good outcomes for customers, rather than the piecemeal installation of measures.

### Connectivity

- enhancing the provision of infrastructure to enable digital connectivity that will facilitate economic growth.
- supporting employment allocations that minimise travel distance and maximise the use of sustainable transport modes;
- ensuring that investment in strategic transport infrastructure demonstrably supports economic growth, and also ensuring that economic strategies and Local Plans support the case for investment in that infrastructure; The new 'Norfolk & Suffolk Innovation Network' Funding will create a Long-Range Wide Area Network (LoRaWAN), for sending and receiving low power signals from digital sensors across the region. This will enable business, public sector, educational organisations and individuals to explore, trial and implement Internet of Things (IoT) technology.



## 5.2 Context

The recent growth in Norfolk's economy is driven by certain key sectors, mostly concentrated in specific geographic areas, where there are particular strengths and expertise, for example energy, advanced engineering, tech/digital, food and life sciences. Norfolk's overall employment rates have generally remained above national levels over the past 10 years (currently 77.7%, compared to the national level of 75.6%) and unemployment rates are generally below the national level and lower than they were 10 years ago<sup>34</sup>.

While this Strategic Framework addresses development matters (broadly speaking, building and changes in the use of land), it is recognised that to be fully effective this needs to be complementary to other programmes and measures at the district, county, regional and national levels. In the light of the factors mentioned above, endeavours to promote 'inclusive growth' are especially relevant such as developing skills, community aspiration and capacity; recognising and nurturing the contributions of voluntary and community sectors; the quality of job opportunities, etc.

Whilst many districts have their own economic development strategies, the importance of working collaboratively across district boundaries is recognised. This Norfolk Strategic Planning Framework provides one of the foundations for cooperation as does the Norfolk and Suffolk Strategic Economic Strategy (NSES), published in 2017.

The Government published its Industrial Strategy White Paper, 'Building a Britain fit for the future' in November 2017<sup>4</sup>. The overarching aim and ambition of the Industrial Strategy is to provide a long term framework to build on our areas of competitive advantage, to close the gap between our best and worst performing areas, and make the UK one of the most competitive places in the world to start or grow a business. The strategy identified 5 foundations of productivity and 4 grand challenges to put the UK at the forefront of the industries of the future.

In response, the New Anglia LEP, in consultation with stakeholders, produced the Norfolk and Suffolk Local Industrial Strategy (LIS) which was submitted to Government in Autumn 2019.

All of the Districts have formally endorsed working to deliver the NSES and there is a good record of collaboration on specific economic development projects. This Framework provides the opportunity to lay the foundation for developing a Norfolk Economic strategy which builds upon both the NSES and Districts own economic development strategies.

The Norfolk and Suffolk LIS and the Economic Strategy are designed to work in tandem and the targets set out in the NSES are still valid. Some of the key targets are summarised in Table 7.

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<sup>34</sup> ONS Annual Population survey, (July 2017-June 2018)



Table 6: Summary of Key Economic Strategy targets (New Anglia Area)

Economic Strategy Headline	Target (to 2036)
<b>Jobs</b>	88,000 more jobs
<b>Businesses</b>	30,000 new businesses
<b>Housing</b>	140,000 new houses
<b>GVA</b>	£39 per Hour

It is expected that measures to assist in the delivery of these objectives will be brought forward as part of the Implementation of Delivery and Investment Plans.

The Norfolk Local Authorities are committed to strengthened collaboration and focus on new initiatives and interventions to help nurture economic growth in higher value, knowledge based sectors across Norfolk. These include multi-site Enterprise Zones led by the New Anglia LEP, the Cambridge-Norwich Tech Corridor, innovation centres at King's Lynn and Hethel, and energy related Enterprise Zone sites across Great Yarmouth and East Suffolk.

### 5.2.1 Coronavirus Impacts

The impact of the Covid-19 pandemic has been profound with tens of thousands of lives lost, lockdown restrictions which have affected daily lives, and significant damage to the local and national economy. In response to the pandemic the New Anglia LEP, working with partners, has produced the Covid 19 Economic Recovery Restart Plan.

This restart plan sets out the actions and interventions that are being taken by a wide range of partners, including New Anglia LEP, local authorities, business, industry councils and sector groups, VCSE organisations, colleges and universities. It demonstrates the strong local appetite and energy for getting the local economy going again and helping those who have been hit hardest.

The Restart Plan contains an unprecedented package of measures delivered by partners locally and nationally to get businesses up and trading again, restore business, consumer and community confidence, as well as provide support to individuals made redundant and looking for work.

The Key measures include:

- Responding to redundancies to support individuals being made redundant and help businesses looking for workers.
- Advice and support for businesses - every business has access to the finance and support they need.
- Youth pledge to support young people to get into high quality education, employment, training, or an apprenticeship.
- Transforming skills to ensure everyone has access to opportunities to upskill and reskill
- Mental health and wellbeing programme that provides employers and employees with the mental health and wellbeing support they need.
- Reimagining high streets - support in developing a range of measures to help high street businesses reopen and operate safely.
- Visitor economy – launch a proactive campaign to promote the area as a destination to live and work



- Digitisation – launch a major campaign to support businesses to build their online presence and to improve productivity, including flexible working practices for their employees, through better use of technology.
- Supply chain – work with local companies to capitalise on opportunities to sell more goods and services locally
- Infrastructure – supporting the construction sector through continued investment in key infrastructure and make a compelling case to Government to fund priority infrastructure schemes.
- Norfolk & Suffolk Unlimited – develop a campaign to promote Norfolk and Suffolk as a place rich with investment opportunities.
- Safe and sustainable public transport – work to support and promote safe and sustainable public transport use, to continue to improve air quality and reduce congestion

This Restart Plan is the first of a two-stage economic recovery plan for the area. It will support businesses, individuals, communities, anchor institutions and further and higher education providers to start trading and living life with confidence, in an environment dominated by social distancing and economic uncertainty, as quickly and safely as possible. Both the restart and renew recovery plans will look to capitalise on the county's major strengths and new opportunities in clean energy, agri-food, information and communication technology and digital creative, alongside ensuring the foundation sectors get the support needed.

The second stage to the plan is the Renew Plan, this a longer-term plan for jobs and sustainable growth which will also serve to support the Government national recovery plan. The restart plan is also supported by the Visitor Economy Recovery plan and evidence base<sup>35</sup>.

#### **AGREEMENT 8 - Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan**

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<sup>35</sup>See [New Anglia LEP Covid 19 Economic Recovery Restart Plan - https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf](https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf)



### 5.2.2 Climate Change

In November 2020 the government set out ambitions for investment in clean energy, transport and energy efficiency, designed to support the country's 2050 net zero emissions target and to support up to 250,000 new jobs. The 10-point plan<sup>36</sup> includes commitments on offshore wind, low carbon hydrogen production, electric vehicles and nuclear. Ten Point Plan are:

1. Advancing Offshore Wind
2. Driving the Growth of Low Carbon Hydrogen
3. Delivering New and Advanced Nuclear Power
4. Accelerating the Shift to Zero Emission Vehicles
5. Green Public Transport, Cycling and Walking
6. Jet Zero and Green Ships
7. Greener Buildings
8. Investing in Carbon Capture, Usage and Storage
9. Protecting Our Natural Environment
10. Green Finance and Innovation

The Energy white paper<sup>37</sup> expands on the Ten Point Plan and sets out the steps needed to cut emissions from industry, transport and buildings.

In March 2019, the UK Government and offshore wind industry agreed a Sector Deal, securing offshore wind's position at the heart of the future UK energy mix as a large-scale, low-carbon form of electricity.

### 5.2.3 Norfolk's Key Economic Sectors

There are significant geographic clusters of existing business activity that anchor the Norfolk economy, with a number of these offering significant potential for growth. The Norfolk and Suffolk Economic Strategy identifies nine key sectors:-

- Energy
- Advanced Agriculture, Food & Drink
- Life Sciences and Biotech (including health)
- ICT, Tech and Digital Creative
- Financial Services and Insurance
- Visitor Economy – Tourism and Culture
- Transport, Freight and Logistics
- Construction and Development
- Advanced Manufacturing and Engineering

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<sup>36</sup> See [The Ten Point Plan for a Green Industrial Revolution - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/936567/10\\_POINT\\_PLAN\\_BOOKLET.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf)

<sup>37</sup> See [Energy White Paper - Powering our Net Zero Future - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/945899/201216\\_BEIS\\_EWP\\_Command\\_Paper\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf)



The new Local Industrial Strategy has further refined priority sectors as:-

- Clean Energy
- Agri-Food
- Information and Communications Technology and Digital Creative

Whilst acknowledging the other underpinning sectors listed in the NSES.

### **Clean and Renewable Energy**

Norfolk is well placed to be a global exemplar for clean, low carbon energy production, exporting services and skills globally, whilst increasing the availability of affordable sustainable energy for local communities and businesses. Norfolk has expertise in many forms of energy generation and sits at the heart of the world's largest market for offshore wind energy. Planned investment in renewable generation will make it a significant supplier of renewable energy to the UK. As well as a key role in the production of energy, Norfolk is also playing a leading role in the transition to a zero-carbon economy working with the Greater South East Energy Hub to deliver local projects at scale that benefit communities, private investors and businesses operating in the low carbon sector is a priority. Transforming the local energy system and new innovations in wider energy resource use will drive productivity gains across all businesses. Bacton Gas Terminal in North Norfolk is a major component of UK energy infrastructure, providing one third of the UK gas supply, making it an essential component in ensuring the future energy security of the UK. The Local Energy East Strategy sets out collective ambitions to 2030 underpinned by a range of activities that the Local Energy East Network and the Greater South East Energy Hub will take forward to ensure that the remains at the forefront of clean growth in the UK and grasps the opportunities ahead.

### **Life Sciences and biotech**

Norfolk's life sciences sector is home to innovative, high-tech businesses and research institutions with close links to the food, health and agriculture sectors. Norwich Research Park (NRP) - comprising UEA, John Innes Centre, Earlham Institute, Quadram Institute, The Sainsbury Laboratory and Norfolk and Norwich University Hospital - is a world-leading research base, at the forefront of global food and health research. It is Europe's largest single site hub of research, training, education, and enterprise in food and health. The £76m Quadram Institute at NRP is helping create a fundamental shift in the way we understand and address the impact of food on health

The New Anglia Local Industrial Strategy sets out a range of actions that will be taken forward to maximise the clean agri-food opportunity including:

- Invest in a Food Innovation Hub based at the Honingham Food Enterprise Zone to deliver business growth through innovation, productivity, processing, exports and supporting new start-ups.
- Develop a world-leading hub for plant and microbial research at the John Innes Centre.

### **Advanced Agriculture Food and Drink**

Home to an advanced and nationally significant farming sector, alongside globally renowned food and drink companies and a world-leading research base centred at Norwich Research Park (NRP). Building on Norfolk's historical agricultural strengths the sector is globally renowned and nationally significant.

Alongside this are a host of nationally and internationally significant food and drink companies, supported by a local supply chain of firms specialising in the manufacture of machinery and equipment to support them. This sector is an important employer in both rural and urban areas



Norfolk is home to the Honingham Food Enterprise Zone and to a world-leading research base centred at NRP, Norfolk is at the forefront of global agri-tech research, whilst innovative and export-intensive firms continue to develop commercially successful feeders, spreaders and pesticides.

Water Resources East<sup>38</sup> has been set up to work in partnership to safeguard a sustainable supply of water for the east of England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential. Water Resources East is supported by all authorities in Norfolk either through the County Council's board membership or as standard members themselves.

### **ICT, Tech and Digital Creative**

Norwich hosts a growing cluster of digital creative businesses. The New Anglia Local Industrial Strategy highlights plans to create a new digital hub in Norwich for the incubation of start-ups and accommodation of scale-up businesses in the digital and creative cluster. The University of East Anglia plays a key role in Norwich's tech community, supporting and connecting many of the active business groups. Norwich University of the Arts (NUA), with its specialism in arts, design and media, is centre of the dynamic creative community and home to the Ideas Factory incubation centre for digital creative businesses and user experience Lab.

Water Resources East<sup>38</sup> has been set up to work in partnership to safeguard a sustainable supply of water for the east of England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential. Water Resources East is supported by all authorities in Norfolk either through the County Council's board membership or as standard members themselves.

### **Visitor Economy - Tourism and Culture**

A varied and rich tourist offer, from coast and countryside to postcard market towns, underpinned by a dynamic and pioneering cultural sector boasting internationally celebrated brands. Norfolk is a successful destination, evidenced by a thriving visitor economy. The area has traditional holiday destinations including the North Norfolk Coast and Great Yarmouth, together with unique natural assets such as the Broads National Park, the Brecks, and Areas of Outstanding Natural Beauty. It also has the home of important heritage sites such as Norwich (England's most complete medieval city). Norfolk's vibrant cultural sector boasts award-winning theatres, major international festivals such as Norwich, England's first UNESCO City of Literature. The cultural and heritage sector and natural landscape plays a unique role in creating the 'sense of place' that makes the area a great place to live, work, learn, invest and do business in. The sector is an important employer and attracts significant investment from national and international funding bodies.

### **Financial services and Insurance**

Greater Norwich has been a base for financial industries for over 200 years and is one of the largest general insurance markets in Europe. Recognised as a centre for excellence for financial and professional services, Norwich is home to a significant cluster of global firms. Boasting a financially literate, highly-skilled and stable workforce, and the first National Skills Academy in the UK for financial services.

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<sup>38</sup> See [Water resources East Website - https://wre.org.uk/](https://wre.org.uk/)



### **Transport, freight and logistics**

Great Yarmouth port has a regional focus relating to the offshore energy sector. The sector is characterised by a strong logistics sector with international firms. Clustered around Norwich, there is also a sizable aviation sector, specialising in maintenance and repair, as well as servicing the offshore industry. The recently opened Aviation Academy, in collaboration with KLM Engineering, is a specialist centre of aircraft, overhaul and maintenance.

### **Construction and Development**

Norfolk has a large and diverse construction and development sector, the UK's largest urban extension in Broadland and emerging specialisation in modern methods of construction and sustainable design. Norfolk's economy and attractive location for housing has driven economic success in the construction and development sector. The Construction Industry Training Board (CITB), a partner in the national Sector Skills Council for the construction industry, is based in Bircham Newton. The area has significant levels of employment across all construction-related industries. The sector also has an emerging specialism in modern construction and sustainable design, with the Fabric First Institute at Easton & Otley College.

### **Advanced Manufacturing and engineering**

The advanced manufacturing and engineering sector in Norfolk reflects the area's diverse economic strengths. The sector links into the supply chain of specialisms such as agriculture and food production, civil aviation, transport and energy. Hethel Engineering Centre is the regional hub for innovation and technology and has the potential to expand to meet the demand for incubation space in this growing sector. Businesses are working together with UEA, through the New Anglia Advanced Manufacturing Engineering sector group, to develop a new Institute for Productivity. This will build on UEA's expertise in business education and engineering. There are several specialist advanced manufacturing and engineering companies in the area at sites including Hethel and Thetford.

Notwithstanding these clusters and our economic strengths, the challenge going forward is the Norfolk economy's high level of dependency on lower wage, lower-skill sectors such as food production, agriculture and tourism, and the related high concentrations of very deprived populations in some parts of the County and 'hidden' rural poverty elsewhere. This is reflected in productivity levels per head which are currently at 25% below the national average<sup>39</sup>. This, coupled with low levels of investment, relatively poor infrastructure and skills attainment, impacts on potential future economic growth.

The development of this framework has concentrated on; identifying strategic sites, possible further interventions and cross boundary working that will need to be taken forward to deliver the shared objectives that have been agreed.

Supporting the growth of Norwich Research Park for example, and other key Enterprise Zone sites, will help to grow knowledge jobs in key sectors and enhance the commercialisation of research. A greater focus on supporting digital entrepreneurs will also help strengthen the growing cluster of tech/digital creative enterprises in and around Norwich's city centre, and strengthening supply

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<sup>39</sup> See [East of England Forecast Model - https://cambridgeshireinsight.org.uk/eefm/](https://cambridgeshireinsight.org.uk/eefm/)



chains in the manufacturing, engineering and energy sectors will enhance business sustainability and employment growth.

#### **5.2.4 Sector impact of the Coronavirus**

The Covid 19 Economic Recovery Restart Plan will support the restart and renew of the local economy and focus activity on stabilising and renewing the foundation industries recognised in the Economic Strategy and Local Industrial Strategy, including the care and VCSE sectors. Economic activity will recover as lockdown is lifted, but the speed and degree is uncertain and will vary by sector, the impact on each sector is considered below:

**Agri-food** - Unprecedented demand at food retailers has put pressure on the food system in some areas, whereas the closure of the hospitality industry has created surplus in others.

**Clean energy** - The global pandemic has affected both the supply and demand for energy.

**ICT digital** - The lockdown has led to homeworking en masse, with people looking for new ways to work, learn, shop and socialise virtually. Home working will help support more rural areas but will require improved access to broadband and other digital connectivity (see section 9.5).

**Visitor economy** - The sector has been amongst the hardest hit, with businesses forced to stop trading just before the start of the season.

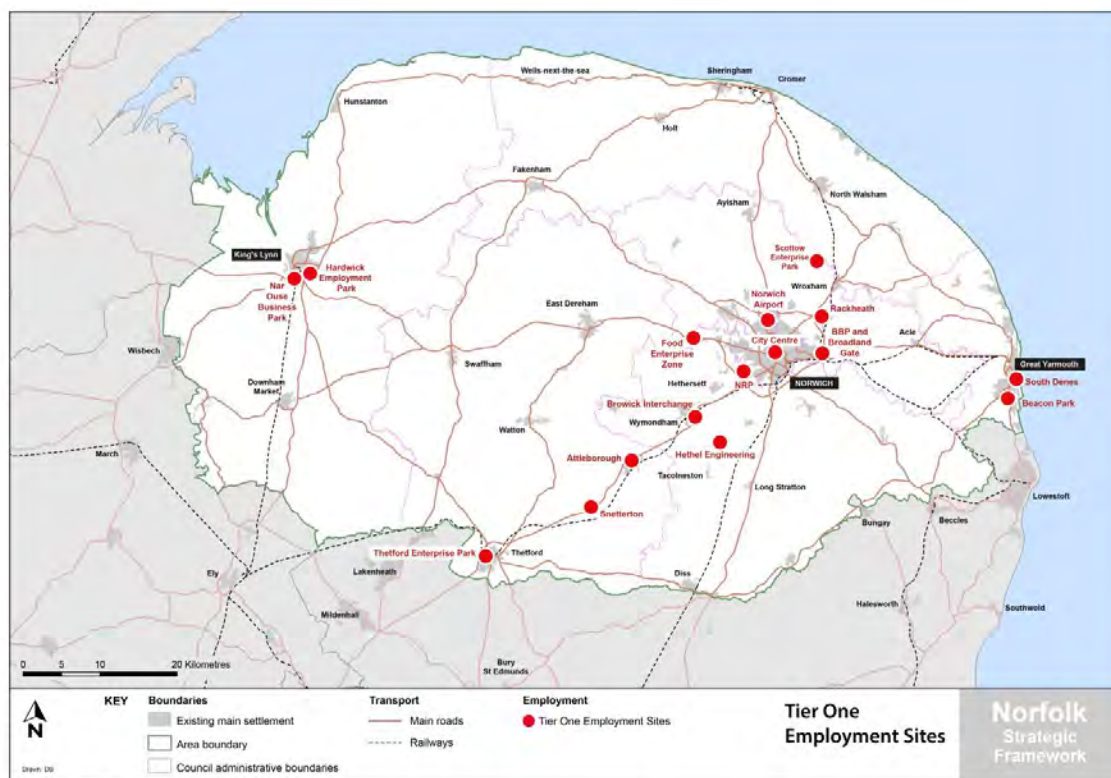
**Health and social care** - The pandemic has pushed the health and social care sector into the front line of dealing with the crisis. Nationally, care homes have seen high Covid-19 death rates in both residents and frontline staff, reinforcing the need for Personal Protective Equipment, correct training and capital Investment.

**Voluntary** - The pandemic has negatively affected resources, income and funding of third-sector organisations and impacted their ability to meet objectives in the longer term while demands continue to increase.



### 5.3 Strategic Employment Sites

Strategic employment sites have been agreed through joint activity on economic development and inward investment. They are all located in the growth locations identified in New Anglia LEP's Economic Strategy and Local Industrial Strategy and are targeted at the Norfolk and Suffolk Economic Strategy's key sectors. Therefore it is crucial to facilitate a step change in our economy and the focus of promotional activity.



Together they form a package of sites that provides a comprehensive offer for inward investment and strategic growth, a number of which have Enterprise Zone status. The number and availability of these sites gives Norfolk an economic advantage in attracting certain types of inward investment. In addition, as a result of their scale and type, these sites have additional potential through existing and planned close cross-boundary working. By their nature some of these sites form part of wider functional economic areas which span district/county boundaries, increasing potential for joint collaboration to enhance economic growth.

Agreement 8 recognises that these Tier 1 sites<sup>40</sup> should be protected from loss to alternative uses such as housing which is consistent with Paragraph 4.18 of the Housing White Paper which proposes that employment sites identified as “strategic” will not be subject to reduced protection from residential development. It is therefore proposed that the Tier 1 employment sites identified in Table 8 are formally recognised as “strategic” employment sites within Agreement 8.

<sup>40</sup> Tier 1 Employment sites are site identified by local authorities as significant in size (greater than 10 Hectares), Support key strategic sectors and support key growth locations.



**Table 7: Tier one employment sites, sector, location and size. 2021**

<b>Site</b>	<b>Supports N&amp;S Economic Strategy's Key Sector(s)</b>	<b>N&amp;S Economic Strategy's Growth Location</b>	<b>Land available (approx.)</b>
Attleborough	Advanced Manufacturing and Engineering	Tech Corridor	10 ha
Broadland Business Park area			
- plots on existing BBP			
- BBP Laurel Farm	Financial services	Greater Norwich	55ha
- St Andrews northside,	ICT & Digital Creative		
- Broadland Gate			
Browick Interchange (Wymondham)	Advanced Manufacturing & Engineering. ICT and Digital	Tech Corridor	20 ha
Food Enterprise Zone Honingham/Easton	Food, Drink & Agriculture	Greater Norwich / Tech-corridor	10 ha
Great Yarmouth Enterprise Zone and Energy Park sites:			
- Beacon Park (EZ)	Energy	Great Yarmouth and Lowestoft	13.5ha
- South Denes (EZ & EP)			25ha
Hardwick extension (King's Lynn)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10)	27 ha
Hethel Engineering Centre and Technology Park	Advanced Manufacturing & Engineering	Greater Norwich Tech Corridor	20ha
Nar Ouse Business Park (King's Lynn) (part EZ)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10 corridor)	17 ha (EZ)
Norwich City Centre	ICT and Digital Creative Financial Services Tourism and Culture	Greater Norwich	Multiple Sites
Norwich Airport			
- Aeropark			
- Southern area (around Hurricane Way)	Advanced Manufacturing & Engineering	Greater Norwich	75ha+
- Airport business park			
Norwich Research Park (part Enterprise Zone)	Life Sciences Food, Drink & Agriculture	Greater Norwich Tech Corridor	40ha (EZ 25ha)
Rackheath	Advanced Manufacturing and Engineering	Greater Norwich	25 ha
Scottow Enterprise Park	Logistics Energy	Greater Norwich/ North Norfolk	26 ha
Snetterton	Advanced Manufacturing & Engineering	Tech corridor	68ha
Thetford Enterprise Park	Advanced Manufacturing & Engineering Food, Drink & Agriculture	Tech corridor	18ha



**Agreement 9 - The above list of locations are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses.**

This list will need to be kept under review in the light of emerging Economic Strategy priorities and the progress on Local Plans.

## **5.4 Key Cross-Boundary Economic Issues and Interventions**

This section identifies the principal strategic economic matters and other matters which can only be fully addressed through development plans in (or across) more than one local planning authority area. It therefore does not include a wide range of matters which whilst they are recognised as very important, but which do not meet the specific definition of strategic development 'Duty to Cooperate' matters laid down by the Localism Act. These include the generality of

- rural economy (including agriculture);
- tourism and recreation;
- development of market towns;
- Coastal Change;

Development associated and supporting these is addressed through individual local plans and informal joint working between local planning authorities, and these issues are addressed more widely through economic and other strategies. Neither is this section intended to include every economic issue that requires cross-boundary working, but just those of an extensive or special significance from a Norfolk wide perspective.

### **5.4.1 The role of Greater Norwich**

Norwich and its immediate hinterland is the prime economic generator in the County. Its influence, and the policy measures required to make the most of this extend well beyond both the City Council's boundaries and the existing urban area.

A large part of the county depends upon the vibrancy of the city for employment, services, higher order retail, culture and leisure. It also has an economic importance as a public transport hub. The vibrancy and focus of activity in the city centre also attracts significant numbers of visitors, and helps make the wider area an appealing place to live, work, invest and locate businesses. The economy of this wide area of influence will benefit from ensuring that the city is accessible; the centre continues to thrive and is attractive to inward investment; and out of centre development complements the overall offer.

The Broadland Northway will support the delivery of planned housing and jobs to the north and north-east of Norwich. It will improve strategic access to a wide area of Broadland and North Norfolk. Realising the full range of economic opportunities will benefit from cooperation. The Airport supports the economy of the area including the off shore energy sector. The proposed Western Link will further enhance access to the Norwich Research Park, Food Enterprise Zone and Norwich Airport.

Broadland, Norwich, and South Norfolk, with Norfolk and the Broads Authority, are working through the Greater Norwich Development Partnership (GNDP) on the planning of the area.

The Five Year Infrastructure Investment Plan identifies the projects from the Greater Norwich Infrastructure Plan the delivery of which is considered to be a priority for achieving the economic growth targets, as set out in the Joint Core Strategy and the Greater Norwich City Deal. The Greater



Norwich Growth Programme identifies infrastructure schemes to be prioritised for delivery and development within each financial year, using pooled CIL funding.

The Norwich Area Transportation Strategy (NATS) identifies the transport improvements needed over the next 15+ years. The NATS Implementation Plan (agreed 2010, updated 2013) sets out a range of transport measures with their intended phasing for delivery over the short to medium term. The work is now branded as Transport for Norwich (TfN). The TfN Strategy is being reviewed and a consultation is expected later on in 2020. The Implementation plan is currently being developed through the work on Transforming Cities and a bid has been made to Government to fund a 3 year programme of delivery.

#### **5.4.2 Cambridge to Norwich Technology Corridor**

The corridor from Norwich to Cambridge, identified in Fig.7, includes a number of important existing and emerging clusters and strategic employment sites. It provides the potential for significant economic development, particularly as connectivity has improved with full dualling of the A11 between Norwich and Cambridge. The corridor also benefits from the Norwich to Cambridge railway line, direct trains between Norwich to Stansted airport and an increased number of internal and external route from Norwich Airport. These opportunities need to be supported and exploited to maximise economic benefits.

The corridor is identified as a key growth corridor in the New Anglia LEP's Economic Strategy, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan. The Cambridge Norwich Tech Corridor initiative<sup>41</sup> has been established to maximise the economic benefits of this high quality location with its world class universities, research institutes and business clusters. The partnership will both capitalise on the talent pool, emerging clusters, low cost space, infrastructure networks, in conjunction with securing new investment for the area ( e.g. SETI), to deliver innovation-led growth and investment.

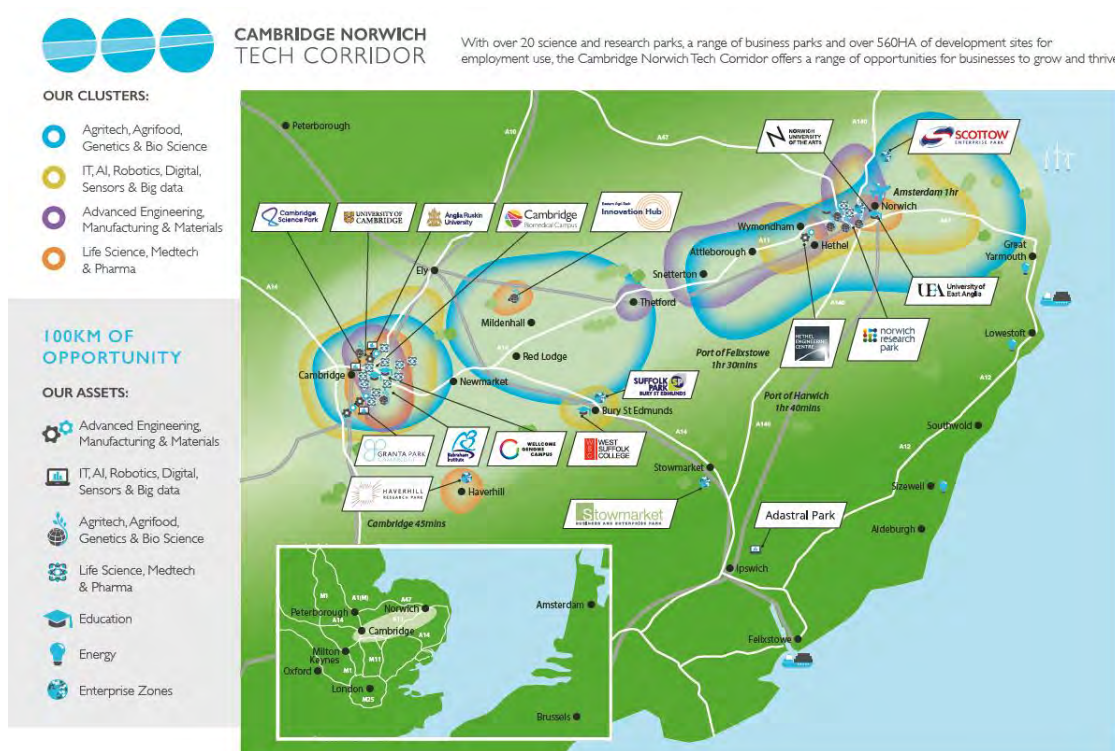
In Norfolk the tech corridor extends through Norwich, South Norfolk and Breckland, and then into Suffolk and Cambridgeshire.

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<sup>41</sup> See [The Norwich Cambridge tech corridor website - http://www.techcorridor.co.uk/](http://www.techcorridor.co.uk/) for further information



Figure 7: The Cambridge Norwich Tech Corridor, 2019



### 5.4.3 A47 Corridor

The A47 crosses the county and, directly or indirectly, affects all Norfolk's districts, parts of Suffolk and Cambridgeshire. The current limitations of the A47 act as a brake on economic growth, hindering investment, adding business and commuter costs, cause disproportionate accident and safety issues and contribute to the 'peripheral' image of Norfolk. Improvements to the road will unlock jobs, increase GVA and attract additional private investment all along its length. The A47 Alliance comprises of representatives from all Local Authorities, the business community, MPs and stakeholders along the whole of the trunk road route between Peterborough and Lowestoft. The Alliance is working to make the case for improvements and to secure the necessary investment to implement these. Partners will need to consider how best to cooperate to realise the economic potential of improvements.

Further west on the A47, at Wisbech the emerging Garden Town proposal may result in up to 12,000 additional homes (on top of the 3,550 homes already allocated in the Fenland Local Plan) effectively doubling the size of the town. This is linked to a potential new rail connection which would put the town within commuting distance of Cambridge and Peterborough. The existing allocation relating to East Wisbech is incorporated into the emerging plan.

Currently there are four A47 road improvement schemes of direct relevance to Norfolk, committed to by Highways England

- Dualling the A47 North Tuddenham to Easton
- Dualling the A47 Blofield to North Burlingham
- Improving the A47/A11 Thicken junction
- Improving A47 Great Yarmouth junctions including reconstruction of the Vauxhall Roundabout

These A47 road improvements have the potential to support growing the corridor's economy.



#### **5.4.4 Offshore Energy Sector / Ports of Great Yarmouth & Lowestoft**

The ports of Great Yarmouth and Lowestoft are successfully developing their role in the huge growth in offshore wind generation and major planned gas field decommissioning in the southern North Sea, building on 50 years' experience in offshore energy. These ports also serve trade, fisheries and transportation sectors of the economy.

These two ports, in close proximity, together form a strategically significant economic (and infrastructure) resource, generating employment and supply chains of regional significance. The sector is also supported by businesses and facilities, such as Norwich Airport, in Greater Norwich. The critical mass of facilities, infrastructure and businesses helps the area compete with areas elsewhere, including on the other side of the North Sea.

There is a long and continuing history of collaboration between Great Yarmouth, East Suffolk, Norfolk and Suffolk Councils to make the most of these opportunities.

Through close cooperation, these bodies and the LEP were successful in bidding for an Enterprise Zone (EZ) covering six sites in Great Yarmouth and East Suffolk to strengthen and build the offshore energy sector in the area. This EZ is one of the most successful in the country, the only zone to have exceeded the original EZ targets. The two Norfolk sites in Great Yarmouth are South Denes and Beacon Park.

Great Yarmouth Borough Council, Norfolk County Council, Highways England and the New Anglia LEP have cooperated closely on developing the road transport infrastructure to support the growth of the offshore energy sector in Great Yarmouth. The third river crossing has now been through public examination as a Nationally Significant Infrastructure Project which will provide direct access to the Port from the trunk road network, rather than through the heart of the town as at present, and improving the A47 link to the rest of the country, construction is due to start in 2021.

Meanwhile Norfolk County Council with Great Yarmouth Borough Council, are looking at a range of new infrastructure projects associated with the port and the Great Yarmouth Energy Park in order to enhance the value of Yarmouth to the offshore renewables sector.

#### **5.4.5 Norfolk Coast, the Broads and the Brecks**

The Norfolk Coast, the Broads and the Brecks are the 3 key cross boundary areas of the county where economic benefits include not only their attraction for tourism and recreation, but also their contribution to quality of life, and hence the attractiveness of Norfolk as an area to live, work and to locate a business. The economies of these areas are dependent on businesses, infrastructure and environmental protection in surrounding areas. This is particularly the case for the Broads Authority Executive Area, where the Broads Authority boundary is very tightly drawn.

In order to maximise the economic benefits a number of issues require coordination across planning authority boundaries, including coastal change, erosion and flooding; environment, landscape and habitats; as well as tourism and recreation itself. By working together the relevant authorities can ensure complementary measures, and maximise potential economic benefits.

All the Norfolk coastal districts, together with the Broads Authority (part of which is on the coast), East Suffolk District Council in Suffolk, and the Environment Agency have worked together on one or more of the three Shoreline Management Plans covering the Norfolk Coast, developing understanding of the technical and political challenges involved, and coordination of efforts to address these.



The quality, importance and diversity of the natural environment, including the Coast, the Broads and the Brecks, is reflected in the numerous national and international designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, and Sites of Special Scientific Interest (SSSIs), and protected landscapes (Norfolk Coast Area of Outstanding Natural Beauty and the Broads). The planning authorities have a role in helping to protect and manage these assets, along with Natural England, the Environment Agency and a wide range of non-statutory environmental and community organisations. Ensuring that new development can proceed sustainably without harm to protected sites or species, or to biodiversity or geodiversity in the wider environment, is a particular challenge. Through joint working and cooperation across planning authority boundaries, a better understanding of the potential impacts from development (especially relating to housing and recreation) is being developed, and new ideas and best practice for monitoring and mitigating any impacts are being shared.

It is important that all of this care and concern about the natural environment continues to be captured within a Green Infrastructure approach, so that protecting and enhancing nature and natural processes are consciously integrated into spatial planning and area development.

#### **5.4.6 A10 corridor**

The A10, and parallel rail line from King's Lynn to Cambridge (passenger and freight), provides a strategic transport corridor. The section from King's Lynn to Downham Market is identified as a growth location in the Norfolk and Suffolk Economic Strategy. To realise the growth potential of the A10 Corridor there is a need to improve journey times, reliability of services and enhancement of operational capacity. Cambridgeshire County Council has commissioned studies of the economic potential and transport options for the route north of Cambridge. The Ely Area Capacity Enhancements Strategic Outline Business case was completed in Spring 2020 and has been approved. Proposals and options are expected to be consulted on in 2021 for the Ely area improvements to enable more frequent rail services to operate in future; while works have been completed to enable longer trains to run from King's Lynn from December 2020. A new Cambridge North railway station has enabled improved access to jobs in the businesses on the north side of Cambridge for Norfolk residents. There is potential for large-scale job growth in the corridor at Downham Market; while the largest housing allocation in the west at West Winch/North Runcton requires the completion of the West Winch Relief Road and Hardwick junction improvements to be fully developed.

**Agreement 10 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.**



## Section 6 – Housing

### Strategic Housing Objectives

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes in line with the Economic Strategy of the New Anglia LEP and, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

### 6.1 Introduction

The overall objective of national policy is to ensure that sufficient homes of the right type, are built in the right locations, and at the right time to address all existing and newly arising needs for homes. This means meeting both the market *demand* for new housing and addressing the *need* for homes including the needs of those who are currently unable to afford to buy or rent a suitable home locally. Homes built should be of the right type having regard to needs of the existing and future population and should address the specific needs of groups such as the elderly, those with disabilities, students and the gypsy and traveller community. Local Plans should include measures to address the need for appropriate specific types of dwellings, those wishing to build their own home, starter homes to purchase and other tenures of affordable housing. Whilst this document considers the likely scale of growth in the different parts of the County, it is not its purpose to determine how many new homes are required or where precisely these should be located. These will be decisions for individual Local Plans or any County wide development plans which may be prepared. Instead the focus is on cross boundary strategic considerations concerning, for example, the capacity of each authority to accommodate the required growth, considering how growth in one area may have impacts elsewhere, the need or otherwise to redistribute growth beyond the administrative boundaries of individual authorities and the implications of this, or the need to take collective measures to improve the rates of housing delivery in the County.



In February 2017 the Government published the Housing White Paper “Fixing our Broken Housing Market”<sup>42</sup>. This document set out a broad range of reforms that Government planned to introduce to help reform the housing market and increase the supply of new homes with the principal aim of increasing housing delivery in England to 300,000 net additional dwellings per year by the mid 2020’s.

Many of these measures were subsequently introduced via the updated National Planning Policy Framework including a new standardised national methodology to be used for calculating the minimum number of new homes which might be required. In December 2020 the government announced a further modification to the standard methodology for the top 20 cities and urban areas, however this hasn’t impacted the county. The government has also introduced a Housing Infrastructure Fund<sup>43</sup>, published a Garden Communities Prospectus, invited bids for Housing Deals, and has committed to spending an additional £2 billion on affordable homes, all measures targeted at delivering an increased supply of homes. It is clear that increasing the delivery of new homes is likely to remain a major priority for the UK government for the foreseeable future.

Based on the government’s current standard methodology<sup>44</sup> Norfolk Authorities will need to collectively plan for at least an additional 65,856 (4,116 per annum) homes between 2021 and 2036. Many of these new homes are already included within adopted Local Plans in the County and a significant proportion already have planning permission.

As part of the duty to co-operate, and as reflected in the remainder of this section the Norfolk Authorities have reached a number of key agreements both about the geographical area over which it is most appropriate to prepare Local Plans, the period to be planned for, and how each plan will provide at least the minimum number of dwellings required over the agreed period. In reaching these Agreements the authorities have had regard to the needs which may arise from outside of the County and have collectively agreed a process for establishing each areas capacity to accommodate growth.

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<sup>42</sup> Available at [the housing white paper web page - https://www.gov.uk/government/collections/housing-white-paper](https://www.gov.uk/government/collections/housing-white-paper)

<sup>43</sup> Available at [the housing infrastructure fund web page - https://www.gov.uk/government/publications/housing-infrastructure-fund](https://www.gov.uk/government/publications/housing-infrastructure-fund)

<sup>44</sup> Derived from the ONS 2014 household projections



## 6.2 Existing targets, supply, and delivery rates up to 2021

The number of dwellings built in the County since 2007 have generally fallen behind published Local Plan targets due to the impact of the recession. As a consequence, the required annual rate of housebuilding required to meet existing Local Plan targets has been increasing as local authorities seek to address shortfalls. Furthermore to ensure that local targets can be addressed national policy<sup>45</sup> requires that each authority provides a buffer of deliverable supply thus ensuring that at all times more deliverable supply is available than is required to meet needs alone, with the size of the buffer determined by delivery rates over the preceding three years. This has resulted in some areas having very high annual targets over the next five years which are well above the long term requirements set out in their respective Local Plans or produced by applying the standard methodology.

It is likely that this trend of increasing annual rates of housebuilding requirements will not continue in the future, for two reasons: firstly, the rate at which housing is being delivered is increasing; and secondly, local planning authorities need to keep their assessments of housing need and local plans up to date. In reviewing housing need, the appropriate level of backlog that needs to be addressed is reconsidered and in parts of the County it appears that current levels of backlog arise in part from historic projections of levels of net in-migration in the period 2008-16 being considerably higher than the actual net in-migration levels that were observed during this period. Therefore, as new Local Plans are adopted, there may be tendency for rates of housebuilding required in the short term (i.e. the next five years) to reduce from their current levels due to reassessment of the backlog element within them.

It should also be noted that land supply issues may ease because since the recession and particularly the publication of the National Planning Policy Framework in 2012, the number of unbuilt planning permissions has also been increasing, resulting in a large stockpile of consented sites.

In practice, delivery rates of housing development will vary considerably from one year to the next, with significant periods of under-delivery in some years and over-delivery in others, depending on a wide range of factors including site availability, economic conditions, and the capacity of the local building industry. The impacts of the coronavirus pandemic on completion rates also remains unclear. For this reason annualised targets represent a blunt instrument against which to assess delivery. Individual authorities will continue to consider carefully how new housing needs evidence might be taken into account appropriately in plan-making and the determination of planning applications.

Detailed information on the availability and deliverability of new housing is published annually by each authority in their Five Year Land Supply Statements.

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<sup>45</sup> National Housing Delivery Test – Results of this test are published by government in November of each year and compare the number of dwellings built over a three year period with the number required.



### 6.3 Future Housing Demand and Need until 2036.

The National Planning Policy Framework requires that the need for homes in terms of quantity, size, type and tenure within an area is addressed by planning authorities when preparing Local Plans, unless the consequences of doing so would result in unsustainable development. Where planning authorities conclude that it is not desirable to address identified needs within an individual authority area they should reach agreement with others to ensure that needs are met.

Following the publication of the revised NPPF in Feb 2019 the quantity of homes needed should be calculated in accordance with the new standard method in national guidance. This applies a fixed uplift to household projections based on the relationship between local incomes and house prices for each authority area with the result being capped to ensure that resulting figures are no more than 40% above existing requirements for any individual authority. The method was varied in February 2019 to make it clear that the baseline for the calculation should be the 2014 based household projections rather than the most recent projections. In some parts of the County the application of the standard methodology has resulted in the need to deliver higher quantities of new homes than was previously the case as identified in Strategic Housing Market Assessments.

**Table 9: Local Housing Need based on mid 2014 household projections applying standard national methodology using the projected average annual household growth from 2020 to 2030 (correct as at November 2020)**

Area	Annualised housing need in SHMAs	Annualised housing need applying standard methodology (2014 base)	Variation
<b>Breckland</b>	584 <sup>46</sup>	661	+77
<b>Broadland</b>	389	517	+128
<b>Great Yarmouth</b>	420	357	-63
<b>KLWN</b>	670	538	-132
<b>North Norfolk</b>	405	552 <sup>47</sup>	+147
<b>Norwich</b>	724	598	-126
<b>South Norfolk</b>	763	893	+130
<b>Broads Authority (Norfolk part)</b>	11	n/a <sup>48</sup>	
<b>Norfolk</b>	3,966	4,116	+150

<sup>46</sup> Note as the Breckland Local Plan is covering a period of 2011-36 it's annualised OAN is considered to be 612pa rather than 584pa as this reflects under delivery in the period 2011-15

<sup>47</sup> At this point in time North Norfolk is considering if an alternative approach to establishing OAN is justified

<sup>48</sup> The Government Consultation said 'where local planning authorities do not align with local authority boundaries, such as National Parks, the Broads Authority and Urban Development Corporations, available data does not allow local housing needs to be calculated using the standard method set out above'. In these cases we propose that authorities should continue to identify a housing need figure locally, but in doing so have regard to the best available information on anticipated changes in households.



The evidence<sup>49</sup> concludes that Norfolk is covered by all, or parts of, three separate Housing Market Areas and this has led to agreement about producing evidence and appropriate planning areas.

Strategic Housing Market Assessments have been prepared for each of these Housing Market Areas which prior to the publication of the Standard National Housing Needs Methodology identified the objectively assessed needs for new homes within each HMA and for each separate District within them. New evidence, including revised national population and household forecasts, will be published at regular intervals and Authorities will use the latest available information from a range of sources in relation to both demand, and their ability to plan a sustainable supply, when determining final housing targets for inclusion in Local Plans.

To ensure better alignment of Local Plans all Norfolk Authorities have agreed to prepare new Local Plans which address the level of housing need for the period until at least 2036 and have formally commenced the process of plan review. Broadland, Norwich and South Norfolk are producing a single Greater Norwich Local Plan allowing for consideration of how needs might be addressed across the larger plan area.

**Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.**

#### The Broads

The total OAN in the Broads Authority Executive Area between 2015 and 2036 is 286 dwellings (approx. 14 per year). In the Central Norfolk SHMA these figures are broken down between the overlapping Districts as follows:

**Table 10: Projected dwelling need within the Broads Authority area 2015-2036**

	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	East Suffolk
<b>Total OAN</b>	50	70	3	40	66	57

<sup>49</sup> **Central Norfolk Strategic Housing Market Assessment 2017** - covering Norwich, Broadland, and South Norfolk authorities, together with substantial parts of North Norfolk, Breckland and the Broads Authority, together with a more marginal interaction with other parts of Norfolk and Suffolk. **King's Lynn and West Norfolk Strategic Housing Market Assessment** - Covering the administrative area of King's Lynn and West Norfolk Borough Council.

**Great Yarmouth Strategic Housing Market Assessment** - Covering the administrative area of Great Yarmouth Borough Council.



In view of the special qualities of the Broads there has been a long standing agreement between the BA and their overlapping local councils about the other areas planning to meet any housing needs arising in the BA area<sup>50</sup>. It would clearly not be in the best interests of good planning in Norfolk for planning in the Broads area to be driven by a need to meet statistically derived housing targets where this would be incompatible with the protection of the special qualities of the Broads. Agreements 11 and 12 below addresses this matter although it should be noted that emerging evidence suggests, with the possible exception of the part of the BA area in Great Yarmouth Council area, that the BA will be able to find sufficient sites for housing to meet identified needs within its own area in locations considered to be compatible with the protection of the Broads.

**Agreement 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.**

**Agreement 13 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.**

East Suffolk Council (and hence not signatories to this framework) have also agreed to do the same.

#### **Implications of the City Deal for Housing**

In December 2013 the Greater Norwich City Deal was signed<sup>51</sup>. The City Deal was expected to see 300 new businesses supported and secure an additional £100 million of private investment. The deal was also expected to create more than 19,000 jobs, including 3,000 high value jobs at Norwich Research Park, 2,000 jobs around Norwich Airport, 1,000 jobs based around Norwich University of the Arts and 6,000 construction jobs.

The housing implications of the City Deal were assessed thoroughly as part of the Central Norfolk SHMA. This calculated that an upward adjustment of 9,505 dwellings to the housing requirement was needed to ensure sufficient homes are provided to meet the needs of the additional workers resulting from the City Deal. However, as the OAN for the Central Norfolk Authorities already included a response to market signals, it concludes that additional provision is only needed in the three Greater Norwich districts where the implications of the City Deal exceed the response to market signals already built into the figures. Because of the changes in calculating housing need the additional provision will be reconsidered within the Greater Norwich Local Plan.

**Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.**

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<sup>50</sup> See [Planning for Housing and Employment in and Around the Broads Memorandum of Understanding - http://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0008/432998/Duty-to-Cooperate-Planning-For-Housing-and-Employment-in-and-Around-the-Broads-Proposed-Memorandum-of-Understanding-040113.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0008/432998/Duty-to-Cooperate-Planning-For-Housing-and-Employment-in-and-Around-the-Broads-Proposed-Memorandum-of-Understanding-040113.pdf)

<sup>51</sup> See [Norwich City Deal - https://www.gov.uk/government/publications/city-deal-greater-norwich](https://www.gov.uk/government/publications/city-deal-greater-norwich)



## 6.4 Type of Homes

It is critically important to ensure that sufficient homes are provided but it is equally important that the homes that are built are the right type in terms of size, affordability and tenure. In this regard key issues affecting the County are providing suitable homes for:

- Those on lower household incomes who are unable to afford market prices and rents
- A rapidly aging population
- A growing student population in and around Norwich
- Gypsy and Traveller communities

Collectively, the Authorities are committed to the delivery of energy efficient homes which minimise the inefficient use of scarce resources and each Local Plan will consider the desirability of requiring enhanced construction standards which go beyond the requirements of the current National Building Regulations. For example, all authorities in the County have committed to introducing lower water consumption targets for new dwellings and most are likely to introduce enhanced accessibility requirements. Further consideration is also given to this area in the section on climate change.

Unless there is a significant increase in earnings or a slowing rate of house price increases the evidence concludes that dwelling affordability will continue to be a major issue in most parts of the County. Delivery of affordable homes, as with other types of housing has failed to keep pace with existing and newly arising needs. Forecasts indicate that across the County as a whole some 26% of the total future housing requirement will need to be provided as affordable homes but this masks significant local variations.

The significance of this issue for Norfolk should not be underestimated. There would be particularly severe impacts on a number of key economic sectors if housing affordability worsens and there is not considerable increase in the availability of forms of housing that meet the needs of people who are employed in low wage sectors across the county. The situation will vary from one council area to another so is best addressed through local plans rather than through collective agreement.

Inward migration from the rest of the UK, mainly due to retirement to the area, is forecast to be the major driver of population growth in the County over the next 20 years and a rapidly aging population, particularly outside of the three main urban centres will continue to increase the need for homes. By 2036 over 15% (153,372 people) of Norfolk's population is forecast to be over 75 years of age and if current trends continue this will increase the need for specialist forms of accommodation such as care, nursing and assisted living schemes. These specialist accommodation needs are not included within household projections and authorities should carefully consider the latest available evidence and develop strategies to ensure these needs are met. If current trends continue an increasing proportion of elderly people will remain in their homes for longer periods.

### Specialist types of accommodation

Strategic Housing Market Assessments are prepared to establish the likely total need for new dwellings over a given period. These assessments quantify the needs of those residing in households including gypsy and travellers and those living in caravans and houseboats but they do not account for those living in other types of communal accommodation such as care and nursing homes and student halls of residence. Therefore in addition to the target for new dwellings Local Plans will need to separately quantify and provide for other specialist types of accommodation and fully understand the relationship between the need for new dwellings and the need for different types of non-household accommodation.



## Elderly People

The identified Objectively Assessed Need across Norfolk includes the conventional housing needs of elderly people, but does not include people residing in care and nursing homes. On this basis, all self-contained elderly person housing is counted within the housing supply; but the supply of bed spaces in residential institutions (Use Class C2) is not. If sufficient Class C2 bed spaces are not provided then these people will not vacate existing dwellings and therefore more dwellings may be required.

As section 4 highlights, latest population projections estimate an increase in 65's of over 78,000 between 2018 and 2036 in the county. Local planning authorities were clear that further research was required into their housing needs. As part of the work to update this document a study was commissioned to identify the need and types of accommodation which are required to support the increase in the elderly population going forward.

The study has now been completed and highlights that a range of housing types are required to meet the needs of the elderly. It should be noted the many residents will be able to remain in conventional type of housing for many years but may choose to downsize or move to more suitable types of home like bungalows. Therefore housing types range from conventional housing (either modified or unmodified), age exclusive housing, sheltered housing with low level support to higher level support housing with on-site support or residential/nursing care homes. There are currently 8,612 units of specialist independent retirement housing in Norfolk, 78% of these units are sheltered<sup>52</sup> housing with low level support and only 22% are extra care with higher level support<sup>53</sup>. Across the whole of Norfolk in 2020 there is unmet need for 2,826 units of extra care housing and 4,034 units of sheltered housing. By 2041 these figures will have risen to 5,149 and 10,384 respectively. The report also highlights that care homes will also need to accommodate an additional 5,239 people and better provision should also be made for elderly with various levels of dementia with Norfolk likely to see an increase in residents with dementia by nearly 10,000 to 2041. Full details can be found in the report accompanying this study<sup>54</sup> Norfolk Local Authorities will work with registered providers and housing associations to support the delivery of specialist housing to meet the needs of an increasingly the elderly and retired population.

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<sup>52</sup> Sheltered housing is age restricted housing normally with either an onsite or visiting scheme manager or access to a bespoke helpline. There will normally be communal facilities which may include a café or shop but there is no bespoke site specific care package. Scheme residents are typically 75 or over, but the scheme may include some residents aged 65-74

<sup>53</sup> Extra Care housing is age restricted housing with an onsite scheme manager and provide a range of communal facilities. However residents will also have access to a site specific bespoke care package, usually including paying for a specified minimum number of hours of care a week with the option to increase usage if required. The care provider is CQC registered with specific carers allocated to the scheme. Scheme residents are typically 75 or over. Extra care housing can also be known as very sheltered housing, assisted living, enhanced sheltered or as housing with care.

<sup>54</sup> Link to study once published



## Student Housing and the OAN

Planning Policy Guidance was updated in March 2015 to include specific reference to identifying the needs of students. It requires that Local Planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campuses.

The largest higher education provider in Central Norfolk is the University of East Anglia (UEA). The University has a campus in Norwich and a total of 16,030 full time students (academic year 2018/19). In 2017 the University had 4,300 bed spaces on the campus (and nearby village) and 305 bed spaces in the city. Norwich also contains the Norwich University of the Arts which has 2,250 full-time students, with further students at City College and Easton College. In recent years however, there has been an increase in the provision of privately owned and managed purpose built student accommodation across Norwich City including significant accommodation at Pablo Fanque House, Ber Street and St Stephen's Towers.

The Central Norfolk Strategic Housing Market Assessment concludes that based on historical trend the student population in and around Norwich is likely to grow by around 420 students per year. The SHMA assumes that this student population will live in dwellings and this need is added to the OAN requirement for new homes. If accommodation is provided in the form of student halls of residence or other specialist student accommodation provided by the private sector the OAN dwelling requirement can be reduced accordingly at a suggested ratio of one dwelling reduction for each three bed spaces provided.

However, in 2018 Planning Practice Guidance updated the advice on including student housing within housing supply figures<sup>55</sup>. Student accommodation can be included based on the amount of accommodation that new student housing releases to the wider housing market, and the extent to which this allows general market housing to remain in such use. Local authority's calculations should be based upon the average number of student living in student only accommodation using the most recently published census data. On this basis, student accommodation supply in Norwich should be counted at a ratio of 2.85 bedrooms to 1 equivalent dwelling, except for studio apartments which can be counted on a 1 for 1 basis. For delivery purposes, the Housing Delivery Test Rule Book<sup>56</sup> outlines that student accommodation should be counted at a ratio of 2.5 bedrooms to 1 equivalent dwelling. These ratios will be updated as necessary.

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<sup>55</sup> [Planning Practice Guidance - https://www.gov.uk/guidance/housing-supply-and-delivery](https://www.gov.uk/guidance/housing-supply-and-delivery) Paragraph: 034  
Reference ID: 68-034-20190722

<sup>56</sup> [Housing Delivery test - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728523/HDT\\_Measurement\\_Rule\\_Book.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf)



The City Council also adopted the Purpose Built Student Accommodation (PBSA) Evidence and Best Practice Advice Note<sup>57</sup> in 2019. This advice note includes an assessment of the need for PBSA from UEA and NUA higher education institutions, guidance on a range of issues relating to the design and management of PBSA and how to encourage a mix of accommodation for a wide range of students. By encouraging good quality and appropriate student accommodation in Norwich, this advice note helps to support the success of the city's higher educational institutions and the city's economic prospects. As part of this Norwich City Council has set up a working group with the two main higher education institutions in Norwich that are likely to generate student housing need, and meets periodically to discuss how to help meet the need for PBSA in terms of student numbers and growth, to better inform planning decision making and the plans of Higher Education Institutions and to provide a forum to explore how high quality and affordable student accommodation can be achieved in Norwich.

The draft Greater Norwich Local Plan, due to be published for Regulation 19 consultation in February 2021, will contain a policy to support PBSA as part of policy 5(Homes).

### **Accommodation needs of Gypsies, Travellers, and other types of accommodation**

The accommodation needs of Gypsies and Travellers, including Travelling Show people, and those residing in boats and mobile/park homes are included within the overall assessments of housing need and comprise part of that need rather than an additional requirement. These types of accommodation which are provided can therefore count towards addressing locally set housing targets. Locally authorities have prepared specific evidence to quantify the levels of need for such accommodation and use this evidence to inform Local Plan preparation. Five Norfolk authorities (Broadland, Gt Yarmouth, North Norfolk, Norwich and South Norfolk), plus the Broads Authority, commissioned a Caravans and Houseboats Needs Assessment to 2036, which was completed in October 2017<sup>58</sup>. Breckland DC commissioned its own study<sup>59</sup> and the Borough Council of King's Lynn and West Norfolk is a partner in a Cambridgeshire-based needs assessment<sup>60</sup>. Greater Norwich are updating their study and this is expected to be completed in spring 2021.

**Agreement 15 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.**

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<sup>57</sup> [Purpose Built Student Accommodation \(PBSA\) Evidence and Best Practice Advice Note -  
https://www.norwich.gov.uk/downloads/file/5448/pbsa\\_best\\_practice\\_and\\_advice\\_note\\_-\\_adopted\\_november\\_2019](https://www.norwich.gov.uk/downloads/file/5448/pbsa_best_practice_and_advice_note_-_adopted_november_2019)

<sup>58</sup> See [Caravans and Houseboats Needs Assessment to 2036 - https://www.norfolk.gov.uk/media/4081/norfolk-final-ana-09-10-17.pdf](https://www.norfolk.gov.uk/media/4081/norfolk-final-ana-09-10-17.pdf)

<sup>59</sup> See [Breckland Gypsy and Traveller Accommodation Assessment -  
https://www.breckland.gov.uk/media/2662/Breckland-Gypsy-and-Traveller-Accommodation-Assessment/pdf/2016\\_11\\_29\\_Breckland\\_GTAA\\_Final\\_Report.pdf](https://www.breckland.gov.uk/media/2662/Breckland-Gypsy-and-Traveller-Accommodation-Assessment/pdf/2016_11_29_Breckland_GTAA_Final_Report.pdf)

<sup>60</sup> See [West Norfolk Gypsy and Traveller Assessment - https://www.west-norfolk.gov.uk/download/downloads/id/2579/gypsy\\_and\\_traveller\\_accommodation\\_assessment\\_2016.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/2579/gypsy_and_traveller_accommodation_assessment_2016.pdf)



Other forms of specialist accommodation such as self-build and accommodation for military personnel will be addressed by individual authorities but the Norfolk Strategic Planning Member Forum will keep this position under review.

## **6.5 Capacity and Distribution**

Some parts of the County are more constrained than others and their capacity to accommodate new growth is similarly variable.

Each Authority has prepared Housing and Economic Land Availability Assessments (HELAAAs) using a standardised methodology which has been agreed by all Authorities. These are assessments of unconstrained capacity and take no account of the policy choices that each authority may make when preparing their Local Plan. It is anticipated that Norwich City, Broadland and South Norfolk will work jointly to address their shared housing need through the Greater Norwich Local Plan with other District Authorities having the capacity to address its own housing need.

**Agreement 16 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.**

## **6.6 Delivering Housing Growth**

Over the past decade the quantity of new homes delivered in the County has not kept pace with published targets notwithstanding that the number of planning permissions granted typically exceeds the required quantity of development. This is likely to have been compounded by economic recession and poorer housing market conditions in some areas which may have reduced developer confidence.

Slower than required delivery rates have resulted in inadequate or marginal five year land supply positions resulting in the need to release unplanned development sites in some parts of the County. Recognising this, and reflecting the provisions of the Housing White Paper the Norfolk Authorities have agreed to take a range of actions to improve future housing delivery.

**Agreement 17 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:**

- **Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.**
- **Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.**

However, such is the scale of delivery challenge facing the County there may well be the need for further actions to be taken to ensure housing targets can be met. Norfolk authorities jointly commissioned a study to look further into the issues impacting delivery within the county. The report highlighted 10 measures to be considered which will be further addressed by Local Authorities in bringing forward their Local Plans:

- Allocating a balanced range of sites and scales of development
- Enable early stage engagement with high profile councillors and leader of the Council to facilitate stakeholder buy-in and community liaison at the site allocation stage.



- Support and encourage allocation and development of retirement developments, single storey dwellings, lifetime homes and extra care facilities for independent elderly living in suitable environments
- Use Planning Performance Agreements where appropriate for larger scale and more complex housing sites
- Employ or nominate strategic development officers to focus on larger scale growth allocations and assist developers through the planning process. These staff may be a shared resource between neighbouring authorities.
- Seek to invoke Service Level Agreements for Utilities and Network Rail related infrastructure where large scale sites are reliant on strategic interventions.
- Review the s106 approach for larger scale sites and consider a hybrid approach with early phases considered in more detail than later phases to enable flexibility for sites which have longer timeframes.
- Facilitate the creation of a county-wide developer forum
- Consider whether statutory powers can be used to assist with unlocking difficult sites
- Work up a funding strategy with the local highway and flood authorities to support sites where major infrastructure is required and this is not covered by CIL.

Alongside these possibilities there may also be other measures taken which would complement these actions:

- Greater support with infrastructure planning in relation to large scale plans for urban expansion to increase confidence and reduce risks for the industry and make them more attractive for housebuilders to build out at quicker rates than in the past. Increasing the number of housebuilders active in the Norfolk market and increased use of modular (off-site) building techniques will also assist here;
- Action to stimulate the SME's in the construction sector to increase the number of firms capable of building on the scale of sites that typically result in 5-50 dwellings being provided;
- Action to stimulate the self and custom build sector considerably.
- Further joint working to improve the speed, customer focus, predictability and efficiency of the planning system; and
- A considerable drive to increase the number of people entering the construction sector across the board, particularly in the light of the probable impact of Sizewell C construction on the market of skilled construction labour in Norfolk.

It should be noted that authorities housing delivery will be measured against the Housing Delivery Test (HDT) and if under 95% - authorities will be required to produce 'Action Plans' to address shortfalls in delivery.



## Section 7 – Health

### 7.1 Introduction

The origins of the planning system are closely associated with wider health improvements and recognise that where people live, work, study and relax play a greater role in health and well-being at a population level than just access to health care. Equally we know that as population size and structure change, for example an aging population, so the demands upon health care facilities increase alongside the ever increasing need to prevent ill health in the first place. These matters are not influenced solely on an individual planning authority basis. Services are arranged and delivered across multiple boundaries. People move between areas to do different things and across their lifetime. Transport routes and methods inevitably impact wide geographic areas.

Health services in Norfolk are provided at geographies which extend beyond district and borough boundaries. The Norfolk and Waveney Clinical Commissioning Group covers the whole of Norfolk and also the former district council area of Waveney (in north-east Suffolk). Public Health provision is provided at the national, regional and local level (subject to recent national changes).

Given that the various healthcare organisations operate across district and borough boundaries it is considered that there is merit in looking at consistent approaches to planning for health and well-being across the Norfolk local planning authorities.

Consequently, the need to co-operate between agencies and across geographies is important.

### 7.2 Principles

The National Planning Policy Framework (NPPF) requires that ‘planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles’<sup>61</sup>. The health and wellbeing of the population, and health infrastructure should be considered in both plan and decision making.

The Planning White Paper (2020 paragraph 1.7) recognises that: “Where we live has a measurable effect on our physical and mental health, on how much we walk, on how many neighbours we know or how tense we feel on the daily journey to work or school. Places affect us from the air that we breathe to our ultimate sense of purpose and wellbeing.”

The TCPA has advocated the impact of good planning decisions through its Reuniting Health with Planning workstream since 2010 and has worked in partnership with NHS England, Public Health England and Sport England.

The review of Health Equity in England by Sir Michael Marmot<sup>62</sup> highlights the need to build healthy and sustainable communities as one of 6 core recommendations to address the widening health inequalities. It states that ‘since 2010 life expectancy in England has stalled; this has not happened since at least 1900.....health is closely linked to the conditions in which people are born, grow, live, work and age’. There are clear links made to the quality, cost and condition of housing in the report,

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<sup>61</sup> NPPF revised Feb 2019, Chapter 8

<sup>62</sup> See [Health Equity in England - https://www.health.org.uk/funding-and-partnerships/our-partnerships/health-equity-in-england-the-marmot-review-10-years-on](https://www.health.org.uk/funding-and-partnerships/our-partnerships/health-equity-in-england-the-marmot-review-10-years-on)



‘The costs of housing have increased significantly, including social housing, impacting on all the other social determinants of health and pushing many people into poverty, homelessness and ill health.’

The need for health infrastructure provision takes place in the context of:

- Stalling of life and healthy life expectancy rates (in the last decade 2011 onwards)
- Widening health inequalities and likely aggravation of this arising from impacts of Covid-19
- An increasingly ageing population, with impacts on health and social care provision and costs<sup>63</sup>
- The number of premature deaths increasing, caused by smoking, lack of physical activity, obesity and alcohol misuse.<sup>64</sup> The UK wide NHS costs attributable to overweight and obesity are projected to be £9.7 billion a year by 2050 with wider costs to society estimated to reach £49.9 billion per year<sup>65</sup>
- Increase in demand for mental health and wellbeing services
- Changing approaches to healthcare delivery.

### **7.3 Healthy living and Wellbeing – through better design**

It is clear that health issues are increasingly important considerations in future planning activities. Therefore, development should facilitate a healthy lifestyle and provide opportunities for a high quality of life through a healthy environment where pollution is controlled and there is adequate access to open spaces and green and blue infrastructure. Availability of suitable and affordable housing and employment opportunities are also critical factors, as is access to active travel opportunities and affordable and practical public transport. It is also likely that, at least in the short to medium term, active consideration will need to be given to increased home working, space standards and overcrowding in homes and internal ventilation.

New developments present an opportunity to build homes, streets and neighbourhoods that support and enable healthy lifestyles through high quality provision of walking, cycling and accessible public transport. Good quality public spaces promote a sense of community and increase the variety of options to interact with the local environment and improve physical and mental health outcomes.

Both new and redesign of existing developments should consider a variety of needs of the Norfolk population. These could include:

- Recognising that greatest health benefits across the population are to be had by encouraging the inactive to be moderately active so build short active journeys in everyday life such as shopping, schooling, catching a bus and work
- Considering the particular needs of an ageing population when designing open space, access to public transport and physically active means of getting about. For example, siting of

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<sup>63</sup> The King’s Fund: Future Trends, Demography, Ageing Populations

<sup>64</sup> British Heart Foundation, 2013: Economic costs of physical inactivity.

<sup>65</sup> Source: Guidance Health Matters: obesity and the food environment March 2017 (Public Health England)



benches and shelters, availability of toilets, safety when sharing pathways, level terrain and the provision of adult outdoor exercise equipment.

- It is important when designing built environments and making blue and green space more widely available that signage, navigation and layout actively consider needs of those, for example, with dementia or learning disabilities who may otherwise find some designs less accessible
- A number of these considerations may also support their use by, for example, adults with younger children, the less mobile across all age groups and those with a sensory disability
- Signage to facilities could be expressed in time taken to walk, for example, instead of distance and routes designed to break up longer journeys into manageable sizes
- Location of housing, employment, education and retail facilities to minimise journeys by non-private vehicle methods
- Where possible cycle lanes and footpaths should be situated away from busy roads, publicised and well sign posted to encourage use. They can provide opportunities for biodiversity enhancement by planting appropriate tree species, hedgerows and pollen and nectar rich flora, facilitating species movement and habitat connectivity.

The RTPI published Enabling Healthy Placemaking<sup>66</sup> which highlights the barriers to building healthy places<sup>67</sup> called for 'greater ...collaboration between health, social care, and planning professionals to ensure people's health needs are integrated into the conceptualisation, design and planning stages of new developments in the future'. It highlights 7 ways planners can take the lead:



<sup>66</sup> [Enabling Healthy Placemaking - https://www.rtpi.org.uk/media/5777/enabling-healthy-placemaking.pdf](https://www.rtpi.org.uk/media/5777/enabling-healthy-placemaking.pdf)  
published July 2020

<sup>67</sup> Such as lack of funding; different requirements from developers; conflicting policy priorities.



## 7.4 Implementing Healthy Design

The NPPF states that local planning authorities should make use of tools and processes for assessing and improving the design of development, specifically recommending assessment frameworks such as Building for Life 12 (recently updated to Building for a Healthier Life<sup>68</sup>).

[Building for a Healthier Life](#) replaced Building for Life 12 in July 2020; published in collaboration with NHS England, NHS Improvement and Homes England. 'Building for a Healthier life' is a Design Code to help people to improve the design of new and growing neighbourhoods and has been created for community, developer and local authority use. The 12 considerations capture areas of design and placemaking that need most attention but are often the most overlooked<sup>69</sup>. It provides visual prompts to good practice rather than the previous 12 question approach.

The [Healthy Streets Approach](#) is a framework that emphasises a street that works for people and is a street that is good for health. It provides an evidence-based approach for creating fairer, sustainable attractive urban spaces. The Department for Transport has funded Healthy Streets Approach training for Local Authorities (including Norfolk) using Local Cycling and Walking Infrastructure Plans. The 10 indicators focus on the experience of people using streets and complements the use of the Building for a Healthier Life design code.

10 Healthy Street Indicators™



<sup>68</sup> NPPF revised Feb 2019, para 129.

<sup>69</sup> Building for a Healthier Life, pg 5.



## 7.5 Health Infrastructure Protocol

To help ensure these issues are addressed a protocol for joint working between planning, public health and health sector organisations was agreed in 2017 and has been revised to take account of the emergence of the NHS Sustainability and Transformation Partnership (STP). Throughout this revision support has come from several quarters, including each of the Norfolk and Waveney Clinical Commissioning Group (CCGs). The Protocol seeks to explain the relationship of land-use planning to public health, giving an overview of the planning system to health professionals and an overview of health service commissioning structures to land-use planners. There are mutual commitments to discuss development-related pressures on healthcare services and opportunities for high-quality place-making to enable people to make healthier lifestyle choices. The protocol also provides a single point of contact for local planning authorities within the healthcare system for feedback on planning applications and general advice. Working with STP colleagues affords an opportunity for long term planning and growth to be considered alongside health infrastructure needs.

The Protocol seeks for health professionals and town planners to work together to secure new healthcare facilities required as a result of development. To assist with such negotiations modelling data has been used to give an indication of future healthcare requirements for Norfolk. Based on each CCG area, projections are given on future demand for acute hospital beds, intermediate care beds, and the numbers of General Practitioners required. The population increases are modelled on low, medium and high scenarios for house-building rates, reflecting the uncertainty as to how economic conditions might affect the house-building industry in coming years. The Protocol also includes a *Health Planning Checklist* that consists of six place-making themes. Whilst use of the Checklist is not mandatory; it is simply made available to all practitioners as a convenient method to appraise development schemes in advance of, or at the point of, making a planning application. Additionally there is agreement that within the GNLP area all developments in excess of 500 homes should use a Health Impact assessment. HIA use is to be actively encouraged to tackle health inequalities and the promotion of good health across all areas alongside wider use of both HIAs and the checklist to actively consider designing in health benefits.

The Protocol should be reviewed by the middle of 2022 to take into account the specific health issues in the county; any changes required in the duty to co-operate and other changes currently drafted within the Planning White Paper.

**Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.**



## Section 8 – Climate Change

### 8.1 Introduction

In Summer 2019 the Norfolk Strategic Planning Member Forum requested that a Climate Change sub group should be set up as part of the update process to the Norfolk Strategic Planning Framework. The group would review information in relation to Climate Change with a specific focus on the role and impact on Local Plans and the planning system generally. It would also explore some of the emerging policy work around climate change, and looks at best practice where applicable..

### 8.2 Background

Climate change has been embedded into Land Use Planning for many years, significant emphasis is placed on planners to address climate change through achieving sustainable development. It is recognised that considerable national, international and local research in relation to climate change has been completed in recent years. This includes reports by the Intergovernmental Panel on Climate Change, and there continues to be emerging changes in relation to Government policy on the matter.

In June 2019 the government amended the Climate Change Act 2008 to extend the national carbon reduction target within it with the aim to reduce carbon levels to net zero by 2050. In December 2020 the government also announced a new plan which aims for at least a 68% reduction in greenhouse gas emissions by the end of the decade, compared to 1990 levels<sup>70</sup>. Many local authorities were galvanised to either declare climate emergencies, and/or set their own locally applicable targets, either replicating the governments or extending it further as well as enshrining the concept into corporate objectives and Plans.

Within Planning, Local Plans can play a central role in helping to facilitate this key national environmental objective. Effective strategic plan making can deliver sustainable development and help address the challenges that climate change brings, complementing measures outside of the planning sphere but not resolving climate change challenges on its own. Clearly the County is vulnerable to the impacts of climate change through flooding, drought, storm surges, sea rise etc. The costs of climate change are projected nationally to be high and it is emphasised that not taking action could cost more than taking steps to reducing emissions now to avoid the worst impacts of climate change. Sustainable development through land use policies is regarded as a key means of addressing climate change and as such the planning system has a duty to ensure that action is taken to encourage and deliver more sustainable development.

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<sup>70</sup> See [Press Release - https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit](https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit)



### 8.3 Climate Change Next Steps

Working collaboratively through the Norfolk Strategic Planning Member Forum, Local Planning Authority planning officers, along with colleagues from the Environment Agency, Local Enterprise Partnership and Norfolk County Council, worked together to develop ideas which could help local plans address climate change through land use policies at a strategic level. The group have produced a Climate Change Research Paper and sub topic reports which set out a number of approaches for local authorities to consider when drafting local plans. In the light of this work the following agreement has been reached.

**Agreement 19 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to consider to the approaches contained in the NSPF Climate Change research paper when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.**

Furthermore the Planning White Paper strengthens the need for local design initiatives and the work of this climate change group has highlighted that design and best practice climate change guidance could help with both climate change and healthy living initiatives. As such there is a strong case for looking at a Norfolk Design Guide or Charter. It is suggested that the initial steps would be to investigate how this could best be achieved and to what level all authorities are willing to work to a single design guide. It is clear for this to succeed that external and community involvement would be required and we would also need to understand in more detail any proposed changes to the NPPF and legislation, and the existing intentions of each local planning authority with providing further guidance.

A further agreement sets out Local Planning Authorities commitment to investigate the production of a countywide Design Guide:

**Agreement 20 – Norfolk Planning Authorities agree to work together to investigate the production of a county wide design guide and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles**

The design guide would meet the requirements of the National Design Guide and look at other country wide initiatives like Building for a healthy life. Mitigating for and adapting to climate change could be a key consideration of this guide. Individual Local Planning Authorities could still produce their own guide or they can be produced as part of neighbourhood plans.



## Section 9 – Infrastructure and Environment

### Strategic Infrastructure and Environmental Objectives

To realise the economic potential of Norfolk and its people by:

- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure; and
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements to strengthen inward investment.
- strengthening Norfolk's place competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.
- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact on, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- reducing unnecessary car use and supporting the roll out of new technologies (such as Electric Vehicles and alternative fuels eg hydrogen) and alternative methods of transport including public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

Together these measures will help create healthier more sustainable communities.

To improve the quality of life and health for all the population of Norfolk by:

- promoting development and design which seeks to actively improve health, prevent ill health and tackle widespread health inequalities
- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at local level.



To improve and conserve Norfolk's rich and biodiverse environment by:

- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;
- protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- minimising, where possible, development on the best and most versatile agricultural land; where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- protecting, maintaining and, enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources; and
- Protecting and enhancing water, air, soil and other natural resource quality where possible.

## 9.1 Introduction

Infrastructure and Environmental objectives have been considered together in the context of the Norfolk Strategic Planning Framework. The issues addressed are complex and multi-faceted and much of the work that has been completed on this subject by working closely with appropriate expert groups.

As is reflected in the introductory text in this framework and is recognised in the agreed vision and objectives the future economic and social prospects for the County cannot be divorced from issues of environmental protection and infrastructure provision. The quality of Norfolk's environment, both in terms of the countryside, it's historic City and the wide range of distinctive towns and villages it includes, give access to a quality of life which is one of the key selling points of the County and the retention and enhancement of which will be crucial to attracting the growth in highly productive economic sectors that is sought. Yet, as is also noted, Norfolk's infrastructure is comparatively under developed compared to many other parts of the wider South and East of England and will need significant enhancement if growth is to be delivered at the scale envisaged without compromising the quality of life and environment on offer.

It would appear that there is a growing recognition of the comparative under development of Norfolk's Infrastructure and a number of announcements have been made about funding of investment in key infrastructure enhancements, especially in relation to transport. These are detailed later in the document and it will be important to ensure timely implementation of these projects.

The Norfolk Strategic Infrastructure Delivery Plan<sup>71</sup> (NSIDP) has been produced by the County Council working with all the local planning authorities and utility providers. It identifies strategic infrastructure requirements and provides an update on the delivery of a range of projects. The

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<sup>71</sup>See [Norfolk Strategic Infrastructure Delivery Plan](https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies) - <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies>



projects in the NSIDP reflect the key infrastructure needed to deliver the scale of growth ambitions outlined in the NSPF. The NSIDP is a working document that will be regularly updated as information becomes available. A new version of the NSIDP was released in November 2020. The IDP will help co-ordination, implementation, prioritise activity and respond to any funding opportunities. It will also enable Local Authorities to prioritise the release of revenue funding for the development of scheme information to assist the prospects of successful bids being made for capital funding to deliver further projects. As it concentrates on strategic infrastructure it does not identify the full range of infrastructure required for development.

## 9.2 Utilities

To deliver the rate of growth that is planned across Norfolk in the coming years considerable further investment will be needed in utilities infrastructure. A list of the main schemes that are thought to be necessary is outlined below.

**Table 11: Priority Utilities Projects for Promotion<sup>72</sup>**

<b>Project Name</b>	<b>Estimated Start date</b>	<b>Estimated Cost</b>	<b>Likely funding sources</b>
<b>Attleborough Energy Supply</b>	Not Known	£22m	BRP, NALEP, Private Sector
<b>Broadland Growth Triangle Trunk Sewer</b>	Delivery 2011-2026	TBC	Private sector
<b>Sprowston Primary substation</b>	Not Known	£2.5-10m	Community Infrastructure Levy and private sector
<b>Peachman Way Primary Substation</b>	Not Known	£2.5-10m	Community Infrastructure Levy and private sector
<b>Snetterton Heath Energy Supply Long term Requirements</b>	Not Known	TBC	NALEP, Private Sector, BRP
<b>Thetford energy supply (Sustainable Urban Extension)</b>	2021	£6.5m-£9.5m	BRP, NALEP
<b>Thetford energy supply (Thetford Enterprise Park) Phase 1</b>	Not Known	£3m	BRP, NALEP
<b>Thetford energy supply (Thetford Enterprise Park) Phase 2</b>	Not Known	£6.5m	BRP, NALEP
<b>Earlham Substation</b>	Not Known	£2.5-10m	Community Infrastructure Levy and private sector
<b>Cringleford Primary Substation</b>	Not Known	£2.5-10m	Community Infrastructure Levy and private sector

<sup>72</sup> Anglian Water's Long Term Recycling Plan was published in the summer of 2018. Building on this version work has commenced on the drainage and wastewater managements plans, using a nationally agreed methodology, this will be published in 2022.



Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Wymondham water supply connections	Not Known	£22m	Private sector
King's Lynn Sewerage improvements	Not Known	£1.5-1.7m	Community Infrastructure Levy and private sector

The following utilities project have successfully been funded since 2013:

**Under construction or part-completed:**

- Snetterton Energy Supply - £3.6m
- Thetford Water Supply – £9.8m
- Thetford Sewerage Scheme - £2m
- Easton, Hethersett and Cringleford sewerage upgrade - £11m

**Planned, not yet started:**

- Increased Surface Water Capacity North Lynn
- Snetterton Energy Supply Short term power needs £6.1m

### 9.3 Electricity

Provision of energy, particularly electricity is fundamental to housing and economic growth as energy consumers require access to reliable energy supplies. Since 2004, the UK have been a net importer of energy, and this has changed the way we view our energy security (Annual Energy Statement 2014). Housing and employment growth will put a greater strain on the electricity network with many of the primary substations in Norfolk already reaching capacity.

The 33kV main transmission network in Norfolk is the main network for new on-shore electricity providers and major users such as employment sites and large scale residential development. It is essentially three networks with one in the west serving King's Lynn and West Norfolk and extending in a limited way into the western side of North Norfolk and Breckland; one centred in Norwich and extending to Attleborough and the central and eastern parts of North Norfolk; and one serving the towns along the southern border and extending round to Great Yarmouth. This leaves significant, largely rural, parts of the county some distance from potential connections to this network. This particularly applies to a central swathe running north south, and a southern swathe running east west.

The electricity network is subject to a number of operational constraints which challenge the ability to predict the future capacity of substations over the time periods that are typical for Local Plans. UK Power Networks (UKPN) will not normally invest to provide additional unassigned capacity and the costs of capacity upgrades falling on developers can be significant. The ability of developers to reserve supply, and unexpected windfall development adds further uncertainty to the forward planning process. In addition, the power requirements of end users of employment sites can vary significantly and are unknown at the time the land is allocated in a Local Plan.

In developing Local Plans it is clear that Local Authorities will need to work closely with UKPN to ensure that identified locations where housing and employment growth will require strategic



enhancement of the electricity supply networks to support new developments can be delivered without delaying the delivery of development or rendering it unviable. Partners continue to work with UKPN to overcome current constraints and prevent future issues, and to explore mechanisms to ensure the cost of electricity infrastructure is shared proportionately between planned developments. To support this partners are working with UKPN to ensure there is more detailed information available to authorities providing an understanding of potential constraints and where development will require strategic enhancement of the electricity supply networks. Some Norfolk Planning authorities have also completed electricity infrastructure studies to investigate power supply issues and assess local constraints in more detail, these include the Greater Norwich Energy Infrastructure Study<sup>73</sup> and the North Norfolk Power Study<sup>74</sup>.

Additionally all Local Plans across Norfolk will need to promote new developments which minimises energy use; minimise reliance on non-renewable or high-carbon energy sources and promote and encourage the use of decentralised and renewable or low-carbon energy sources and sustainable construction technologies ensure that investment decisions help promote growth and overcome constraints and there are forward looking decision on energy investment.

## 9.4 Water

Norfolk lies within one of the driest parts of the UK. Planned growth in housing and employment will significantly increase water demand. The area's large agricultural sector is also dependent on water availability in the summer. Water quality is crucial, due to the number of protected sites relying on high water quality, including the Broads.

Anglian Water supplies water to the majority of Norfolk County with parts of Great Yarmouth and the Broads Authority being served by Essex and Suffolk Water. Water companies have a statutory obligation to prepare and review Water Resource Management Plans (WRMP) once every 5 years setting how they will maintain a sustainable balance between water supplies and demand.

Anglian Water's Current Water Resources Management Plan (WRMP) was published in 2019 and runs to 2045<sup>75</sup>. This is currently under review in parallel to Water Resources East (WRE's) Regional Strategy. This demonstrates how sufficient water for future growth will be provided via a twin-track approach. Anglian Water will focus on the demand side first and reduce the amount of water used by installing smart meters, reducing leakage and investing in water efficiency. But they will also invest in the supply-side to increase the amount of water available. This includes investing in a series of interconnecting pipes to better join up their network and ensure they make best use of available resources before developing new ones. In the medium- to long-term, Anglian Water are likely to need additional resources. This could include winter storage, recirculation of recycled water, or

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<sup>73</sup> See [Greater Norwich Energy Infrastructure Study - https://gnlp.oc2.uk/docfiles/46/P3723%20Greater%20Norwich%20Energy%20Infrastructure%20Study%20with%20Appendices.pdf](https://gnlp.oc2.uk/docfiles/46/P3723%20Greater%20Norwich%20Energy%20Infrastructure%20Study%20with%20Appendices.pdf)

<sup>74</sup> See [North Norfolk Power Study - https://www.north-norfolk.gov.uk/media/5583/north-norfolk-power-study-report-march-2019.pdf](https://www.north-norfolk.gov.uk/media/5583/north-norfolk-power-study-report-march-2019.pdf)

<sup>75</sup> See [Water Resources Management Plan - https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf)



desalination. Anglian Water will be working with regional stakeholders and neighbouring water companies through Water Resources East (WRE) over the next two to three years to identify the best options to take forward to WRMP 2024. The measures undertaken by AW mean that water supply should not be a strategic constraint to development. Essex and Suffolk Water also have a WRMP<sup>76</sup> for the same period covering the areas of Norfolk they supply.

Norfolk Authorities will work with Water Resources East (WRE) and its members, including the two water companies, to help safeguard a sustainable supply of water for Eastern England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential.

In the period through to September 2023, WRE will develop a draft single, multi-sector Regional Plan for Eastern England, working with water companies, Local Authorities and Local Enterprise Partnerships, the energy and agricultural sectors, landowners and key environmental NGOs and through co-creation, engagement and collective decision making, the plan, and its subsequent iterations, will:

- Increase the level of resilience for water resources for all sectors and the environment.
- Deliver wider benefits in terms of flood risk, river flows and water quality.
- Ensure that water (either too much or not enough) is not a barrier to economic development in the region.
- Identify opportunities and delivery mechanisms to restore and enhance the environment, in line with the biodiversity net gain and wider aspirations of the 25 Year Environment Plan.
- Explore innovative funding and delivery models for water management solutions.
- Promote schemes which represent the best value for the region, seeking through collaboration to deliver more efficient solutions.
- Co-deliver the water related elements of other key regional strategies and plans,
- Focus on delivery of water-related climate change mitigation and adaptation strategies including net zero carbon ambition.
- Provide academically rigorous evidence to policy makers.

As part of WRE's work programme, with the support of councils, the Norfolk Strategic Fund have provided a grant to WRE for the development of a Water Management Strategy for the county. This project will develop short term water-related Covid-19 recovery interventions, the detailed Water Management Strategy and Plan and will establish a partnership structure known as a "Water Fund" to facilitate delivery of nature-based solutions for water management in the medium and long term. This project will be supported by a partnership of Norfolk County Council and [Water Resources East](#), the international environmental charity [The Nature Conservancy](#) (TNC) and Anglian Water.

Water Funds are governance and financing mechanisms allowing public and private sectors to work collectively to secure water for their communities. They are used successfully around the world to leverage blended finance streams to ensure coordinated delivery, funding and monitoring of nature-

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<sup>76</sup> See [Essex and Suffolk Water: Water Resources Management Plan -  
https://www.nwg.co.uk/globalassets/corporate/reports/esw-final-wrmp19.pdf](https://www.nwg.co.uk/globalassets/corporate/reports/esw-final-wrmp19.pdf)



based solutions (NBS) for water security. In 40 locations, across North America, Latin America, Asia and Africa, TNC collaborates with partners to set up Water Funds based on science-based plans and innovative tools for representing water management challenges, strong monitoring and mobilisation of diverse funding streams. This programme will establish TNC's first Water Fund in Europe. Being part of the global Water Fund network will access collective experience, accelerating the project, and enable Norfolk to be featured as a global exemplar for water resource management, thereby facilitating access to further financial and human resources.

The project will create a new multi-stakeholder governance structure which will include representatives from councils, New Anglia LEP, water companies, environmental organisations and the agri-food and energy sectors. This governance structure will be set up in 2 stages:

- a Water Management Board to generate consensus across all local actors for the preparation of a prioritised plan;
- a more permanent structure (a Water Fund) to: supervise and coordinate implementation of the plan, monitor results, enable mobilisation of funding and repayable financing from public and private sources

Progress with the project will be regularly reported to councils across the county.

**Agreement 21– Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.**

Other work is also ongoing across the county considering the wider impacts of water and associated infrastructure. Norwich City Council leads the River Wensum Strategy Partnership, working alongside the Environment Agency, Norfolk County Council, the Broads Authority and Norwich Society. The strategy has the overall vision of breathing new life into the river by enhancing it for the benefit of all and increasing access to, and making greater use of, this important asset. It will consider social, environmental and economic factors in achieving this vision. Some of the projects already delivered or planned as part of this strategy look to improve water quality and reduce flood risk on a catchment wide basis. In addition, the CATCH project, (Norfolk County Council along with Norwich City Council, Broadland District Council and Anglian Water) is working to find long-term solutions to the problem of surface water flooding in Norwich. The pilot project offers homes, businesses and schools the chance to have a slow-release water butts or rain water planters installed completely free of charge. The project is funded by Anglian Water and the Interreg European Union CATCH Climate Change and Flood Reduction Project. The EU are currently considering further phases of project work.

Local Plans can also contribute to long term water resilience by ensuring that new development incorporates water efficiency measures including the adoption of the optional higher water efficiency standard (110 litres/per person/per day).

**Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.**



Individual authorities may also wish to consider the inclusion of a specific water efficiency BREEAM standard for commercial development within their Local Plans. Improved water efficiency is not limited to measures within dwellings and commercial buildings and a collaborative approach to promote innovation in water efficiency/re-use is required working closely with water companies and site promoters/developers.

Anglian Water's aim is to see residential developers go beyond the optional higher water efficiency standard (110 litres/per person/per day) and in time to move to water neutrality as outlined in their Green Recovery Plan<sup>77</sup> this could include water re-use measures in new developments including stormwater and rainwater harvesting and grey water recycling forming part of an integrated approach to water management.

The disposal of waste water is addressed by Anglian Water's Water Recycling Long-Term Plan (WRLTP)<sup>78</sup> which highlights the investment needed over the next 25-years to balance the supply and demand for water recycling. The plan considers risk from growth, climate change, severe drought, and customer behaviours. It promotes sustainable solutions for maintaining reliable and affordable levels of service, and facilitates working in partnership to mitigate flood risk. Developing on the WRLTP Anglian Water are preparing a Drainage and Wastewater Management Plan with Stakeholders to be published in 2022<sup>79</sup> Anglian Water has also implemented new charging rules setting out a fixed, upfront schedule of fees that they charge for laying mains and pipes that connect new buildings and housing developments to their network<sup>80</sup>. This is a significant step towards ensuring that water companies provide an excellent service to developers of all sizes.

It will be necessary to take a co-ordinated approach to water through water cycle studies to address water supply, quality, waste water treatment and flood risk. Flood risk assessments should be used effectively to ensure development is located appropriately, to help achieve this a Strategic Flood Risk Assessment (SFRA) has been produced jointly by most Norfolk authorities<sup>81</sup>.

The release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from the new development to ensure that water quality is protected or improved, with no detriment to areas of environmental importance. Growth in several parts of the county is dependent on investment at sewage treatment works. The timing of these investments will have an important effect on the phasing of development.

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<sup>77</sup> See [Green Recovery Plan - https://www.anglianwater.co.uk/siteassets/household/about-us/green-recovery-five-point-plan.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/green-recovery-five-point-plan.pdf)

<sup>78</sup> See [Water recycling long term plan - https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-recycling-long-term-plan/](https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-recycling-long-term-plan/)

<sup>79</sup> See [Drainage and Wastewater Management Plan - https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-and-wastewater-management-plan/](https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-and-wastewater-management-plan/)

<sup>80</sup> See [DS charging arrangements - https://www.anglianwater.co.uk/siteassets/developers/development-services/ds-charging-arrangements-2019-2020.pdf](https://www.anglianwater.co.uk/siteassets/developers/development-services/ds-charging-arrangements-2019-2020.pdf)

<sup>81</sup> See [Strategic flood risk assessment - http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra](http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra)



**Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.**

In considering the distribution of growth Local Planning Authorities will need to ensure that distribution avoids cumulative detrimental impact on the most sensitive water courses particularly, those in the Broads and on the Wensum which cross a number of Local Planning Authority boundaries. Each public body will have regard to River Basin Management Plan<sup>82</sup> to ensure that their plans and actions do not risk delivery of the environmental objectives for each water body in the County (not just protected sites).

## **9.5 Digital Connectivity**

### **Broadband**

Having access to high-speed and reliable broadband is now regarded as essential by many residents and businesses. The picture regarding superfast broadband coverage is rapidly improving; 95% of the county's homes and businesses can now access superfast broadband, up from 42% in 2012<sup>83</sup>.

The Better Broadband for Norfolk (BBfN) project was launched in 2012, with the aim of ensuring that by the end of 2015 more than 80% of Norfolk's premises could access superfast broadband (24 Mbps download, also known as Next Generation Access (NGA)). The BBfN Programme signed a third contract during 2019; as a result a further £13 million will be invested to implement Fibre to the Premises for over 10,000 Norfolk properties that do not have access to Superfast broadband. As a result, by spring 2023, Superfast broadband coverage across Norfolk is expected to increase to 97%.

In order to extend the provision of superfast broadband further, additional funding would be needed. Where this is not possible or feasible, wireless (Wi-Fi) solutions can be investigated as well as satellite broadband, although it is recognised that there will be many parts of the county where these are not currently practicable.

In April 2016, changes to Building Regulations R1<sup>84</sup> were finalised. For applications made on or after 1 January 2017 new buildings are required to have physical infrastructure to support high-speed broadband (greater than 30Mbps). However, there is no requirement to provide external or site-wide infrastructure beyond the access point.

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<sup>82</sup> See [Anglian district river basin management plan - https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan](https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan)

<sup>83</sup> See [Local broadband Information Website - http://labs.thinkbroadband.com/local/index.php?area=E10000020](http://labs.thinkbroadband.com/local/index.php?area=E10000020)

<sup>84</sup> See [Building Regulations R1 - https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/517789/BR\\_PDF\\_AD\\_R\\_2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/517789/BR_PDF_AD_R_2016.pdf)



The availability of high-speed broadband is clearly of major strategic significance for Norfolk and Norfolk authorities welcome Openreach's offer to install Fibre to the Premises (FTTP) free of charge to all new housing developments of 20 or more homes and an improved pricing structure all the way down to two homes<sup>85</sup>. However the further rollout of broadband to existing homes cannot be required through any current Local Plan, but the Norfolk authorities are working closely with Better Broadband for Norfolk and other bodies and providers to ensure that high-speed broadband is delivered to more parts of the county as soon as is practicable.

Norfolk County Council in conjunction with all Norfolk districts, boroughs, Norwich city, the chamber of commerce, the LEP and other relevant regional groups has secured circa. £8 million in 2019 via the Government's Local Full Fibre Network programme and a further £2m in 2020 from Ministry of Housing, Communities and Local Government. This will provide Fibre to the Premises for over 400 public sector sites, and importantly also offers potential for nearby homes and businesses to access Full Fibre connectivity via a Government Gigabit Voucher Scheme.

The revised NPPF (para 112) highlights the importance of reliable communications infrastructure in economic growth and social well-being and requires policies to set out how high quality digital infrastructure is expected to be delivered, authorities will engage proactively with broadband and mobile network providers to better encourage the rollout of new infrastructure, particularly Openreach, and will seek to involve Openreach at the pre-application stage of major residential and commercial planning applications, as well as through consultations on the emerging Local Plans.

As part of the work to update this document a specialist group was set up to provide further guidance to local authorities on supporting broadband in local plans. Also, in March 2020 the Government published its response to the consultation<sup>86</sup> on: New Build Developments: delivering gigabit-capable **connections** which outlined Government's proposals to mandate gigabit-capable connections in all new build developments. Following publication of the response Government will:

- Amend the Building Regulations 2010 to require all new build developments to have the physical infrastructure to support gigabit-capable connections.
- Amend the Building Regulations 2010 to create a requirement on housing developers to work with network operators so that gigabit broadband is installed in new build developments, up to a cost cap.
- Publish supporting statutory guidance (Approved Documents) as soon as possible.
- Continue to work with network operators to ensure they are connecting as many new build developments as possible and at the lowest possible price.
- Work with housing developers and their representative bodies to raise awareness of these new requirements.

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<sup>85</sup> See [Fibre for developers rate card](https://www.openreach.com/content/dam/openreach/openreach-dam-files/images/fibre-broadband/fibre-for-developers/Rate%20card%20website.pdf) - <https://www.openreach.com/content/dam/openreach/openreach-dam-files/images/fibre-broadband/fibre-for-developers/Rate%20card%20website.pdf>

<sup>86</sup> [New Build Developments: delivering gigabit-capable connections response](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872990/New_Build_Developments_HMG_consultation_response.pdf) - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/872990/New\\_Build\\_Developments\\_HMG\\_consultation\\_response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872990/New_Build_Developments_HMG_consultation_response.pdf)



There are no further details on the timetable for the amended regulatory changes but in the meantime Local Planning Authorities can opt to encourage and support high speed broadband provision in new developments by incorporating objectives and policies to support Broadband in local plans and core strategies, as well as referencing the issue in pre-application discussions and adding it to planning application validation lists as a consideration. Local Planning authorities can also ensure they are able to support developers with information regarding the connection of Fibre to the Premises (FTTP) and discuss applications with the County Council to understand how their initiatives can help deliver high speed broadband provision to developments. Local planning authorities can implement Wayleave policies that only seek to cover costs and work with landowners to improve connectivity.

**Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high-speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.**

### **Mobile Connectivity**

Mobile telephone connectivity has, like broadband, become increasingly important. Significant change is now underway with the rollout of 5G services now having commenced in the County.

### **Coverage in Norfolk**

Interactive mapping (available from Consumer Group Which<sup>87</sup>) shows the general coverage for 2G, 3G 4G and 5G data across Norfolk. The majority of areas across Norfolk receive a weak 2/3/4G signal, with the strongest signals in Norwich and market towns such as King's Lynn and Great Yarmouth.

Norfolk County Council commissioned AWTG (Advanced Wireless Technology Group) to conduct an independent benchmark assessment of mobile coverage and user experience across Norfolk. The benchmarking campaign was conducted between February and March 2018 using a robust four-tier methodology to maximise the extent and breadth of data collection. This included Walk Testing at over 30 locations including museums, tourist attractions, camping and caravan sites, Rail Testing on all main rail routes in Norfolk, Drive Testing on over 5,500 kilometres of Trunk, A, B and C class roads across Norfolk and Stationary Testing at enterprise zones and 28 Norfolk Broads mooring points. The scope of the campaign covered a detailed assessment of the GSM (2G), UMTS (3G) and LTE (4G) radio network (coverage) performance and received signal strength of the four main mobile network operators in the UK. The results of this assessment can be found at [the Norfolk Mobile Coverage web page - www.norfolk.gov.uk/mobilemap](http://www.norfolk.gov.uk/mobilemap).

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<sup>87</sup> [Which mobile phone coverage map - http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map](http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map)



Nevertheless many mobile “not-spots” remain in Norfolk (some rural areas and parts of the coast in particular), particularly for 4G data coverage, the most significant improvements in rural coverage will be delivered through the Shared Rural Network (SRN) programme. This Programme will see the four main mobile operators and government jointly invest £1bn in improving mobile coverage in rural areas. The target is to deliver 4G coverage to 95% of the UK by 2025. The work started in 2020, initially with £500m investment from the four MNOs to share masts in areas where there is coverage already available from one or more MNO, but not all four. The next stage will entail a further £500m investment from government to fund coverage improvements in areas where there is no existing coverage. Through shared and new infrastructure, the Shared Rural Network is planned to increase the parts of the UK that get 4G coverage from all operators from 66% to 84%, improving consumer choice. The mobile operators expect the Shared Rural Network will extend mobile coverage to an additional 280,000 premises and for people in cars on an additional 16,000km of the UK’s roads, boosting productivity and investment in rural areas. Norfolk local authorities will continue to work proactively and collaboratively with the MNOs and their network build partners to improve mobile phone coverage including fast data services availability over 4G & 5G services.

## 5G

The next generation of mobile networks will be 5G which will probably encompass the following:

- 60-100 times faster than 4G Instantaneous playback from downloading speeds and
- Sufficient bandwidth to enable a multitude of internet-connected devices to communicate effectively.

5G uses higher frequency radio bands which travel less well than 4G, and can be disturbed by buildings, trees, weather etc. Whilst more base stations will be required Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which will be rolled out on existing infrastructure where possible. Getting high quality 5G infrastructure rolled out across Norfolk will be important to delivering the vision of the NSPF. The main benefit of 5G is that it could, in theory, provide ultra-high speed broadband access to all, without the bandwidth capacity challenges of 4G. This should enable location to be much less of a barrier to receiving broadband than previously, with benefits for homeowners and businesses. It could remove a barrier to location of employment opportunities, particularly home-based and rural-based businesses.

Norfolk authorities are currently working with Mobile UK and the mobile network operators to advance knowledge and plans to ensure that rural areas of Norfolk get 5G as early as possible.

On 22 July 2020 the Government published its response to the joint MHCLG and DCMS consultation published last year on proposed planning reforms to support the deployment of 5G and extend mobile coverage. This included the principle of amending permitted development rights for operators with rights under the Electronic Communications Code and the circumstances in which it would be appropriate to do so.

The government response summarises the submissions received and confirms its intention to take forward the in-principle proposals consulted on. This will be subject to a technical consultation with representatives from both the local planning authority and mobile industry sector, on the detail of the proposals, including for appropriate environmental protections and other safeguards to mitigate the impact of new mobile infrastructure.

This will be undertaken prior to amending Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to enable:



- the deployment of taller and wider masts;
- building-based masts located nearer to highways; and
- faster deployment of radio equipment housing, such as equipment cabinets.

The key conclusion is that some consistency of approach from all Norfolk Planning Authorities is clearly important for 5G if the very high degree of nationwide coverage required for 5G to be effective is to be secured. Broadly, it should be made as straightforward as possible for 5G base stations and transmitters to be approved where they fall outside of the remit of permitted development, and common development management policy text to facilitate this should be explored, taking into account material planning considerations. In particular, care will need to be taken to ensure that new telecommunications equipment is sited and located sensitively in respect of the public realm, street-scene, historic environment and wider landscapes.

As part of the work to update this document a specialist group was set up to provide further guidance to local authorities on supporting the roll out of 5G. The group have produced a supporting document of Shared Objectives for extending 4G coverage and the rollout of 5G infrastructure in the County of Norfolk.

**Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.**



## 9.6 Education

### Education

Norfolk's School Capacity return to the DfE (SCAP) indicates that Norfolk's school population will begin to stabilise over the next 10 years. The larger cohorts experienced at primary school are now moving through to secondary indicating a rise in secondary numbers over the next 10 years but a drop in primary school numbers. Calculating a 10 year forecast for primary school numbers does come with certain caveats. The calculations are based on the past 3 years of children born, and therefore only produce three years of predicted future data. The 3 years from 2020 are smaller year groups than those from 5 years ago which may explain the predicted drop in primary school numbers.

Primary age population including the influence of housing planned will drop by around 7.2% and secondary will rise by 4.2% (children currently in the school system including the additional 4% covered by growth). The impact of housing included in these figures is based purely on housing with full planning permission and some areas of the County have significant growth planned. Once these new homes come forward the figures are likely to change.

Previously reported increases in the school population at reception age are changing but numbers have been stable over the past 3 years at around 9000 per year group. Secondary school numbers at year 7 are increasing with the higher year groups currently in primary moving through to secondary. The speed of delivering houses is key to the requirements of school places so careful monitoring of housing progress is undertaken between County Council/District/Borough Councils.

Standards in Norfolk schools have risen considerably over the past 5 years with 83% of schools being graded Good or Outstanding in 2020 compared with 68% 7 years ago – data as at September 2020. The Local Authority retains responsibility for ensuring that there is a sufficient supply of school places and works with a range of partners, e.g. Dioceses and Academy Trusts to develop local schemes.

Norfolk County Council's School Growth and Investment Plan, published every January identifies three growth areas requiring more than one new primary phase school and a further 10 areas requiring one new school. Expansion to existing schools will also be required in some areas of the County. A new High School for north east Norwich is also being discussed and planned.

Our strategic priorities were agreed by NCC Cabinet in February 2020 to guide the work with local partners and any proposals for investment in the education infrastructure. Norfolk County Council works closely with Local Planning authorities as per agreement 21.

**Agreement 26: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.**



## 9.7 Transportation

There will be a need for considerable further investment in transport infrastructure if this is not to constrain growth. A background paper was previously produced summarising the state of the County's transport network, providing much of the evidence base for the production of the first version of the NSPF and subsequent Local Plans<sup>88</sup>. The paper aims to identify: the current state of the transport system; the constraints (current and future); and opportunities and includes a review of transport constraints to identify issues that, without resolution, may prove a barrier to growth. The information is now being updated via the Norfolk Strategic Infrastructure Delivery Plan as mentioned in Section 9.1.

### Current Network

Norfolk is served by two trunk roads: the A11 from London and Cambridge, and the A47 from the west. The A47 continues from Great Yarmouth to Lowestoft. The A11 is fully dual carriageway and the corridor will see some of the largest scale growth planned in the county (at Thetford, Attleborough, Wymondham, Hethersett and the Norwich fringe at Colney/Cringleford). The A47 is a mix of single and dual carriageway, both within and beyond Norfolk.

Away from the strategic road network, Norfolk's road network is a largely rural, single carriageway network. Much of it has not seen significant improvement schemes and so journey times can be slow, particularly away from the higher standard A-class network.

The following projects have successfully been funded since 2013

#### Completed:

- Broadland Northway (Norwich Northern Distributor Road (inc Postwick)) - £205m
- Norwich Pedal ways - £14m
- Great Yarmouth Beacon Park Link (A47/143 Link) - £6.8m
- A11 dualling Barton Mills to Thetford- £105m
- Great Yarmouth Right Turn at the rail station - £400,000
- Great Yarmouth Rail Station to the Market Place improvement- £2m
- Great Yarmouth sustainable transport package (Part 1) - £2.5m
- Thetford Enterprise Park Roundabout- £1.5m King's Lynn Lynnsport Link Road- £3.5m
- A140 Hempsall Roundabout - £4m
- A11/Outer Ring Road Daniels Road junction improvement- £2m
- Great Yarmouth congestion-busting projects- £3.3m
- Norwich (various projects including Dereham Road roundabout- £2m, Cycle link extension to Wymondham- £1.3m, City centre Prince of Wales Road- £2.6m, Dereham Road widening- £3m)

#### Under construction or part-completed:

- Attleborough Town Centre Improvements - £4.5m
- Great Yarmouth sustainable transport package (Part 2) - £3.5m

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<sup>88</sup> See [NSPF Supporting Transport Information - https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting\\_documents/NSFTTransport\\_OutputV4.docx](https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/NSFTTransport_OutputV4.docx)



### Planned, not yet started:

- Great Yarmouth Third River Crossing- £120m
- A47 improvements £2-300m (incl Thickthorn and Great Yarmouth junction improvements and dualling Blofield to North Burlingham, and Easton to North Tuddenham)

Norfolk County Council, in partnership with Norwich City Council, Broadland District Council and South Norfolk Council, has made an application to the Department for Transport (DfT) as part of the Transforming Cities Fund. The fund aims to make it easier for people to access jobs, training and retail, and also aims to respond to issues around air quality. In September 2018, Greater Norwich was one of 10 city areas shortlisted to apply for a share of the £840m grant. In September 2020 the DfT confirmed that Norfolk County Council will receive £32 million from the Transforming Cities Fund with a further £27m from bus operator First Eastern Counties, local councils and private contributions<sup>89</sup>.

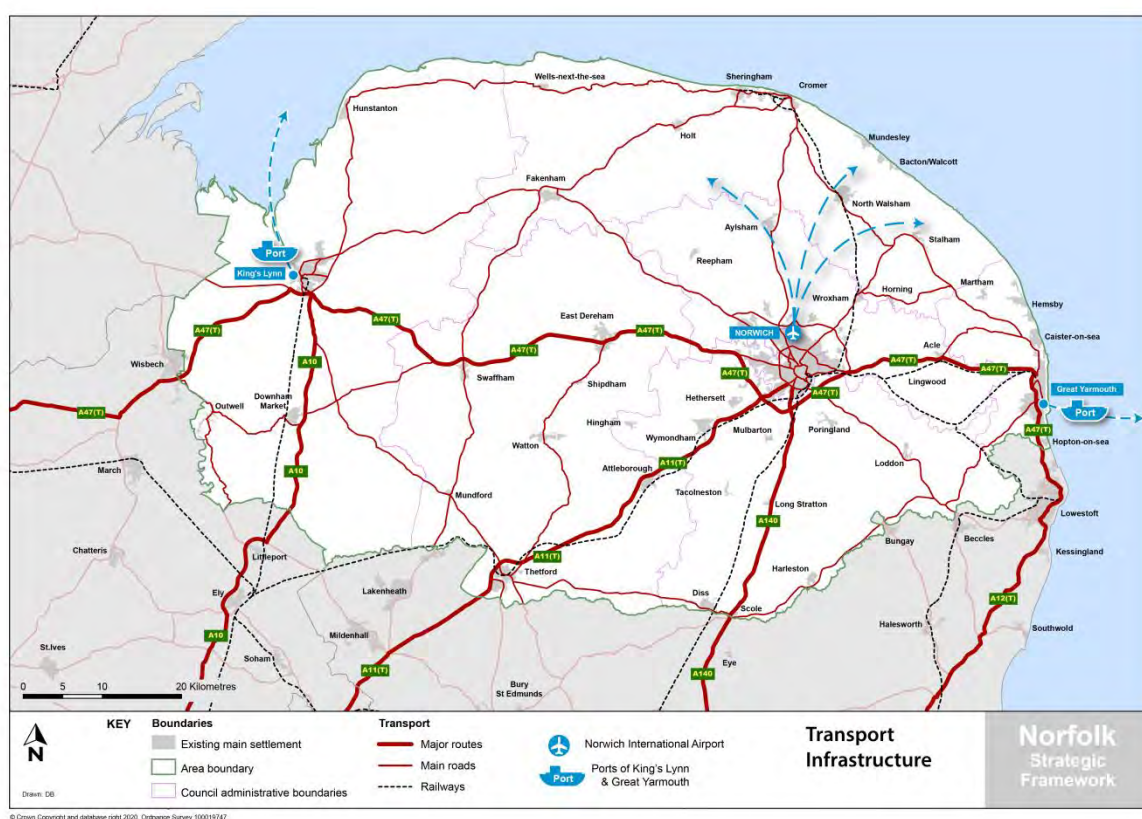


Figure 9: Norfolk Transport Infrastructure, 2021

Norwich Airport is situated some 5km north of Norwich city centre. It operates a number of scheduled and charter flights and provides servicing for the offshore energy industries via helicopter flights. The airport terminal has capacity for 700,000 passengers per year. In 2017 the airport published its draft masterplan setting out a vision for the airport's continued growth over the next

<sup>89</sup>See [Councils secure £59 million for sustainable transport - https://www.norfolk.gov.uk/news/2020/09/councils-secure-59-million-for-sustainable-transport](https://www.norfolk.gov.uk/news/2020/09/councils-secure-59-million-for-sustainable-transport)



30 years. The masterplan has been adopted and endorsed by Norwich City Council subject to production of a surface access strategy. Continued endorsement is subject to the surface access strategy being produced however this has been delayed due to covid-19.<sup>90</sup> The Coronavirus has had a significant impact on air travel however the long term impacts remains unclear, the relevant Local Authorities will work with the airport to support any recovery plans once these are understood.

Great Yarmouth is the largest port in the county. It is a modern, multipurpose facility with 24/7 unrestricted operations, integrating a well-established river port with a fully operational deep water outer harbour with more than 1 km of quayside, accepting vessels up to 220 metres in length and up to 10.5 metres draught at all states of tide.

Levels of both walking and cycling to work are relatively high in Norwich. In South Norfolk and Broadland Districts levels of walking are comparatively lower than elsewhere in the county, probably reflecting that many people from these districts work in Norwich and many parts of these districts are too far from Norwich to walk. A comprehensive cycle network has been identified in Norwich, and the city has also benefited from a large amount of funding that has been used to upgrade parts of the cycle network. There is still however a considerable amount of work required to upgrade the network in its entirety.

Accessibility by public transport to services and facilities is problematic in some more rural and isolated parts of Norfolk. Overall, accessibility tends to be poorest in the more rural districts of Breckland and West Norfolk, where there is a significant number of smaller villages, hamlets and isolated dwellings. Providing bus services within these smaller settlements is often unviable due to low population numbers.

Tables below lists some of the key road projects that the County Council in collaboration with partners is seeking to progress in the next 10 years.

**Table 12: Key Infrastructure Road Projects in Local Authority Control**

<b>Project Name</b>	<b>Estimated Start date</b>	<b>Estimated Cost</b>	<b>Funding sources</b>
<b>Broadland Growth Triangle Link Road</b>	2023	£38m	Developer funding, CIL, BRP, HIF
<b>A140 Long Stratton Bypass</b>	2023	£37.5m	Developer funding, NALEP, CIL, NPIF, Government Major Road Network
<b>A10 West Winch Housing Access Road</b>	2024	£30-50m	Developer funding, DfT Major Road Network
<b>A148 Fakenham Roundabout Enhancement</b>	2022	£3.5m	NPIF, NALEP
<b>Attleborough Link Road</b>	TBC	£18m	BRP, developer finance, NALEP, Homes England loan, HIF
<b>Norwich Western Link (A47 to NDR)</b>	2023	Indicative £160m	NALEP, Local Major Transport Scheme

<sup>90</sup> See [Norwich Airport Masterplan - http://www.norwichairport.co.uk/masterplan/](http://www.norwichairport.co.uk/masterplan/)



**Table 13: Priority Road Projects for delivery by other organisations**

<b>Project Name</b>	<b>Estimated Start date</b>	<b>Estimated Cost</b>	<b>Likely funding sources</b>
<b>A11 Thetford bypass junctions</b>	2020-2025	Not Known	NPIF, Highways England Roads Investment Strategy 3 (2025-2030), Major Road Network Funding
<b>A47 Wisbech Bypass Junctions</b>	2020	Not Known	NPIF, developer funding, Highways England Roads Investment Strategy 2 (2020-2025), CPCA Business Board Growth Deal Funding
<b>A47 Acle Straight dualling</b>	2025-2030	£79m	Highways England Roads Investment Strategy 3 (2025-2030)
<b>A47 Tilney to East Winch Dualling</b>	2025-2030	£130m	Highways England Roads Investment Strategy 3 (2025-2030)

Timely delivery of the above list of commitments will doubtless serve to stimulate the local economy and enhance the prospects of delivery of planned growth. Whilst the growing recognition of the need for further development of Norfolk's infrastructure is very welcome because of its contribution to the delivery of the objectives of the NSPF there remains a considerable need for further infrastructure investment in the County if the vision in this framework is to be realised.

Furthermore, the background paper previously produced identified three key strategic issues affecting the County including: the relatively poor transport connectivity between our main settlements and destinations outside Norfolk resulting in long journey times; the poor connectivity within the County particularly for east-west journeys, exacerbated by congestion and unreliable journey times on parts of the network (especially the A47) adding to business costs; and difficulties in delivering major enhancements to transport networks within our urban areas and market towns which tend to have historical street patterns where the scope for major improvements is limited.

It should also be noted that the area of transport is considered to be an area where new technology may have a particularly significant impact during the duration of this framework and this makes predicting the full range of enhancements to travel networks difficult at this stage.

It is clear that providing suitable transport provision to meet the needs of existing and future populations while reducing travel need and impact will be one of the greatest challenges faced by Norfolk in delivering the level of growth that is anticipated over the coming decades. Given the overall scale of growth that is planned across the County a key matter will be ensuring that transport is a significant consideration in locating this growth and development levels are maximised in areas that are best served by transport networks and have the greatest potential for promoting the use of non-car based modes.



## Rail

Norfolk has a limited rail network, meaning that many of its towns are not served by rail. Also, the services offered provide a very limited range of destinations and frequencies. In particular, services to the Midlands and Home Counties are poor. Whilst rail generally provides faster journeys to other major centres compared to road, average rail speeds compare poorly with connections between major centres out of the County.

There are two lines from London: the Great Eastern Main Line from London Liverpool Street via Ipswich to Norwich; and the Fensline / Great Northern Route from London King's Cross via Cambridge to King's Lynn. (King's Lynn also has one train per day to London Liverpool Street). Norwich is directly connected to Cambridge, Great Yarmouth, Lowestoft and Sheringham; and longer distance services to Liverpool via Peterborough.

The tables below set out some key shared priority schemes for rail improvement that the authorities will work together to promote for funding. These include Norwich in 90 which requires track improvements including the Trowse swing bridge, Haughley Junction, loops in Essex and level crossing upgrades. Also a large number of rail services pass through Ely. Major rail infrastructure improvements are required to accommodate all services committed within franchise agreements and for further frequency improvements in the future. Local authorities are working with local enterprise partnerships, government and Network Rail to bring forward the improvements for delivery in the next round of rail spending, between 2019 and 2024, known as Control Period 6.

**Table 14: Priority Rail Projects for promotion**

<b>Project Name</b>	<b>Estimated Start date</b>	<b>Estimated Cost</b>	<b>Likely funding sources</b>
<b>Norwich to London rail (Norwich in 90)</b>	2019-2024	Being evaluated	Network Rail Control Period 6
<b>Great Yarmouth Rail Station</b>	2019-2024	TBC	Network Rail Control Period 6
<b>Ely area enhancements</b>	Mid 2020's	TBC	Network Rail Control Period 6, NALP
<b>Broadland Business Park station</b>	Mid 2020s	£6.5 million	Growth Deal, Rail Industry
<b>East West Rail (Cambridge to Oxford)</b>	Late 2020s	Not Known	Government via special purpose delivery vehicle



## 9.8 Coastal and Marine Planning

The Norfolk coast is of recreational, environmental, economic and cultural importance but it is also home to industry (energy, ports and logistics, digital, food and drink and creative sector), agriculture and tourism.

### Coastal Partnership East

Officially launched on 10th June 2016, Coastal Partnership East brings together the coastal management expertise from three local authorities (Great Yarmouth Borough Council, North Norfolk District Council, and East Suffolk Council) these face significant, diverse but also common challenges of a dynamic coastline.

Coastal Partnership East is responsible for 92km of the 173km of coastline in Norfolk and Suffolk, from Holkham in North Norfolk to Landguard Point in Felixstowe. There are approximately 352,000 people who live in the direct coastal zone and many more that work on and visit our coast.

### Shoreline Management Plans

The East Anglia Coastal Group's role is to influence and support members to manage the coast for the benefit of the Anglian Region, this role includes supporting the Shoreline Management Plans Process. Shoreline Management Plans (SMPs) are non-statutory plans for coastal defence management planning prepared by the Environment Agency. The aim of an SMP is to provide a strategy for managing flood and erosion risk for a particular stretch of coastline, they provide a large-scale assessment of the risks associated with coastal processes and helps reduce these risks to people and the developed, historic and natural environments.

The SMPs provide estimates of how the coast is likely to change over the next 100 years, taking into account the future implementation of coastal policies, geology, likely impacts of climate change and the existing condition of the coast including coastal defences.

Three Shoreline Management Plans are active along the Norfolk coastal frontage:

- SMP4 the Wash Shoreline Management Plan covers approximately 110 km of coast from Gibraltar Point to Old Hunstanton.
- SMP5 which incorporates the coast to the west of Kelling Hard.
- SMP6 which incorporates the coast to the east of Kelling Hard to Lowestoft Ness.

Shoreline Management Plans exist around all of the coastline of England and Wales.

### Marine Plans

The East Inshore and East Offshore Marine Plans have been prepared by the Marine Management Organisation (MMO) and were adopted in April 2014. The East Inshore Marine Plan area includes the coastline stretching from Flamborough Head to Felixstowe, extending from mean high water out to 12 nautical miles, including inland areas such as the Broads and other waters subject to tidal influence, and covers an area of 6,000 square kilometres. The East Offshore Marine Plan area covers the marine area from 12 nautical miles out to the maritime borders with the Netherlands, Belgium and France, a total of approximately 49,000 square kilometres of sea.

The aim of marine plans is to help ensure the sustainable development of the marine area. Marine plans will contribute to economic growth in a way that benefits society whilst respecting the needs of local communities and protecting the marine ecosystem. They will help to reduce the net regulatory burden on applicants and users by acting as an enabling mechanism for those seeking to undertake activities or development in the future and providing more certainty about where



activities could best take place. The MMO is responsible for preparing marine plans for the English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. For Norfolk The East Inshore Marine Plan area extends up to Norwich on the River Yare, as well as to Wroxham on the River Bure, and to near Ellingham on the River Waveney and in West Norfolk the River Great Ouse and River Nene are tidal and so the East Inshore Marine Plan area, extends beyond the Borough boundary almost to Peterborough on the Nene and just beyond Earith on the Great Ouse.

The MMO are consulted as part of the local plan process for authorities with coastal borders or where tidal rivers are part of their area. The MMO are also involved with a range of local coastal groups and strategies.

**Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues:**

- Infrastructure
- Governance
- Heritage
- Marine Protected areas
- Marine and coastal employment
- Sustainable port development
- Energy – offshore wind and oil and gas
- Access for tourism and recreation
- Sustainable fisheries and aquaculture in small harbour towns
- AONB and Seascape and landscape (character and natural beauty)
- Biodiversity
- Marine aggregates
- Cabling
- Water quality/water supply and sewerage
- Climate change/ Coastal erosion and coastal change management



## 9.9 Flood Management and Green Infrastructure

### Flood Management

Flood risk is an important issue for Norfolk. Significant parts of the County are vulnerable to tidal, fluvial or surface water flooding from extreme weather events. Such events can pose a significant risk to life as well as property. The three main settlements in the County which all developed in their locations due in part to their access to tidal waters can all be impacted by flooding.

Much of the Norfolk coastline is reliant on flood defences to reduce flood risk to existing development. Considerable further information on the planned interventions that are necessary in order to protect our communities from coastal flooding are set out in the NSIDP. In addition to that an interactive Environment Agency Map can be accessed at [the EA web page - https://environment.data.gov.uk/asset-management/index.html](https://environment.data.gov.uk/asset-management/index.html) which details managed flood risk assets and planned capital schemes. UK Government studies have concluded that climate change over the next 100 years is likely to result in hotter, drier summers and warmer, wetter winters, with more extreme weather events including droughts, floods and sea level rise increasing the level of risk from flooding that is faced by communities in Norfolk.

To address these strategic issues it will be necessary to take a co-ordinated and proportionate approach to managing flood risk including the opportunities not only for mitigation but also adaptation. Flood risk assessments are to be used effectively to ensure development is located appropriately and away from areas of flood risk wherever possible. Developers will need to work closely with the relevant risk management authorities in minimising flood risk from all sources through a combination of high quality urban design, natural flood risk management including green infrastructure, as well as use of Sustainable Drainage Systems (SUDs) which can provide multi-functional benefits not limited to flood risk and can form part of an integrated approach to water management with water re-use measures forming part of the overall design of developments. Early engagement with the relevant risk management authorities is required prior to the submission of some planning applications. Anglian Water's Water Smart Communities<sup>91</sup> combine different elements of water management together with town planning and design to deliver multiple benefits for communities and the environment. They use a more holistic and integrated approach to urban water management, with the aim to:

- Enhance liveability by contributing to green streetscapes and high quality open space
- Promote sustainable use of water resources and infrastructure to enable growth
- Build resilience against the potential impacts of climate change and extreme weather events
- Contribute to natural capital and biodiversity through multi-functional water features
- Deliver water efficient homes to reduce household bills and support affordability

Anglian Water together with the LLFAs (including Norfolk County Council) have also created a Water Management Checklist<sup>92</sup> for Local Plan policies.

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<sup>91</sup> See [Water smart Communities - https://prod-swd.anglianwater.co.uk/siteassets/household/about-us/aws-water-smart-communities---flyer.pdf](https://prod-swd.anglianwater.co.uk/siteassets/household/about-us/aws-water-smart-communities---flyer.pdf)

<sup>92</sup> See [AW water management checklist - https://www.anglianwater.co.uk/siteassets/household/about-us/water-management-checklist-for-local-policies.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/water-management-checklist-for-local-policies.pdf)



Further guidance on how this will be done is available on the County Council website in its role as the Lead Local Flood Authority for the County<sup>93</sup>. The Government has also set out the National Flood and Coastal Erosion Risk Management Strategy for England<sup>94</sup>. This strategy's long-term vision is for a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100. It has 3 long-term ambitions, underpinned by evidence about future risk and investment needs. They are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action

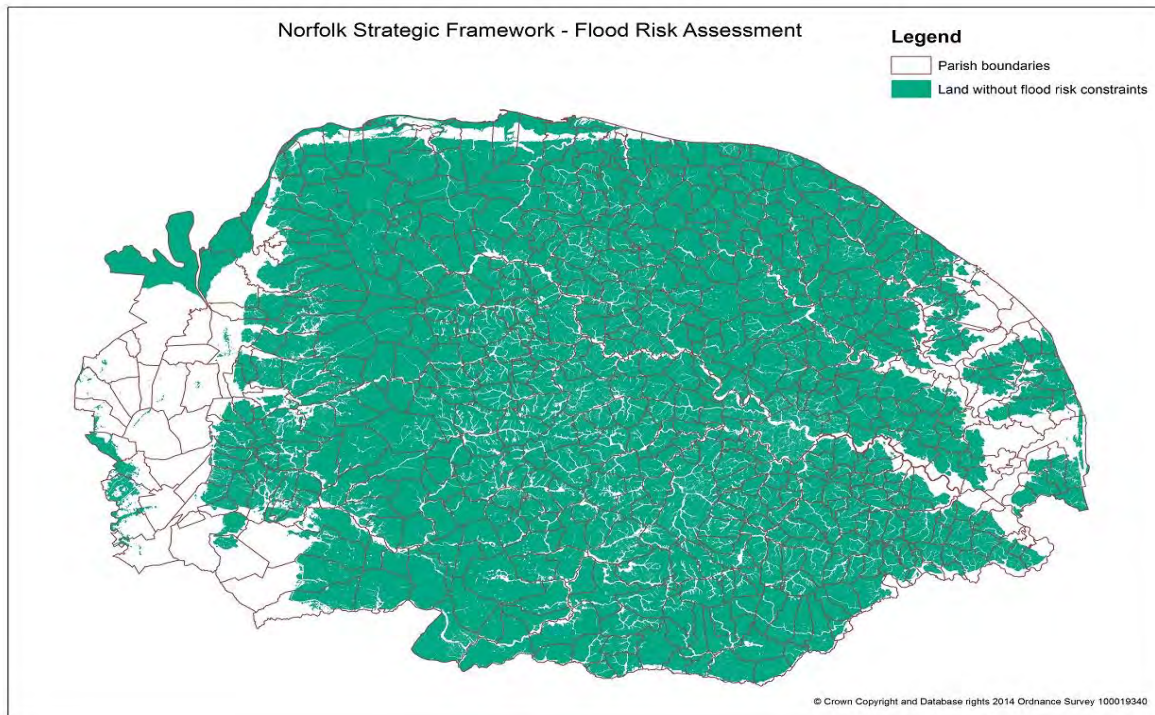
The Local Flood Risk Management Strategy (LFRMS) for Norfolk must be consistent with the National FCERM Strategy. The LFRMS is in the process of being updated to include policies for zero emissions and environmental net gain in local flood risk activities and supporting communities to be more flood resilient.

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<sup>93</sup> See in particular [Lead Local Flood Authority Information - https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf](https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf)

<sup>94</sup> See [National Flood and Coastal Erosion Risk Management Strategy for England - https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2](https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2)





**Figure 10: Norfolk Flood Risk Map. 2016**

Figure 10 provides an illustration, at a broad scale, of the extent of land with and without flood risk constraints from rivers and the sea in Norfolk. Whilst it is clear that significant areas of the County are free from flood risk constraint it should be noted that many of the currently developed urban areas are at some risk of flooding. It will be important to ensure that a pragmatic approach is taken to new development and consideration of on-site and off-site flood risk. If planned correctly and measures for betterment are agreed and implemented, new development can significantly reduce the flood risk faced by existing communities in these areas.

As flood waters do not respect administrative boundaries there will be a need for the Norfolk Planning Authorities to continue to work closely together on assessing and minimising flood risk as well as on responding to emergencies when they do occur. For example, the Broadland Futures Initiative is a strategic project to explore how best to manage flood risk in the inter-related areas of the Norfolk and Suffolk Broads, the coast between Eccles and Winterton (which protects the Northern Broads) and the entrance to the Broads system through Great Yarmouth. The project will guide decision making over the short, medium and long term.

A number of significant investments have recently been made or are planned in the near future to help alleviate flood risk, this includes the completion on the £19.3m Bacton Walcott Sandscaping scheme. Further projects are detailed in Local Plans, coastal management plans and strategic flood risk assessments and included in the county wide NSIDP.



**Table 15: Priority Strategic Flood Defence Projects for Promotion**

<b>Project Name</b>	<b>Estimated Start date</b>	<b>Estimated Cost</b>	<b>Likely funding sources</b>
<b>Great Yarmouth Tidal Defences (Epoch 2)</b>	Commenced Oct 2019	£40.3 million	NALEP, Local Authorities and Private Sector
<b>Great Yarmouth Tidal Defences (Epoch 3)</b>	mid 2023	£29.5 million	NALEP, Local Authorities and Private Sector
<b>Future Fens – Flood Risk Management</b>	2030	Phase 2 £10-15m	Central Government, Local Government, Internal Drainage Boards and other funding sources from beneficiaries.

### **Green Infrastructure and the Environment**

Green infrastructure (GI)<sup>95</sup> is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of economic, environmental and quality of life benefits for local communities. The provision of green infrastructure in and around urban areas helps create high quality places where people want to live and work. New GI can also mitigate impacts on existing sensitive sites and support heritage and conserve the historic environment. Access is an integral part of GI and PROW and 'Norfolk Trails' are an important asset.

The area has a wealth of environmental assets ranging from international and national status, to those of local importance. These must be safeguarded and enhanced for the benefit of current and future generations. Many of Norfolk's natural habitats have been lost and fragmented with once extensive areas of habitats reduced to small remnants isolated from each other and surrounded by relatively inhospitable land uses, reducing biodiversity and increasing vulnerability.

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<sup>95</sup> [The definition of GI is set out in the Natural England document GI Guidance -   
http://publications.naturalengland.org.uk/file/94026](http://publications.naturalengland.org.uk/file/94026) , in terms of the NSPF it includes 'blue infrastructure' ie water environments - rivers, lakes, ponds etc.



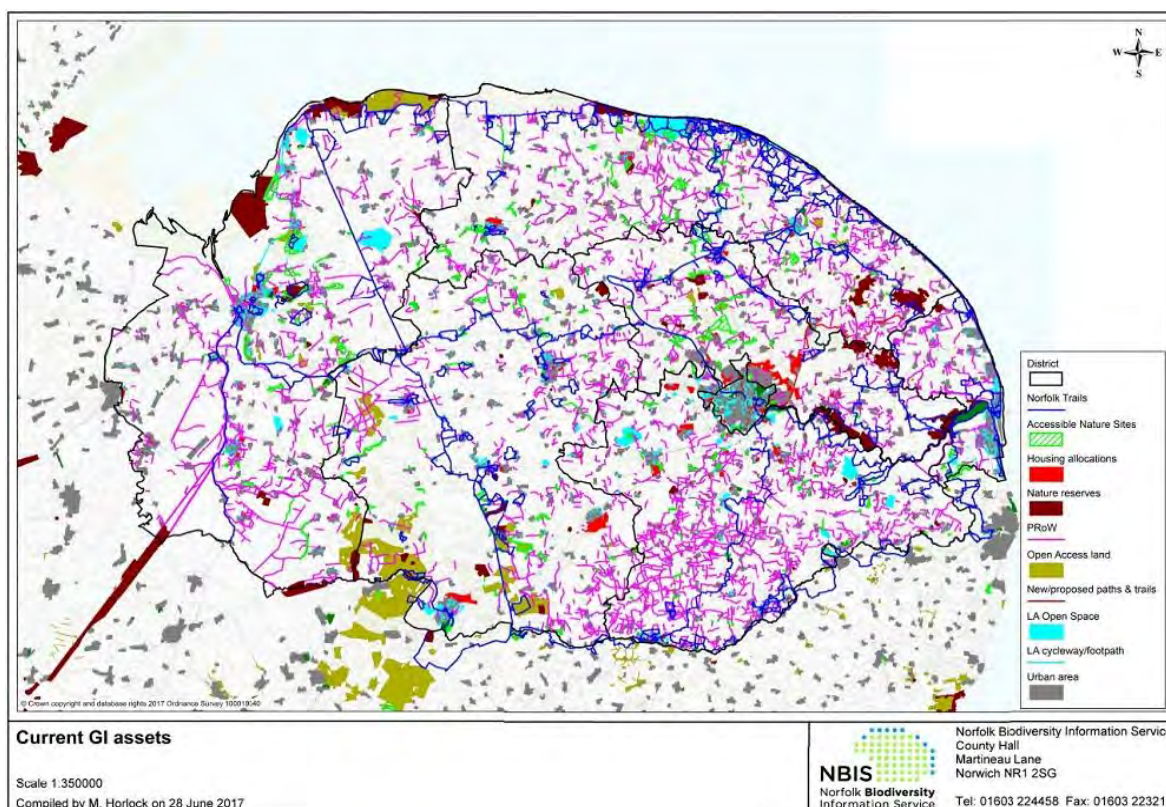


Figure 11: Norfolk's current GI assets. 2017

Current GI assets are set out in Figure 11<sup>96</sup>. Green infrastructure should be provided as an integral part of all new development, where appropriate, alongside other infrastructure such as utilities and transport networks.

Planning for green infrastructure should occur at the evidence gathering (survey and analysis) stage of the planning process, so that green infrastructure responds to character and place, and that standards are set for green infrastructure accessibility, quantity and quality. Early integration of green infrastructure can also ensure that it is properly planned in advance of development or delivered alongside development on a phased basis. In this way green infrastructure can be planned as an integral part of the community. (Natural England Green infrastructure guidance, P43)

With the anticipated introduction of the Environment Bill in January 2021, legally binding targets for Biodiversity Net Gain and Local Nature Recovery Networks will support the vision of the 25 year Environment Plan and the GI Network work will form an important foundation for this.

<sup>96</sup> Further more detailed maps are available from the NBIS website see <http://www.nbis.org.uk/sites/default/files/documents/Maps.zip>



As Norfolk grows and changes in terms of its demographic profile considerable investment in the provision and maintenance of a GI network will be needed in order to facilitate and support growth whilst also:

- Minimising the contributions to climate change and addressing their impact;
- Protecting, managing and enhancing the natural, built and historical environment, including landscapes, natural resources and areas of natural habitat or nature conservation value;
- Creating more or restoring lost wildlife rich habitat outside protected site networks to reverse the loss of biodiversity
- Ensuring existing and new residents many of whom may be elderly receive the health and quality of life benefits of good green infrastructure and are able to access appropriate recreational opportunities;
- Maintaining the economic benefits of a high quality environment for tourism; and
- Protecting and maintaining the Wensum, Coast, Brecks and the Broads.

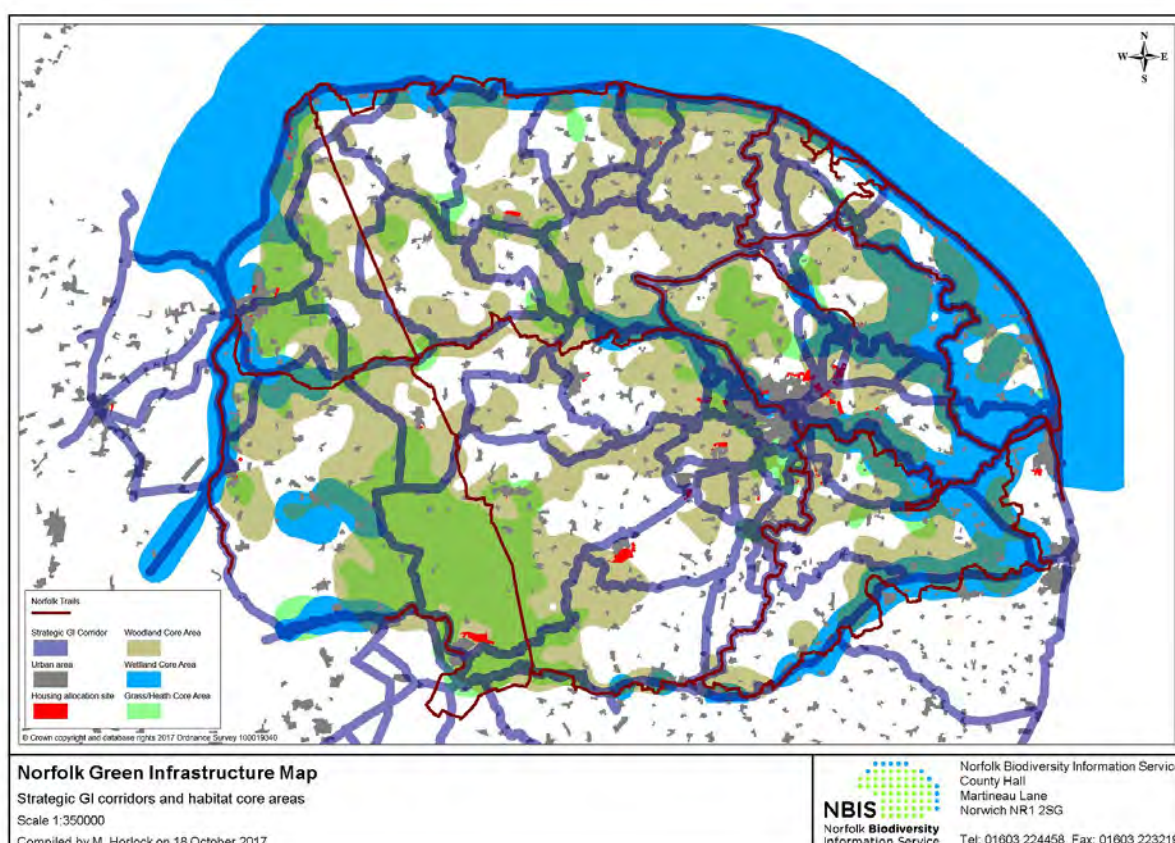


Figure 12: Norfolk's GI corridors. 2017

Figure 12 shows the identified potential Green Infrastructure Corridors. The intention is for this map to inform Local Plans, and also local GI Strategies. It should be noted that depending on the nature of corridor they may not constrain development, indeed in some circumstances promoting growth in these corridors may enhance their GI value.

One of the strategic aims for the Environment section is to not only 'protect, maintain and enhance biodiversity' but also to restore and create habitats which support biodiversity. New growth in



Norfolk must respect this aim, but the use of green infrastructure either existing or new can greatly aid the assimilation of new development.

A commissioned report by Footprint Ecology on the impact of recreational pressures on Natura 2000 protected sites e.g. North Norfolk Coast, The Broads and the Brecks, likely to arise from new housing growth gave insights into the scale and location of that pressure. This is a complex area, many of the Natura 2000 sites attract large numbers of visitors, acting as green infrastructure, but are sensitive environments with specific legislative requirements.

As part of producing this Framework the authorities are working to produce, in collaboration with the Environment Agency, Natural England, Wild Anglia, Forestry Commission and other local partners, the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy. This is an action plan which looks to address the recreational pressures on Natura 2000 protected sites in a coordinated way and therefore helps address requirements arising from Habitat Regulations Assessments from respective Local Plans. The Strategy includes:

- A Recreational Impact Avoidance and Mitigation Strategy (RAMs) - a County Wide programme of mitigation measures to avoid adverse effects on protected habitat sites from the in-combination recreational impacts from new residential development. The cost of measures is proposed to be funded by a tariff on new residential development.
- Identification of GI opportunities which aims to divert visitors from sensitive habitat sites

**Agreement 28: In recognition of:**

**a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;**

**b) the pressure that development in Norfolk could place on these assets; and**

**c) the importance of ecological connections between habitats**

**Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.**

With regard to the emerging priority projects for short term effort to bring forward, the following feature within the SNIDP.

**Table 16: Priority Green Infrastructure Projects for Promotion**

<b>Project Name</b>	<b>Estimated Start date</b>	<b>Estimated Cost</b>	<b>Likely funding sources</b>
<b>The Green Loop (Walking/cycling route linking Norwich – Aylsham – Hoveton –NE Growth Triangle)</b>	Not Known	£5.7m	S106, CIL, DfT, NALEP, Interreg Experience-secured
<b>Weavers Way</b>	2023	£3.1m	RDPE,HLF,NALEP
<b>North West Woodlands Country Park</b>	Ongoing	£2m	BDC, CIL, BRP
<b>Burlingham Country Park</b>	2021	TBC	CIL, BRP, NCC, Developer Funding



## 9.10 Minerals and Waste

### Minerals

Carstone is a type of sandstone that is quarried in west Norfolk. It has traditionally been used as a vernacular building material, although it is no longer used to any significant degree. Although it is classed as a 'hard rock' it is not used as a hard rock (e.g. road dressing), instead it is used primarily as fill (to raise the levels of land prior to construction) or in the formation of embankments. Therefore it is often used in the construction of roads.

Carstone deposits are located in very limited areas of west Norfolk. In 2019 there were two carstone extraction sites in Norfolk, located at Middleton and Snettisham.

Carstone production in Norfolk was 39,878 tonnes in 2019. The 10 year rolling average of carstone sales was 75,380 tonnes in the period 2010-2019. The 3 year rolling average of carstone sales was 81,245 tonnes in the period 2017-2019. The permitted reserves for carstone extraction sites in Norfolk were 1.72 million tonnes at the end of 2019. Based on the 10 year sales average, at the end of 2019 there was a carstone landbank of permitted reserves of over 22 years.

Silica sand deposits are located in very limited areas of west Norfolk, a relatively narrow band which runs north to south just to the east of King's Lynn. The northern extent of the silica sand resource is at Heacham, and the southern extent around Hilgay. In Norfolk the silica sand resource is split into two broad categories, the Mintlyn Beds and the Leziate Beds; historically the Leziate Beds have been used principally for glass sand and the Mintlyn Beds for the production of foundry sand. Processing of sand for foundry use has stopped at Leziate and those parts of the process plant dedicated to their production have been removed. This reflects a general decline in the demand for foundry sand in England.

The deposit which is being worked at Leziate is one of two in England where silica sand of sufficient purity and grade for the manufacture of colourless flint (container) and float (window) glass is extracted. The other extraction site of silica sand of comparable quality is in Surrey.

Silica sand which is to be used for glass manufacture requires a significant amount of processing prior to being suitable for onward shipment to the glass manufacturers. This processing requires large and capital intensive plant such as the one operated by Sibelco UK Ltd which is located at Leziate. Consistency of material is an important consideration and this requires blending of sand from different areas of the working. The processing plant site includes a rail head to export the processed mineral for use by glass manufactures elsewhere. Norfolk is one of the most important sources of silica sand in Great Britain, accounting for approximately 16 per cent of total silica sand production and 58 per cent of glass sand production in Great Britain in 2018.

Due to the cost and largely fixed nature of the processing plant and railhead, silica sand working has historically taken place in close proximity to the Leziate processing plant. However, this now means that the most accessible areas have either been worked or are in the process of being worked.

The 10 year rolling average of silica sand sales in Norfolk was 780,700 tonnes in the period 2010-2019. The 3 year rolling average of silica sand sales was 854,100 tonnes in the period 2017-2019. The permitted reserves for silica sand extraction sites in Norfolk were 3.181 million tonnes at the end of 2019. Based on the 10 year sales average, at the end of 2019 there was a silica sand landbank of permitted reserves of over 4 years.



Sand and gravel resources are located throughout the County (with the exception of the Fens area in the far west and south-west of Norfolk). Sand and gravel is used in the construction of roads and buildings and it is a key ingredient in the production of concrete and mortar, asphalt coating for roads, as a drainage medium and in the construction of embankments and foundations. The distribution of sand and gravel sites throughout Norfolk is widespread with a relatively large number of small operators. In 2019 there were 25 permitted sand and gravel extraction sites in Norfolk operated by 14 different companies. There are, however, particular clusters of sand and gravel workings near to King's Lynn, in the north of Breckland District and around Norwich.

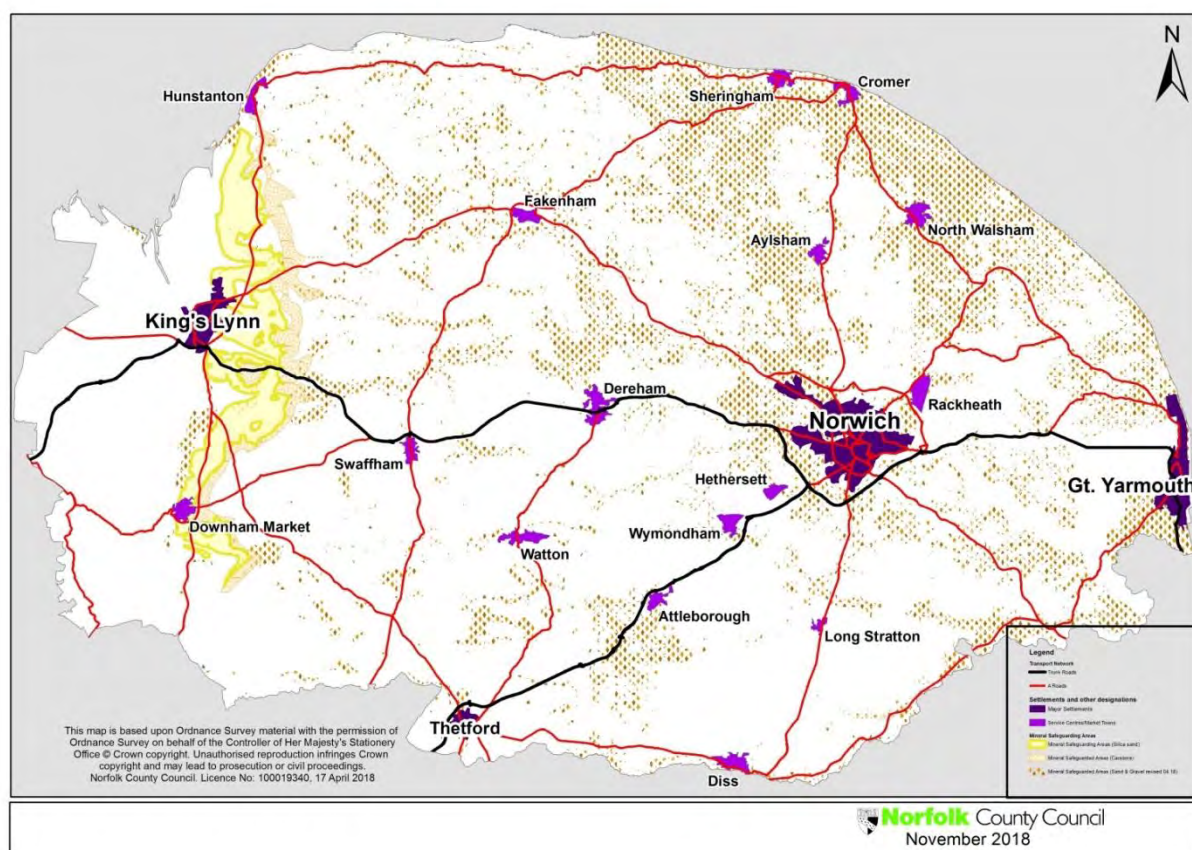
Sand and gravel production in Norfolk was 1.329 million tonnes in 2019. The 10 year rolling average of sand and gravel sales was 1.356 million tonnes in the period 2010-2019. The 3 year rolling average of sand and gravel sales was 1.48 million tonnes in the period 2017-2019. The permitted reserves for sand and gravel extraction sites in Norfolk were 13.52 million tonnes at the end of 2019. Based on the 10 year sales average, at the end of 2019 there was a sand and gravel landbank of permitted reserves of over 9 years.

Secondary and recycled aggregates are also sourced within Norfolk. The annual average quantity of inert and construction/demolition waste recovered at waste management facilities over the ten years from 2009-2018 was 412,100 tonnes, however, some parts of this waste stream are unsuitable for use as a recycled aggregate (such as soil or timber). The data is not comprehensive because many operations, such as on-site recovery, are not recorded.

Marine aggregate dredging is carried out by companies on behalf of the Crown Estate and the sites are licensed by The Crown Estate and the MMO. Aggregates from marine dredging are not currently received at any ports or wharves in Norfolk. A total of less than 500 tonnes of marine sourced aggregates was consumed in Norfolk in 2014 (the most recently available date), this represents such a small percentage of the total aggregates used in Norfolk that no adjustments have been made to the mineral requirement figures in the Norfolk Minerals and Waste Local Plan based on marine sourced aggregates. Norfolk County Council does not determine planning applications for marine aggregates and they do not form part of the Minerals and Waste Local Plan.

Clay and chalk are also extracted in Norfolk. Clay is primarily used in the engineering of landfill sites and in flood protection schemes. Chalk is primarily used as a liming agent for farmland. In 2019 there was one active clay working at Middleton, and three active chalk workings located at Castle Acre, Caister St Edmund and Hillington. However, the resource for these minerals is considered to be abundant in Norfolk relative to the demand.





**Figure 13: Mineral Resources within Norfolk**

## Waste

There are a number of waste management facilities within Norfolk. They include:

20 Household Waste Recycling Centres, provided by Norfolk County Council, which accepted nearly 67,000 tonnes of waste in 2018/19.

7 commercial composting facilities which received nearly over 107,000 tonnes of waste in 2018/19, as well as a few small community composting facilities;

There are two metal recycling facilities at Lenwade and Great Yarmouth, one metal recycling facility at King's Lynn docks and a large number of small sites accepting scrap metal or end-of life vehicles. The metal recycling facilities received nearly 192,000 tonnes of waste in 2018/19;

58 operational sites for the treatment and/or transfer of waste (including municipal, commercial and industrial, hazardous, clinical, construction and demolition), which received over 1,746,000 tonnes of waste in 2018/19 and 24 sites for the treatment and transfer of inert waste (including construction and demolition waste) only, which received over 260,000 tonnes of waste in 2018/19;

There are two non-hazardous landfill sites (Blackborough End and Feltwell) in Norfolk. Feltwell landfill site has not received any waste since 2012; it is required to be restored by 2041. Blackborough End landfill site did not receive any waste for disposal for nearly four years, during 2016 to 2019, but it started receiving waste again in 2020. Blackborough End landfill site is required to be restored by the end of 2026. These two sites have a permitted void capacity (remaining landfill space) for non-hazardous waste estimated to be 1.534 million cubic metres, plus capacity for 3.5



million tonnes of inert waste disposal. In 2018/19 over 260,000 tonnes of inert waste was received at inert landfill sites or used in the restoration of mineral workings.

There is a renewable energy plant operated by EPR at Thetford which received over 666,600 tonnes of waste in 2018/19. The waste received at this facility is poultry litter which is burned to produce energy.

#### **Agreement 29 :**

**It is agreed that:**

- 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand.**
- 2) A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand.**
- 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development.**
- 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy.**
- 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period.**
- 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns. Priority for the location of new waste management facilities will be given to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.**
- 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.**



## Section 10 – Conclusions and Next Steps

This Framework documents how the Norfolk Planning Authorities maintain effective cooperation between themselves, with the neighbouring district and county planning authorities, and with other key relevant agencies and utilities. In doing so it meets the relevant requirements of Section 3 of the 2019 National Planning Policy Framework (NPPF).

As referred to in section one of this document the government has announced a consultation on landmark reforms to the planning system under the Planning for the Future White Paper<sup>97</sup> which includes the proposed change to abolish the Duty to Cooperate. Once further clarification is provided by central government through new legislation and a revised National Planning Policy Framework it will become clear if Norfolk Planning Authorities can continue to address strategic planning matters through a revision of this document.

However Norfolk Planning Authorities recognise the benefits of joint working beyond the Duty to Cooperate and will maintain the following agreement:

**Agreement 30 In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.**

There remains significant value in continuing with a work programme into the next financial year to address strategic cross boundary issues going forward.

As part of the proposed joint planning activity Norfolk Planning Authorities have agreed to undertake the following programme of work:

- **Investigate the production of a Norfolk Design Guide/Charter** - The white paper strengthens the need for local design initiatives and the work of the NSPF completed this year has highlighted that design guidance could help with both climate change and healthy living initiatives. The initial steps would be to investigate how this could best be achieved and to what level all authorities are willing to work to a single design guide.
- **Develop an implementation programme for a county wide RAMS tariff** and Enhanced Green Infrastructure Study - Subject to the approval of all Norfolk authorities to the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy there will be a requirement to implement and start collection of the new RAMS Tariff. The report and Natural England also recommend that further work is also carried out to undertake an enhanced Green Infrastructure audit and this should highlight appropriate measure in areas of deficiency.
- **Review of the Norfolk HELAA Methodology** - The County wide Housing and Economic Land Availability Assessment Methodology is now nearly 5 years old and based on the 2012 version of the NPPF. Norfolk Local Planning authorities have agreed to review this in light of any new requirements from a revised NPPF.

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<sup>97</sup> See [the planning for the future consultation - https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system](https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system)



- **Review of the health protocol** – as highlighted in section 7
- **Review of new evidence requirements to support the production of future local plans** - whilst the White paper lacks much detail, it is likely that evidence in a number of areas will need to be created or updated to support the production of local plans.
- **Possible Requirements to update this document** - Once further clarification is provided by central government through new legislation and a revised NPPF it will become clearer if Norfolk Local Planning Authorities can continue to address strategic planning matters through a revision to the NSPF.

There also remains other significant benefits to continue with the current strategic planning activities completed under this remit, these included:

- Maintaining links to other neighbouring counties and their strategic planning work.
- Maintain links to public bodies and Utilities involved in the preparation of local plans eg Natural England, Environment Agency, Anglian Water, MMO, and UKPN.
- Maintain links to other key initiatives in the county eg Water Resources East, Hydrogen East, Greater South East Energy Hub
- Support the county in the production of a county wide Infrastructure Delivery Plan and any potential economic or growth strategies
- Support of Local Plan processes across the county
- Maintain links to NHS estates and the CCG with regular meetings to share updates on key developments and progress of Local Plans
- Scope to continue to commission joint studies across the county to reduce costs

The current NPPF also sets out the requirement for local authorities to prepare and maintain one or more statements of common ground. This document is intended to meet this requirement in a single document for all matters relevant to all Norfolk Local Authorities. Additionally individual local authorities may seek to enter into further statements of common ground with neighbouring or other authorities to address further strategic planning issues as part of the local plan preparation process.

**Agreement 31: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.**



## Appendix 1 – NSPF Contacts:

Please direct all representations relating to the NSPF to the NSPF Project Manager as detailed below. Use the Local Planning Authority contact details only if you have enquiries concerning a specific authority area.

<b>NSPF Programme Manager</b>	
Trevor Wiggett City Hall St Peter's Street Norwich NR2 1NH Email: <a href="mailto:trevorwiggett@norwich.gov.uk">trevorwiggett@norwich.gov.uk</a>	
<b>Breckland Council</b>	<b>Broadland and South Norfolk Councils</b>
Andrew Darcey Planning Policy Manager Breckland Council and South Holland Council Elizabeth House, Walpole Loke Dereham NR19 1EE Tel 07901873599 Email : <a href="mailto:Andrew.Darcey@breckland.gov.uk">Andrew.Darcey@breckland.gov.uk</a>	Paul Harris Place Shaping Manager Broadland District Council Thorpe Lodge 1 Yarmouth Road Norwich NR70DU Tel 01603 430444 Email : <a href="mailto:paul.harris@broadland.gov.uk">paul.harris@broadland.gov.uk</a>
<b>The Broads Authority</b>	<b>Great Yarmouth Borough Council</b>
Natalie Beal Planning Policy Officer Broads Authority Yare House 62-64 Thorpe Road Norwich NR1 1RY Tel 01603 756050 Email : <a href="mailto:Natalie.Beal@broads-authority.gov.uk">Natalie.Beal@broads-authority.gov.uk</a>	Sam Hubbard Strategic Planning Manager Great Yarmouth Borough Council Town Hall, Hall Plain Great Yarmouth Norfolk NR30 2QF Tel 01493 846624 Email: <a href="mailto:sam.hubbard@great-yarmouth.gov.uk">sam.hubbard@great-yarmouth.gov.uk</a>
<b>Borough Council of King's Lynn and West Norfolk</b>	<b>Norfolk County Council</b>
Alan Gomm Planning Policy Manager Borough Council of King's Lynn and West Norfolk Kings Court, Chapel Street King's Lynn PE30 1EX Tel 01553 616237 Email : <a href="mailto:alan.gomm@west-norfolk.gov.uk">alan.gomm@west-norfolk.gov.uk</a>	Stephen Faulkner Principal Planner Norfolk County Council Martineau Ln Norwich NR1 2UA Tel 01603 222752 Email : <a href="mailto:stephen.faulker@norfolk.gov.uk">stephen.faulker@norfolk.gov.uk</a>
<b>North Norfolk District Council</b>	<b>Norwich City Council</b>
Mark Ashwell Planning Policy Manager North Norfolk District Council Council Offices, Holt Road Cromer NR27 9EN Mail : <a href="mailto:mark.ashwell@north-norfolk.gov.uk">mark.ashwell@north-norfolk.gov.uk</a> Tel 01263 516325	Judith Davison Planning Policy Team Leader City Hall St Peter's Street Norwich NR2 1NH Mail : <a href="mailto:judithdavison@norwich.gov.uk">judithdavison@norwich.gov.uk</a> Tel 01603 989314



## Appendix 2 – Cross Border Cooperation Initiatives

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
<b>Coastal Partnership East</b>	North Norfolk, Great Yarmouth, East Suffolk	Shared Coastal Management Team for the four authorities.	Ongoing	Coastal Zone Planning Statement of Common Ground (2018), setting out an agreed approach to coastal planning ( <u>note</u> additional signatories to Statement: Broads Authority, BC King's Lynn & West Norfolk; and endorsed by Environment Agency).	<u>Coastal Partnership East Website - <a href="https://www.coasteast.org.uk/">https://www.coasteast.org.uk/</a></u>
<b>Membership of Broads Authority</b>	Broadland, Great Yarmouth, North Norfolk, Norwich, South Norfolk, East Suffolk, Norfolk and Suffolk.	Each provides members to govern the Broads Authority.	Ongoing		<u>Membership of Broads Authority - <a href="http://www.broads-authority.gov.uk/about-us/who-we-are/members/meet-our-members">http://www.broads-authority.gov.uk/about-us/who-we-are/members/meet-our-members</a></u>
<b>East Suffolk/Great Yarmouth sub regional meetings</b>	East Suffolk, Great Yarmouth, Broads Authority.	Quarterly Periodic meetings between these three eastern authorities to discuss strategic cross boundary issues pertinent to the area.	Ongoing	East Suffolk Local Plan Duty to Cooperate Statement of Common Ground (2018) on Housing Market Area, Functional Economic Area and Objectively Assessed Need, between East Suffolk, Great Yarmouth, Broads Authority, South Norfolk, Suffolk Coastal, and Mid-Suffolk.	n/a
<b>Norfolk Coast (AONB) Partnership</b>	Great Yarmouth, North Norfolk, King's Lynn & West Norfolk, Norfolk, Broads Authority, Natural England	Management of the Norfolk Coast Area of Outstanding Natural Beauty.	Ongoing	The Partnership also includes 2 community representatives.	<u>Norfolk Coast (AONB) Partnership website - <a href="http://www.norfolkcoastaonb.org.uk/partnership/core-management-group/169">http://www.norfolkcoastaonb.org.uk/partnership/core-management-group/169</a></u>
<b>Memorandum of Understanding – Treatment of Housing and Employment Needs</b>	Broads Authority, Broadland, South Norfolk, Norwich, Great Yarmouth, East	Agreed mechanism for distribution of housing (and employment) development in relation to targets for	2014 (and previously)	Further Statement of Common Ground (2017) between Broads Authority and Great Yarmouth Borough Council updating and	n/a



Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
<b>and Delivery in the Broads Authority Area</b>	Suffolk, Norfolk, Suffolk.	overlapping district and Broads areas.		specifying this in relation to housing in Proposed Broads Local Plan	
<b>New Anglia Local Enterprise Partnership</b>	All Norfolk and Suffolk District and County Councils	To lead economic growth and job creation across Norfolk and Suffolk.	Ongoing	Partnership also includes private sector and education representatives.	<a href="https://newanglia.co.uk/">New Anglia Local Enterprise Partnership website - https://newanglia.co.uk/</a>
<b>Wherry Line Community Rail Partnership</b>	Norfolk, Suffolk, Norwich, Broadland, Great Yarmouth, East Suffolk.	To promote the railway and the surrounding area to develop economic and environmental benefits for residents, visitors and tourists.	Ongoing	Partnership also includes Abellio Greater Anglia, Network Rail, Railfuture, Norfolk Association of Local Councils, rail users, station adopters, RSPB, and local businesses.	<a href="https://www.greateranglia.co.uk/about-us/community-rail-partnerships">Greater Anglia Community partnerships - https://www.greateranglia.co.uk/about-us/community-rail-partnerships</a>
<b>Great Yarmouth Transport and Infrastructure Steering Group</b>	Great Yarmouth, Norfolk, Environment Agency, Highways England	To promote and coordinate infrastructure improvements in, around and benefitting Great Yarmouth Borough	Ongoing		<a href="https://great-yarmouth.cmis.uk.com/great-yarmouth/Committees/CommitteeSystemfromMay2016/tabid/142/ctl/ViewCMIS_CommitteeDetails/mid/562/id/170/Default.aspx">Great Yarmouth Transport and Infrastructure Steering Group - https://great-yarmouth.cmis.uk.com/great-yarmouth/Committees/CommitteeSystemfromMay2016/tabid/142/ctl/ViewCMIS_CommitteeDetails/mid/562/id/170/Default.aspx</a>
<b>A47 Alliance</b>	Norfolk, Great Yarmouth, Broadland, Norwich, Breckland, King's Lynn & West Norfolk, Broads Authority	Seeks to promote the dualling of the A47.		Alliance also includes Peterborough & Cambridgeshire local authorities, MPs, business groups, LEs, etc.	<a href="http://www.a47alliance.co.uk/">A47 Alliance website - http://www.a47alliance.co.uk/</a>
<b>Greater Norwich Development Partnership</b>	Norwich, Broadland, South Norfolk, Norfolk County Council and the Broads Authority	Partnership to produce Local Plan for Greater Norwich Area and address related planning policy issues such as housing land supply and monitoring. This involves a member level group and joint officer team.	Ongoing		<a href="http://www.greaternorwichgrowth.org.uk/">Greater Norwich website - http://www.greaternorwichgrowth.org.uk/</a>
<b>Greater Norwich Growth Board</b>	Norwich, Broadland, South Norfolk, Norfolk County Council and the Broads Authority	Member level Board and joint officer team for strategic investment planning and delivery across the Greater Norwich area. This includes pooling of CIL receipts and a joint CIL process.	Ongoing		<a href="http://www.greaternorwichgrowth.org.uk/">Greater Norwich website - http://www.greaternorwichgrowth.org.uk/</a>



Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
<b>Norfolk Strategic Planning Officers Group</b>	All Norfolk Local Planning Authorities	Monthly meeting of Heads of Planning Policy teams to discuss cross boundary issues.	Ongoing		<a href="http://www.norfolk.gov.uk/nsf">Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf</a>
<b>Norfolk Member Forum</b>	All Norfolk Local Planning Authorities	Over sees Duty to Cooperate requirements at a member level, in particular the production of the NSPF.	Ongoing		<a href="http://www.norfolk.gov.uk/nsf">Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf</a>
<b>Norfolk Strategic Planning Framework</b>	All Norfolk Local Planning Authorities	Shows how the Authorities work together and forms the Statement of Common Ground for the area. Addresses cross boundary issues.	Reviewed for 2021.		<a href="http://www.norfolk.gov.uk/nsf">Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf</a>
<b>The Wash and North Norfolk Marine Partnership</b>	East Linsey, Boston, Fenland, South Holland, Kings Lynn & West Norfolk, North Norfolk, Lincolnshire County Council and Norfolk County Council	Local Communities and Management Groups working together to protect marine heritage	On-going	Many other Agencies and local groups involved	<a href="https://wnnmp.co.uk/home/partnerships/">The Wash and North Norfolk Marine Partnership website - https://wnnmp.co.uk/home/partnerships/</a>
<b>Norfolk/Suffolk Cross border Meeting</b>	Babergh and Mid Suffolk, South Norfolk, Great Yarmouth, Broads Authority, Ipswich Borough, Suffolk County, West Suffolk, Breckland, Kings Lynn & West Norfolk, East Suffolk	Quarterly meetings of Planning Policy teams to discuss cross boundary issues.	Ongoing		
<b>Wisbech Access Strategy Steering Group</b>	Kings Lynn & West Norfolk, Norfolk County Council, Cambridgeshire County Council,		Ongoing		



Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
	Fenland DC, Wisbech Town Council				
Norfolk Rail Group	Norfolk & Suffolk County Councils, all districts		Ongoing		
Joint SFRA Update	Kings Lynn & West Norfolk, North Norfolk DC, Greater Norwich, Broads Authority, Great Yarmouth	Team over was the production of a Joint SFRA across most of Norfolk	Completed		
East of England Aggregates Working Party	Norfolk, Suffolk, Essex, Hertfordshire and Cambridgeshire County Councils. Peterborough, Thurrock, Southend-on-Sea, Luton, Bedford, Central Bedfordshire Councils	Quarterly meetings. Collect data relating to the supply and demand of aggregates, publish an annual monitoring report, provides technical advice to Mineral Planning Authorities on their Local Aggregate Assessments. Line of communication between MPAs and MHCLG.	Ongoing	The EoEAWP also includes representatives from the minerals industry, Marine Management Organisation, and MHCLG. Includes feedback and liaison with London AWP and South East AWP.	<a href="http://www.centralbedfordshire.gov.uk/planning/minerals-waste/aggregate/overview.aspx">East of England Aggregates Working Party web page - http://www.centralbedfordshire.gov.uk/planning/minerals-waste/aggregate/overview.aspx</a>
East of England Waste Technical Advisory Body	Norfolk, Suffolk, Essex, Hertfordshire and Cambridgeshire County Councils. Peterborough, Thurrock, Southend-on-Sea, Luton, Bedford, Central Bedfordshire Councils	Quarterly meetings. Forum for discussion relating to waste planning including waste data, capacities and forecasting.	Ongoing	The EoEWTAB is also attended by the Environment Agency. Includes feedback and liaison with London WTAB and South East WTAB.	



# Norfolk Strategic Planning Framework

Shared Objectives for extending 4G coverage and the rollout of 5G infrastructure in the County of Norfolk

September 2020

**Mobile**<sup>UK</sup>



Borough Council of  
**King's Lynn &  
West Norfolk**



**NORWICH**  
City Council



**Norfolk** County Council



## INTRODUCTION

Mobile connectivity to fast, reliable data services is becoming increasingly important to residents and businesses in Norfolk and constitutes a common expectation of everyday life. However mobile coverage in Norfolk, particularly rural areas isn't as good as it can be with a recent independent survey suggesting only 82 percent of call attempts in Norfolk are successful<sup>1</sup>. While the survey shows Norfolk is comparable to the rest of the UK in some respects, it's clear there is still considerable room for improvement, particularly in ensuring people have reception wherever they are in the county.

To achieve this Norfolk authorities, in partnership with Mobile Network Operators need to be in alignment around a shared goal to the roll out of improvements and updates to the network, to vastly reduce the reception black spots prevalent within Norfolk.

The Norfolk Strategic Planning Member Forum has set up an officer group with the support of Mobile UK, to explore how to improve 4G and 5G infrastructure roll-out in Norfolk. This group is focused on setting out what operators and Norfolk's local authorities need to do to improve digital connectivity.

Improvements in mobile connectivity will entail both the extension of 4G coverage and the introduction of 5G in due course. 4G will not only improve mobile coverage where it is currently absent but will also provide the underpinning infrastructure for 5G, they will be complementary technologies.

The private sector is responsible for the delivery of Norfolk's digital connectivity. Further 4G and 5G roll-out will require significant investment by private telecoms operators. Outside of the Norwich Urban area, Norfolk is a challenging environment, whose digital infrastructure needs have been neglected in the past.

## Future Growth

Smartphone ownership has grown from 52% in 2012 to 87% in 2018<sup>2</sup> and data usage is predicted by Giff Gaff to increase to as much as 98.34GB per month by 2025 from 3.95GB in 2017<sup>3</sup>

Businesses see broadband and mobile connectivity as critical to their company's growth. Digital connectivity also enables local authorities to deploy smart technologies which can help them plan services more efficiently. Everything from water and energy consumption to air quality and waste increasingly depend on data that needs to be transferred in real time for analysis.

To meet rising demand for data, operators expect to introduce the fifth generation (5G) of mobile technology from late 2019 into the major conurbations<sup>4</sup>. 5G is expected to directly contribute billions of pounds a year to the UK economy. 5G is likely to reach speeds that are twenty times faster than 4G LTE. 4G LTE has a peak speed of 1GB per second; 5G is able to achieve speeds of 20GB per second.

The Government's £1 billion Emergency Services Mobile Communications Programme (ESMCP) will ensure that Britain is a world leader in Emergency Services communications, and a 4G pioneer. The network and infrastructure provider EE has been selected to deliver critical new 4G voice and data network for Britain's Emergency Services. EE already has the UK's biggest and most mature 4G network, and will expand coverage and enhance resilience to meet the Emergency Services' critical communications requirements.

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<sup>1</sup> See <https://www.norfolk.gov.uk/mobilemap>

<sup>2</sup> See Deloitte Survey - <https://www.deloitte.co.uk/mobileuk/>

<sup>3</sup> See <https://www.ispreview.co.uk/index.php/2018/01/giffgaff-predict-uk-5g-mobile-data-use-per-user-100gb-2025.html>

<sup>4</sup> Including Glasgow, London, Manchester, Liverpool, Birmingham, Cardiff and Bristol



### Mobile Coverage in Norfolk

Norfolk County Council commissioned AWTG (Advanced Wireless Technology Group) to conduct an independent benchmark assessment of mobile coverage and user experience across Norfolk. The benchmarking campaign was conducted in February and March 2018 using a robust four-tier methodology to maximise the extent and breadth of data collection. This included walk testing at over 30 locations including museums, tourist attractions, camping and caravan sites, rail testing on all main rail routes in Norfolk, drive testing on over 5,500 kilometres of Trunk, A, B and C class roads across Norfolk and stationary testing at enterprise zones and 28 Norfolk Broads mooring points. The scope of the campaign covered a detailed assessment of the GSM (2G), UMTS (3G) and LTE (4G) radio network (coverage) performance and received signal strength of the four main mobile network operators in the UK.

The headline results are that where coverage is available the quality of service is good. However, there are significant gaps in coverage across all 4 providers such that one call in 5 placed will currently fail.

The table below shows how often the signal strength matches the Mobile Network Operators (MNO) minimum target. When using a regular phone the latter figure would be the one which would relate to a good user experience.

Metric	Summary of Main Findings
2G	Coverage <ul style="list-style-type: none"><li>• 98.83% Service availability on test handset based on MNOs defined threshold</li><li>• 74.28% Service availability on test handset based on Ofcom defined threshold</li></ul>
3G	Coverage <ul style="list-style-type: none"><li>• 89.74% Service availability on test handset based on MNOs defined threshold</li><li>• 65.68% Service availability on test handset based on Ofcom defined threshold</li></ul>
4G	Coverage <ul style="list-style-type: none"><li>• 98.92% Service availability on test handset based on MNOs defined threshold</li><li>• 83.38% Service availability on test handset based on Ofcom defined threshold</li></ul>
Voice	<ul style="list-style-type: none"><li>• Voice performance acceptable when user is within the coverage area.</li><li>• 82% call attempt success rate and 98% call completion rate.</li><li>• Average voice quality is 3.93 out of 5</li><li>• Average call setup time is 3.27 seconds</li></ul>
Data	<ul style="list-style-type: none"><li>• Data performance acceptable when user is within the coverage area.</li><li>• 14.54Mbps average DL speed / 7Mbps average UL speed</li><li>• Average download time for webpage is 6.86 seconds</li><li>• 86.46% of web browsing tests completed successfully</li></ul>



### **Implications for 5G roll out**

5G will use a wide range of frequency bands<sup>5</sup>, such as 700MHz, 3.4GHz and 30GHz

The higher frequencies of 5G will have a shorter range. Achieving the levels of network capacity where there is a very high volume of network traffic will over time increasingly rely on smaller cells situated nearer to the ground on lampposts and other street furniture, in addition to rooftop and ground-based masts.

Whilst more base stations will be required, Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which can be rolled out on existing infrastructure where possible. The initial phase will be to strengthening the existing infrastructure or rebuilding the network where required, then densification for major areas using small high frequency cells which will be rolled out in areas with high demand. The rollout of 5G commercially is expected to commence in late 2019, and take several years to complete. Getting high quality 5G infrastructure rolled out across Norfolk will be important to delivering the vision of the Norfolk Strategic Planning Framework.

Mobile operator investment in mobile coverage is ongoing around the UK. In addition, Ofcom is currently consulting on the 2020 auction of further spectrum licences (in 700MHz and 3.8GHz bands). It is expected that further 4G coverage obligations for rural coverage will be attached to the new licences. It is very important that Norfolk is well positioned to take advantage of the new rural coverage obligations and also for 5G rollout (which is expected to occur initially in urban areas, where the capacity need is greatest.)

Mobile networks are integrated entities made up of cell sites, switches, and backhaul. Backhaul is the cables that link up the cell sites to the switches that transmit data quickly around the network. Making Norfolk ready for 5G also means making it easier to roll out full-fibre connections underground.

The recently announced £8m of funding from DCMS to upgrade 372 Norfolk sites will enable 230 schools, 108 Norfolk County Council Corporate buildings (including 38 libraries) and 34 fire stations to be upgraded to gigabit (1,000 mbps) fibre internet connections within two years. Where possible, fibre backhaul will also be provided to improve mobile data capacity.

Extending 4G coverage and meeting the scale of the 5G and digital roll-out challenge will require a considerably more joined-up approach than is currently the case. This means a complete alignment of Norfolk's local planning authorities and operators towards a shared goal to improve digital connectivity, focused on meeting the specific challenges of rolling out 5G.

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<sup>5</sup> <https://5g.co.uk/guides/5g-frequencies-in-the-uk-what-you-need-to-know/>



## **What can Mobile Network Operators and their contractors do to improve mobile connectivity in Norfolk?**

In order to drive progress in Norfolk, we need to ensure that mobile operators are committed to following the Code of Best Practice for Mobile Network Development<sup>6</sup>, and in relation to the Broads, the National Parks England and Mobile UK Joint Accord / Memorandum of Understanding<sup>7</sup> in particular:

1. Sharing suitable mobile digital connectivity infrastructure sites where this meets network objectives.
2. To work with the Norfolk local planning authorities to facilitate early access to public sector owned buildings and structures to improve coverage. Where possible, fibre backhaul will also be provided to improve mobile data capacity (for 4G and 5G).
3. Share Roll out plans at county level to provide a valuable opportunity for operators to share information about their proposals with local planning authorities who can in turn offer feedback and advice on the suitability of the plans<sup>8</sup>.
4. Detailed consultation with planners at both pre-application and planning application stages, working together to solve the continuing demand for mobile connectivity in a timely way. Ensure that applications are clearly presented and understandable to both professionals and members of the public
5. Consultation with communities and other stakeholders about network developments, in accordance with the Code of Best Practice.
6. Proposing appropriate design solutions in line with national and local policies which achieve technical objectives.

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<sup>6</sup> See <http://www.mobileuk.org/codes-of-practice.html>

<sup>7</sup> See [https://www.nationalparksengland.org.uk/\\_data/assets/pdf\\_file/0009/1253682/Mobile-UK-National-Parks-England-Accord-2018.pdf](https://www.nationalparksengland.org.uk/_data/assets/pdf_file/0009/1253682/Mobile-UK-National-Parks-England-Accord-2018.pdf)

<sup>8</sup> Where required Non-disclosure agreements can be in place to ensure market sensitive information is not shared with competitors



## What can Local Planning Authorities do to improve mobile connectivity in Norfolk?

Local planning authorities can support Mobile Network Operators in their improvements to mobile connectivity in Norfolk through:

1. Ensuring Local plans and Economic Strategies recognise the benefit of reliable connectivity and include actions to be taken at local level to enhance mobile connectivity.
2. Making local authority-owned buildings and structures available for use where appropriate for the location of equipment needed to improve mobile connectivity in locations which currently have poor coverage.<sup>9</sup>
3. Respond positively to requests for pre-application advice, where new or upgraded infrastructure is proposed the potential impacts on the local environment will need to be considered. The Norfolk local planning authorities encourages early engagement from operators where new network infrastructure is proposed in order to identify and discuss any particular issues with the design or siting of new equipment and to reach mutually agreeable solutions. Norfolk local planning authorities will engage with the County Council for applications which may have a wider impact on other existing built and natural infrastructure. The County Council are also able to offer advice and assistance with way leaves. Operators will be encouraged to develop innovative solutions in terms of design, structure, materials and colouring to ensure that these issues are appropriately addressed and the impact of installations minimised.
4. All planning applications for telecommunication infrastructure will follow the statutory requirements in terms of providing timely decisions on planning applications raising issues sufficiently early to allow mobile operators time to provide information and work together to find solutions. All application for new base stations and upgrades to existing ones will be considered in line with national and local planning policy. Any planning conditions will be applied appropriately and proportionately and will not duplicate conditions already imposed by statutory instruments such as the Electronic Communications Code<sup>10</sup>.
5. New major development sites (over 10 dwellings) and large scale buildings should include infrastructure design from the outset to sympathetically locate masts, and/or provide backhaul ducting to negate the need for retro-fix infrastructure.
6. Work with Mobile UK to maintain communication channels about progress of technology and the roll out of 5G and network enhancements. Provide knowledge on telecommunications planning, including permitted development rights. Share local plans and growth locations to understand the impact on mobile network capacity and coverage taking into account local economic development, digital connectivity, sustainability, and social inclusion considerations.

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<sup>9</sup> See [www.norfolk.gov.uk/mobileassetregister](http://www.norfolk.gov.uk/mobileassetregister)

<sup>10</sup> <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/policy/electronic-comm-code>



## **National Planning Policy Context**

The National Planning Policy Framework 2019 (NPPF) sets out government's planning policy approach to achieving sustainable development for England. Paragraph 20 (b) states an expectation that development plans should contain strategic policies making sufficient provision for telecommunications infrastructure. Delivery of advanced, high quality and reliable communications infrastructure is covered in section 10 'Supporting high quality communications' paragraphs 112 to 116. The NPPF considers that such communications infrastructure is essential for economic growth & social wellbeing.

The framework policies lay out expectations of plan makers, applicants and decision takers – encouraging local authorities to take a pro-active and supportive approach, stating: "Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections... providing access to services from a range of providers"; and for applicants to fully consider the appropriate locations and impacts of their proposals relating to design, location and in accordance with International Commission guidelines.

Paragraph 39 of NPPF 2018 advises that Pre-application early engagement has significant potential to improve the efficiency & effectiveness of the planning application system for all parties.

Not all communications infrastructure requires formal planning consent, certain installations may be carried out under permitted development or application for prior approval under Schedule 2, Part 16 'Communications': Classes A to E of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

On 22 July 2020 the Government published its response to the joint MHCLG and DCMS consultation published last year on proposed planning reforms to support the deployment of 5G and extend mobile coverage. This included the principle of amending permitted development rights for operators with rights under the Electronic Communications Code and the circumstances in which it would be appropriate to do so.

The government response summarises the submissions received and confirms its intention to take forward the in-principle proposals consulted on. This will be subject to a technical consultation with representatives from both the local planning authority and mobile industry sectors representatives, on the detail of the proposals, including for appropriate environmental protections and other safeguards to mitigate the impact of new mobile infrastructure.

This will be undertaken prior to amending Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to enable:

- the deployment of taller and wider masts;
- building-based masts located nearer to highways; and
- faster deployment of radio equipment housing, such as equipment cabinets.

## **Local Planning Policy Context:**

This guidance has been prepared to inform the Local Planning Policy of all local planning authorities under the Norfolk Strategic Planning Framework in order to provide a uniform and pro-active approach to communications infrastructure in Norfolk countywide. It is intended that the policy content provided here may be incorporated into individual Local Plans as they are reviewed.



## **Suggested Telecommunications Infrastructure Policy**

The Council will support proposals for the provision and improvement of new telecommunications infrastructure provided that:

- It has been demonstrated that there are no reasonable opportunities for sharing a site, mast or facility with existing telecommunications infrastructure in the area that would not result in a greater visual impact, and;
- The installation and any associated apparatus is sited and designed to avoid any unacceptable impact on the character, on residential amenity or on the safe and satisfactory functioning of highways and appearance with particular consideration given to the impact on:
  - designated or locally identified heritage assets; or
  - internationally and/or nationally protected nature conservation sites, AONBs, regional and local sites, and areas of designated open space (as shown on the Policies Map).
  - the special qualities of the Broads
- It has been demonstrated that the siting of the proposal and any other additional equipment involved with the development does not unduly detract from the appearance of the surrounding area, including the use of innovative design and construction and/or sympathetic camouflaging, and;
- Any building-mounted installations would not have an unduly detrimental impact on the character or appearance of the building.
- Prior approval of the siting and appearance of the development will be required if the proposal is within or would affect the Norfolk Coast AONB, The Broads, a Conservation Area, a Listed building, a site of archaeological importance or a site designated for its nature conservation importance.

Although larger scale telecommunications development requires planning permission, there are many aspects which do not, as they are permitted by virtue of the General Permitted Development Order (GPDO). Where it is the intention to install equipment under permitted development rights that is subject to the prior approval procedure, consideration must be given to the siting and appearance of development in accordance with the requirements of the GPDO and the relevant safeguards imposed by the operator licensing regime. The GPDO also requires operators to remove any telecommunications equipment when it is redundant elsewhere.

All residential developments and new employment generating development should consider the mobile telecommunications requirement of the development proposals to ensure and demonstrate that there would be sufficient coverage. This information should be submitted in a site connectivity plan during the pre-application and application stages.



# Climate Change and the Planning System

## 1. Introduction

In summer 2019 the Norfolk Strategic Planning Member Forum requested that a Climate Change sub group should be set up as part of the update process to the Norfolk Strategic Planning Framework. The group would review information in relation to Climate Change with a specific focus on the role of and impact on Local Plans and the planning system generally. It would also explore some of the emerging policy work around climate change, and look at best practice where applicable.

Working collaboratively through the Norfolk Strategic Planning Member Forum, Local Planning Authority officers, along with colleagues from the Environment Agency, Local Enterprise Partnership and Norfolk County Council, worked together to research and investigate how measures identified through this research could help inform local plans in order to address some of the impacts of climate change through land use policies at a strategic level.

It should be noted at the outset that planning's role is one of facilitation through mitigation, adaptation and resilience. Although there is a statutory duty to address climate change in the National Planning Policy Framework, the planning system cannot address climate change alone. The subject is broad and cross cutting with impacts ranging from biodiversity to carbon reduction, energy efficiency and supply, settlement distribution, investment choices, technical change and innovation and consumer choice. Addressing Climate change is a shared responsibility. Planning can set out a strategic framework and lay down challenges but delivery through planning requires partnership work, political buy in and effective coherent and consistent approaches through investment strategies as well as legislation and regulatory change. Furthermore, it should be noted that planning can only really affect and influence schemes that need planning permission from the time the policies are in place. Many more buildings are in place now than will be permitted over the coming years.

## 2. Background

Climate change has been embedded into Land Use Planning for many years; significant emphasis is placed on planners to address climate change through achieving sustainable development. It is recognised that considerable national, international and local research in relation to climate change has been completed in recent years. This includes reports by the Intergovernmental Panel on Climate Change, and there continues to be emerging changes in relation to Government policy on the matter. As a result of this there are already measures incorporated into most local plans to support the impacts of climate change and measures to reduce carbon emissions.

In June 2019 the government amended the Climate Change Act 2008 to extend the national carbon reduction target within it with the aim to reduce carbon levels to net zero by 2050. Nationally many local authorities have either declared climate emergencies, and/or set their own locally applicable targets, replicating the government's or extending it further, as well as enshrining the concept into corporate objectives and plans.



Within Planning, Local Plans can play a central role in helping to facilitate this key national environmental objective. Effective strategic plan making can help deliver sustainable development and help address the challenges that climate change brings, complementing measures outside of the planning sphere but not resolving climate change challenges on its own. Clearly the County is vulnerable to the impacts of climate change from rising sea levels to changing weather patterns. The costs of climate change are projected nationally to be high and it is emphasised that not taking action could cost more than taking steps to reducing emissions now to avoid the worst impacts of climate change in the future. Sustainable development through land use policies is regarded as a key means of addressing climate change and as such the planning system has a duty to ensure that action is taken to encourage and deliver more sustainable development.

Planning for sustainable development need not only cover mitigating and adapting to climate change, it can also help set a framework and assist in changing attitudes and perceptions. Another aspect is that of sequestration of greenhouse gases to reduce the amount in the atmosphere. Local Plans can encourage more sustainable development from the small scale (e.g. improving energy efficiency of dwellings so as to reduce carbon emissions and encourage the transition to cleaner energy, ensuring water is used effectively), to the strategic (e.g. encouraging the sustainable distribution of growth, increasing accessibility and reducing the reliance on carbon emissions from private and public transport).

Mitigating climate change through land use planning by addressing the causes of climate change can be achieved in a number of ways:

- Locating development as near to existing key services and facilities as possible.
- Delivering decentralised energy supplies and promoting its use in existing buildings.
- Supporting the delivery of low carbon and renewable energy.
- Ensuring new development is as energy efficient as possible.

Adapting to climate change addresses consequences and can include:

- Delivering on site sustainable drainage systems.
- Reducing water consumption.
- Adopting precautionary approaches to areas liable to flooding and at risk from coastal change.
- Ensuring that the design of buildings helps them remain cool in summer and warm in winter.

All of the above will demand innovative approaches, and lead to new technology and changes in the landscape and historic buildings which will undoubtedly challenge traditional opinions and views.

As well as ensuring development proposals will mitigate and adapt to the impacts of climate change, Local Plans should reflect the local authorities' overarching aims in building up resilience to climate change and managing long term risk. Action on climate change should be an integral part of the culture of plan-making and should be embedded and integrated in policy preparation. Local Plans are however not a panacea; their focus remains on land use and policy approaches are subject to legal and soundness tests, viability and test of reasonableness that are applied as material considerations at both plan making and decision-making stages. Local Plans also tend to mostly relate to new development that needs planning permission – much development is already in place and some schemes do not need planning permission.



Local Planning Authorities are therefore likely to need to evaluate planning applications through a climate change lens and ensure future local plans clearly set out the decision-making framework, with particular emphasis on the following, for example:

- Placing more emphasis on co-locating uses and planning development near public transport links to reduce car travel.
- Setting more ambitious targets on energy efficiency in buildings.
- Encouraging the greater use of renewable energy.
- Embedding and prioritising climate change in local plan-making and when determining planning applications, including ensuring resilience to climate impacts such as flooding.
- Requiring travel plans with increased sustainable transport obligations - prioritising walking, cycling and public transport over reliance on the car.
- Increasingly plan and help facilitate for the switch to electrified transport.

It is however recognised that each local authority has its own particular circumstances, decisions and actions and these will need to be tailored to local circumstances. However, more co-ordinated efforts are needed where there is a need to follow agreed principles so that future planning decisions are consistently made.

In future years addressing climate change will need to remain a high priority for the planning system if national emission targets are to be achieved. This, though, will be at a time of increasing pressures brought upon LPA's through target driven approaches and increasing deregulation of the planning system and other legislative changes, including the potential for wholesale reform and wider Council devolution.

This report, and the supporting papers, provides some of the tools to enable planning teams to consider how best to embed climate change within the planning system, in advance of any systemic changes that will come through as part of the radical review of the planning system, currently underway.

### **3. Planning White Paper**

It should be noted that at the time of writing this paper, the Government had consulted on fundamental changes to the planning system. One particular relevant proposed change, is that development management policies may be centralised and set at a National level. There are also potential standards for energy efficiency of buildings and electric vehicle charging points that could be set nationally over the coming years.

That being said, the timeline for implementing the final proposals is not known. It will involve redrafting of legislation and changes to the NPPF which could take some time. So, whilst changes may well be made to the planning system in future, recommendations within the report are relevant for the current local plans in production and could be 'in the meantime' policy approaches – in place until the national system is changed.



#### 4. Other benefits of addressing climate change

It is important to be aware that whilst these recommendations relating to topic areas may address climate change adaptation and mitigation, or sequestration of greenhouse gases, that is not the only benefit. It is often wise to do what is recommended, regardless of climate change, because of the many other benefits of which doing so brings. The elements of climate change are also woven into many policy areas with much cross-over, e.g. growth distribution, transport policies, environmental policies as well as specific policies on adaptation and mitigation as all have a role to play in addressing Climate change.

For example:

- Walking and cycling rather than driving a motor vehicle can reduce greenhouse gas emissions from burning fuel. Adopting a more active lifestyle can lead to improved health and well-being as well as saving individuals money.
- An energy efficient home requires less energy and therefore reduces the amount of emissions associated with producing energy, but it also reduces money a household or business spends on energy bills.
- Green infrastructure can help sequester carbon dioxide but it can also help biodiversity and increase access to the countryside and other greenspaces, which can in turn support mental and physical well-being.
- Tackling climate change is part of facilitating and enabling clean growth. It can help economic recovery and provide job opportunities such as retrofitting of properties, technology development e.g., EVs and electrification of transport and the renewable energy sector.



## 5. Conclusions

### 5.1 County Wide Agreements

The conclusions of this work are set out in this section. The group proposes that the Norfolk Strategic Planning Framework should include a new agreement which sets out Local Planning Authorities' commitment to address climate change as follows:

#### **Recommendation 1:**

**Local Planning Authorities in Norfolk agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, Local Authorities agree to consider the evidence contained in the NSPF Climate Change research Paper when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Local Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.**

Each Local Authority can choose to take actions further than suggested depending on local needs or circumstances.

The Planning White Paper strengthens the need for local design initiatives and the work of this climate change group has highlighted that design guidance could help with both climate change and healthy living initiatives. As such there is a strong case for looking at a Norfolk Design Guide or Charter to underpin much of the recommendations that follow. It is suggested that the initial steps would be to investigate how this could best be achieved and to what level all authorities are willing to work to a single design guide. It is clear that for this to succeed that external and community involvement would be required, as well as exploration of how a county design guide would work in practice with local and national guides for decision makers. There would be the need to understand in more detail any forthcoming proposed changes to the NPPF and legislation. In addition, any existing, or planned, intentions of each local planning authority, will need to be factored in to assist formulate further guidance. It is important to note that Local Planning Authorities could still produce their own design guidance; this county-wide guide or charter would not preclude or prevent that. Indeed, such topic areas as vernacular and aesthetics may well be best addressed by individual Local Planning Authorities.

The group propose that the Norfolk Strategic Planning Framework should include a further new agreement which sets out Local Planning Authorities' commitment to investigate the production of a countywide Design Guide:

#### **Recommendation 2:**

**Norfolk Local Planning Authorities agree to work together to investigate the production of a county wide design guide and produce a brief/scope for this work. This work could help facilitate climate change and healthy living initiatives across the county by providing high-level principles.**

The design guide would meet the requirements of the National Design Guide and look at other country wide initiatives like Building for a Healthy Life. Mitigating for and adapting to climate change could be a key consideration of this guide. Individual Local Planning Authorities could still produce their own guide or they can be produced as part of neighbourhood plans.



The research produced a number of topic-based papers, the conclusions of which can be summarised as below, a summary of each of the paper's key points is attached in Appendix A – Key points from Supporting Documentation.

## **5.2 Energy efficiency**

### **Construction Standards**

- Local Planning Authorities could consider a policy around the use of the energy hierarchy – reduce energy need in the first place (design and orientation of development), energy efficiency and conservation, and then maximise use of sustainable energy (for example non fossil fuel based alternatives) and local energy networks. Local Planning Authorities could consider the use of energy statements to explain and justify the approach taken by developers.
- Local Planning Authorities could consider providing a percentage reduction against Part L of the 2013 Building Regulations (amended 2016). This percentage would need to reflect local viability and would be a 'meanwhile' policy approach prior to any national standard.
- Local Planning Authorities can explore the use of policies which require applicants to demonstrate how climate change has been taken into account in a scheme, this could include applications applying for an increase in floor space.
- For major schemes, whether building developments or transport schemes, Local Planning Authorities could specify the achievement of British Standard 'PAS 2080 – Carbon Management in Infrastructure Verification'.

### **Non-Residential Development**

- Local Planning Authorities could explore the use of BREEAM for non-residential development and aim for a standard that is appropriate for their area in terms of viability and the achievability of this standard.

### **Community-led renewable heat and energy networks/schemes**

- Individual LPAs may consider allocating sites for community heating and consider where it could be appropriate for the support of community heating schemes.

### **Embodied Energy in Buildings**

- Local Planning Authorities should have regard to the Historic England's guidance for adapting historic buildings to reduce carbon footprint.
- When appropriate policies are being reviewed, consider if any conversion policies or similar, set a stance that, subject to PD rights, the presumption is in favour of retention of a building. To allow the demolition of buildings, policies should require thorough justification for such an approach.

### **Light Pollution**

- Local Plans can consider dedicated light pollution policies where appropriate, perhaps using some of the approaches taken by those areas with dark skies.



### **Modern Methods of Construction (MMC)**

- MMC<sup>1</sup> could be considered for incorporation into design codes/guides of Local Plans within Norfolk where appropriate, and Local authorities can consider closer working with developers of larger schemes to adopt MMC as a key element, as these sites are built out.

### **5.3 Environmental**

#### **Integrated Constructed Wetlands**

- Local Plans could promote the use of integrated constructed wetlands as a way of treating wastewater and acknowledge the multiple benefits such an approach will bring.

#### **Peat<sup>2</sup>**

- Norfolk Local Planning Authorities could investigate the presence of peat in their area. If peat is prevalent, then it is suggested that they consider peat when allocating sites and address peat in relevant policies. There could also be potential for non-site specific policies relating to peat, if it is prevalent. Such policies could seek to reduce the amount of peat excavated and require excavated peat to be disposed of in a way that prevents carbon being released.

### **5.4 Reducing unnecessary car use and supporting the roll out of new technologies**

#### **Reduced/car free developments**

- For sites proposed for development in the centre of sustainable settlements with good provision of public transport, consideration could be given to proposals for car free developments or developments with reduced parking.

#### **Walking and Cycling**

- Local Planning authorities could consider seeking enhanced walking and cycle connectivity when considering planning applications or providing pre-application advice. The consideration is particularly important for windfall sites which will not have been scrutinised as part of the local plan process. Local planning authorities should consider the following through appropriate plans, policies and processes:
  - Better alignment of plans and decisions with identified local and national strategic infrastructure priorities for walking and cycling.
  - Ensure proposals seek enhanced connectivity to open space and seek to provide connections to, enhancement and maintenance of nearby existing walking and cycling networks.
  - Working with the Highway Authority to establish better provision for active forms of travel.
  - Consider simple, safe and convenient access to and from surrounding local facilities.
  - Consider guiding design principles for walking and cycle connectivity.
  - Engaging with specialists at plan-making, pre-application and planning application stages, particularly on larger planning applications.
  - Consider the use of the principles promoted by Sustrans:
    - Safety – space, users, speed
    - Directness – destination convenience
    - Coherence – part of a wider network, signed & navigable

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<sup>1</sup> For example modular build (buildings that are prefabricated off site that meet or exceed modern energy efficiency standards)

<sup>2</sup> Peat holds much carbon dioxide which is emitted to the atmosphere when it is dried out. So if excavated and disposed of poorly, peat can change from a carbon sink to a carbon source.



- Comfort – accessible and attractive to a wide range of users
- Attractiveness – design, lighting/quiet areas
- Consider requiring a walking & cycling strategy for all major development
- Ensure secure, well located cycle parking for all communal/shared buildings
- Securing funds for maintenance of the existing walking and cycling network (or new/expanded) or supporting infrastructure from new development where appropriate

### **Live-Work and working from home**

- Consideration could be given in Local Plans for the support of live-work units where they meet other local planning policies and subject to appropriate controls (i.e. Removal of PD rights). This would allow acceptable live-work units where there is demand.
- It is also suggested that policies encourage provision of flexible space in new dwellings (both new build and conversion) which could be utilised as home working facilities.

### **Electric Vehicles**

- Local Planning Authorities could consider setting standards in relation to the provision of electric vehicles charging infrastructure. Any standards would be in place until either a national standard is set by the Government, and/or linked to any reviewed parking standards produced by Norfolk County Council, as the Highways Authority. However, in the first instance the LPAs could agree an approach for off-street parking provision – commercial and domestic. Local Planning Authorities can also consider the following:
  - Having an appropriate provision for standard charging of EVs at home and work locations this would be a minimum provision of 7kW /32 amps power capacity.
  - Parking standards - location and design of EV bays have to be considered from the planning stage to maximise the number of cars that can be served by the same charging point, and ensuring that due provision is made to provide safe connectivity to the equipment.
  - On-street charging provision could be designed into the street scene as part of the design and construction process. There is difficulty and cost in retrofitting such provision.
  - Future proofing - develop short term solutions through preparing the site for future technology installations.

### **Travel plans and Public Transport**

- Local Plans could make due reference to the need to support sustainable and active travel on new developments through the production and delivery of Travel Plans as referenced in National Planning Policy Framework Section 9 paragraph 102. Countywide guidance on this can be found here: <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/highway-guidance-for-development/travel-plans>
- Local Authorities can ensure that the necessary infrastructure to support the provision of public transport is agreed early and encapsulated in the Transport Assessment/Agreement. In addition, appropriate behaviour change measures can be captured in the Travel Plan for a site to support the uptake of any public transport service. Where Travel Plans accompany a planning application, they could be produced in consultation with NCC Travel Plan Officers



## Appendix A – Summary of Key points from Supporting Documentation

### Walking and cycling

- The aim is to better promote active forms of travel, particularly walking and cycling to reduce unnecessary car use.
- Evidence clearly points to shorter trips (i.e. 1-5 miles) where walking and cycling can most effectively increase, and conversely reduce, travel by private car.
- There needs to be a much more joined up approach, with more collaboration and clear advice on how to realise the multiple aspirations.

### Consideration of using BREEAM assessments in planning policies for non-residential development.

- BREEAM is a sustainability assessment method for master planning projects, infrastructure and buildings.
- It recognises and reflects the value in higher performing assets across the built environment lifecycle, from new construction to in-use and refurbishment.
- Ratings available are: Pass, Good, Very Good, Excellent, Outstanding.
- It is not uncommon for LPAs to set different ratings based on floor area and/or unit number although development size should have less of an influence over the potential rating which can be achieved than say viability/development need and local priority.

### Design of new build dwellings - energy

- Homes – both new and existing – account for 20% of greenhouse gas emissions in the UK
- The Government consulted on (at the end of 2019) a Future Homes Standard
- Some Local Plans in Norfolk are under production and it may be appropriate to have a policy relating to energy usage of homes – a ‘meanwhile’ policy, whilst waiting for the new national standard/approach.

### Improving the energy use of existing housing stock.

- Dwellings/buildings that are already in place (around 29 million homes) will not necessarily be affected or have their energy use addressed as a result of policies in Local Plans/national policies.
- We will not meet our targets for emissions reduction without near complete decarbonisation of the housing stock.
- The General Permitted Development Order (GPDO 2015) Part 14 – Renewable energy already enables a range of installations related to renewable energy (subject to conditions).
- But retrofitting measures is much more costly than designing them in from the start.
- Building Regulations and Central Government schemes are predominantly the vehicles for change to the existing housing stock.
- There is little scope within the current planning policy framework to require renovation of or upgrade to existing housing stock in local planning policies.



### Car Free Housing policies

- Transport is now the biggest contributor to carbon emissions in the UK and within this sector, passenger cars are by far the biggest contributor.
- It is clear from the Department for Transport's research that a modal shift away from the private passenger car would have the most significant impact in reducing greenhouse gases, such an approach could be encouraged through planning policy
- Norwich City Council and the Borough Council of King's Lynn and West Norfolk have adopted local plan policies that promote car free schemes, subject to location and other criteria.

### Live-work units and working from home

- Live-work units are living accommodation specifically designed to allow you to both live and work within the same unit.
- Home working is where a person carries out part or all of their paid work from home as opposed to a central office.
- Improved technical infrastructure to support home working

### Community led renewable heat and energy networks/schemes

- These schemes tend to be retrofitted to existing communities.
- Do not seem to need a specific policy approach as generic energy policies seem to be adequate.
- Local Plans could support such approaches.

### Communal heat and energy networks/schemes

- This needs to be planned in from the start, can be for cooling and heating and hot water and is usually for larger schemes of over 100.
- Often called District Heating networks or Community heating networks
- Again, the generic renewable/low carbon energy policy will provide general support with other policies assessing impacts on any constraints in the site.
- There could be scope to add a requirement to site-specific policies for larger scale development.

### Electric Vehicles (EVs)

- EVs represent a small, but growing vehicle market share, set against a back-drop of declining sales of internal combustion engine-based vehicles.
- The issue of how far an electric vehicle can go on a single charge and the related issue of where to charge the vehicle when on a journey and how long that charging would take are important considerations in the purchase of EVs. However, government statistics suggest that the overriding public concern is lack of charging infrastructure.
- The UK Government has shown commitment to facilitating the mass-market uptake of EVs through a number of recently published strategies and action plans. This is imperative to facilitate the roll out of charging infrastructure.
- There is a need to apply policy for promoting the wider uptake of EVs and from 2030 solely ICE (Internal Combustion Engine) vehicles will no longer be sold in addition to setting minimum standard that ensure that any new schemes are future-proofed to incorporate improvements and innovations as they develop. The Government may introduce regulations or requirements at



a national level in due course. So, any Local Plan requirement would be in place until national policy or regulations 'take over'.

- Uptake of EVs in Norfolk should be assessed to determine whether supply of provision meets demand.

### Public transport

- The use of public transport over single occupancy car use is an important part of any Climate change initiative. New development will result in additional needs for new residents and it is important that they have access to a good public transport service, this will also benefit existing local residents.
- Smaller developments will have a limited ability to support public transport but should still consider access to public transport and their suitability will be assessed as part of the work to produce a Housing and Economic Land Availability Assessment (HELAA).

### Travel Plans

- The delivery of a travel plan is the result of a transport assessment with developers, with the aim of promoting public transport, walking and cycling, and reducing the need to travel in cars.
- The primary purpose of a Travel Plan (on new developments) is to encourage active travel and healthier lifestyles by the promotion of sustainable travel options, such as walking and cycling, and to reduce unnecessary car use.

### Embodied Energy in Buildings- Existing Housing Stock conversions and extensions

- Embodied energy is the energy consumed by all of the processes associated with the production of a building such as the mining and processing of natural resources and transport and building of the building.
- Effectively there are three areas. The first relates to historic buildings, the second relates to upgrading a building that is being extended and the third relates to demolishing buildings.
- In relation to historic buildings, there is Historic England guidance that could be incorporated into Local Plans.
- In relation to extensions, there are examples of where policies require a 10% improvement to the energy use of the existing building.
- Another area to consider is that of **demolition**:
  - On occasion, developers demolish buildings to make way for new buildings.
  - Of course, some buildings can reasonably be beyond use, but sometimes they can be re-used.
  - From September 2020, a new Class ZA Permitted Development Right will be in place, for the demolition of some buildings and replacement by either a single purpose-built detached block of flats, or a purpose-built detached house.
  - Much of the research points to the fact that refurbishment is far better than demolition with regards greenhouse gas emissions. But the planning relaxation around demolition and the VAT implications for refurbishing older properties seems to support demolition over refurbishment.



### Light pollution

- Light pollution contributes towards climate change by the destruction of nitrate radicals which cleanse our air and only work in the dark and through the wasting of electricity through unnecessary lighting e.g., leaving office lights on overnight.
- Whilst Local Plans tend to refer to light pollution, it is related more to amenity impacts.
- Some areas that protect their dark skies have stronger dark sky/light pollution policies.

### Larger industrial installations/premises

- There are some industrial installations in Norfolk that are identified as significant emitters of greenhouse gases.
- There could be scope to require a reduction in the greenhouse gas emissions of the existing operation as part of any scheme seeking planning permission. There could be site-specific policies for these sites. There may be other sites that could be included in the list.

### Modern Methods of Construction (MMC)

- 'Modern Methods of Construction' (MMC) is a broad term, embracing a range of offsite manufacturing and onsite techniques that provide alternatives to traditional house building, but can speed up the building process and produce energy efficient buildings as a result, such as those exemplified by Passivhaus standards of efficiency.
- Offsite manufacture (characterised by modular and pre-fabricated construction) represents an opportunity to address many issues associated with on-site construction methods, in addition to increasing capacity and investment in the industry.
- Whilst increasing the take up of MMC may lie with the construction industry and the Government, Local Plans could seek the use of MMC.

### Strong/prominent climate change objectives in the Sustainability Appraisal and Local Plan

- Vision and objectives of the Local Plan are what the policies of the Local Plan are based upon.
- These policies are then assessed against sustainability appraisal objectives whereby potential positives are maximised and any negative effects identified mitigated.

### Integrated Constructed Wetlands

- Integrated constructed wetlands or ICWs are a type of sustainable wastewater treatment system that looks and functions like a natural wetland.
- Integrated Constructed Wetlands cleanse wastewater by replicating processes that occurs in natural wetlands.
- Integrated wetlands to deal with waste contribute to greater biodiversity net gain.
- The plants in the wetland reduce N2O and CH4 levels and clean water of nitrates.
- One of the products from the natural process is CO2 emissions, however if microbial fuel cells are added to the Integrated wetlands not only do they produce energy, but they reduce these CO2 emissions considerably.

### Building for a healthy life

- Building for a Healthy Life aims to help people create better places to live and to be an industry standard for design.
- It is a toolkit that is often referred to in Local Plans. Building for Life 12 was focussed on place making.



- The updated version extends that to have a health-related focus, so not specifically related to climate change.
- It is important to remember that through good and healthy place making, many issues relating to climate change are addressed as well. For example, Building for a Healthy Life recognises the following which are also related to climate change:
  - Responding to pedestrian desire lines – promoting walking and cycling
  - Improving public transport provision and connectivity
  - Protecting habitats – helping biodiversity adapt to climate change

### Peat

- Peat has many special qualities, but the one relevant to the climate change work stream, is that peat is a carbon sink. If peat degrades or dries out, it becomes a carbon source.
- Peat soils release stored carbon if they are drained and allowed to dry out. The protection of peat soils is therefore critical to help address climate change.
- There are areas of peat in Norfolk.

### Water usage of residential developments

- Fundamentally, the more water used by a development, the more energy is used, with associated greenhouse gas emissions.
- There is the potential for Local Plans to set a water usage standard of 110 litres per person per day, which is better than current building regulations.
- **There is a section in the NSPF that addresses water usage for new developments.**

### Broadband and 5G

- Working from home, on-line shopping and communicating with others through the internet reduces the need to travel, with fewer greenhouse gas emissions as a result. There is strong evidence that shifting consumer patterns are now becoming more fixed around online shopping. Therefore, given...
- ...some areas in Norfolk do not have good access to broadband. New development needs to make sure that the facilities are in place to enable new occupiers to be digitally ready, including the necessary communications/phone infrastructure to facilitate the rollout of improved broadband (and 5G access in due course).
- **There is a section in the NSPF that addresses broadband and 5G roll out.**

### Biodiversity

- A changing climate will affect biodiversity. That being said, ways of mitigating and adapting to climate change could benefit biodiversity. Indeed, ways of sequestering greenhouse gases, such as planting trees, will also benefit biodiversity. Biodiversity 'Net Gain' will be an established part of the planning process, once current legislation, going through the system, is fully enacted.



## Appendix 4 - Changes to NSPF version 3 since the January 2021 Member Forum

At the member forum in January it was highlighted that we were working to bring the MMO on board as a signatory, subsequently they requested some minor wording changes to ensure the NSPF fits with their work in producing marine plans. The changes include minor wording changes to the agreements to ensure there was consistency in who they apply to. New wording in section 3 to better define the process for marine plans and additional strategic cross boundary issue areas within agreement 27.

The member forum also requested further work to be completed around the GI RAMS study so the NSPF has been updated to highlight that this work is still on-going.

All changes made since the member forum:

- Minor inconsistencies around the used of 'Norfolk Authorities' and 'the Authorities' etc. have been updated in the agreements to ensure it is clear who the agreement relates to.
- In section 1.4 wording has been included to highlight that the signatories undertake their statutory duties in accordance with relevant legislation, policy and guidance; and in the context of other relevant Statements of Common Ground, Memoranda of Understanding and Position Statements which they are party to.
- Updated wording in section 3 to highlight the process followed for marine plans and their application.
- An addition to the environmental objective of 'Leaving the environment in a better state for future generations.'
- Reference to the UK Government and offshore wind industry agreed Sector Deal
- Reference to the government's December 2020 announcement of a new plan which aims for at least a 68% reduction in greenhouse gas emissions by the end of the decade.
- Reference to the East Anglia Coastal Group's role in producing Shoreline Management Plans.
- In Agreement, 27 additional areas where added as strategic cross boundary issues.
- Changes in the GI section to highlight the on-going work of the GI RAMS study.
- Minor change to the Minerals and Waste section noting that marine minerals do not contribute significantly to Norfolk's mineral provision and that Norfolk County Council does not determine planning applications for marine aggregates and they do not form part of the Minerals and Waste Local Plan.
- MMO included in Agreement 19.



- Two additional sentences at the start of the third paragraph on page 16 to add some context for the Marine Plan.



# Planning Committee

05 March 2021

Agenda item number 13

## Local Plan for the Broads- review

Report by Planning Policy Officer

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### Summary

This report introduces the start of review of the Local Plan for the Broads. It sets out the likely steps and talks generally about producing local plans. This report is for information and discussion.

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### Contents

1.	Introduction	1
2.	Why are we reviewing the Local Plan?	2
3.	How do you review a Local Plan? How do you produce a Local Plan?	2
4.	What is the timeline for producing the Local Plan? How long will it be until the Local Plan is submitted?	3
5.	What about the pandemic? What about the changes to the planning system that have been proposed?	3
6.	What kind of evidence will we need to produce? How much will the review cost?	4
7.	Who will produce the Local Plan?	4
8.	How will Members of Navigation Committee, Planning Committee and Broads Authority be involved?	4
9.	But what about the White Paper? What if the planning system changes? Should we wait a while?	5
10.	What role do our District and County Councils have in producing the Local Plan?	5
11.	Next Steps	5

### 1. Introduction

- 1.1. The Local Plan for the Broads was adopted in May 2019. This report introduces the review of the adopted Local Plan and answers potential questions that may arise about reviewing it. Any queries, observations or questions from Members are welcomed.



## 2. Why are we reviewing the Local Plan?

### 2.1. There are a few reasons why we are starting to review the Local Plan:

- a) We commit, in the current Local Plan, to start to review it around 18 months after adoption. Eighteen months after May 2019 adoption was around November 2020. Background work started internally in November, such as project planning and scoping.
- b) The Local Plan for the Broads 2019 was produced in line with and examined against the 2012 NPPF. At around the time the final draft of the Local Plan was being consulted on/submitted/examined, a new version of the NPPF (2018 and then 2019) was released. This included transition arrangements for advanced Local Plans, such as that for the Broads, which permitted examination against the 'old' 2012 NPPF. It is prudent to now start to review the Local Plan, noting that a new NPPF may well be put in place over the coming years.
- c) Given that the final drafting of the current Local Plan was at the end of 2017 (submitted early 2018, examined from mid-2018 and adopted May 2019), some of the issues that are addressed in the Local Plan, such as climate change, have moved on. Again, it is prudent to start to review the Local Plan to ensure it is as up to date as possible.

## 3. How do you review a Local Plan? How do you produce a Local Plan?

3.1. To date, we have completed project planning to get an idea of the timeline and steps needed. The Local Development Scheme (LDS) sets out the tasks and timeline. An update of the LDS will come to a future Planning Committee for endorsement.

3.2. Generally, however, these are the steps to reviewing/producing a Local Plan.

- Update the Local Development Scheme
- Update the Statement of Community Involvement
- Prepare Sustainability Appraisal Scoping Report and undertake technical consultation with certain stakeholders
- Review vision, objectives and policies
- Consider issues in the area and identify options to address these. Produce an 'Issues and Options' version of the Local Plan. Consult on this version.
- Undertake call for sites for residential moorings and housing – if required.
- Produce evidence base as required.
- Start to produce policies – this is the 'Preferred Options' version of the Local Plan. Produce Sustainability Appraisal. Produce Habitats Regulation Assessment. Consult on this version.



- Amend and finalise policies – this is the ‘Publication’ version of the Local Plan. Produce Sustainability Appraisal. Produce Habitats Regulation Assessment. Consult on this version.
- If still content with policies after assessing feedback on the Local Plan, submit to Planning Inspector.
- Examination, including consultations as required.
- Adopt and monitor.

#### 4. What is the timeline for producing the Local Plan? How long will it be until the Local Plan is submitted?

- 4.1. The LDS, which sets out the stages and timings for the Local Plan, will come to a future Planning Committee for endorsement. But, generally, it is envisaged that it could take around 4 years to get to a submitted Local Plan.

#### 5. What about the pandemic? What about the changes to the planning system that have been proposed?

- 5.1. In terms of producing the Local Plan, the pandemic does not have a significant impact. We are now well versed at working from home and holding meetings over the internet.
- 5.2. Turning to the consultations, whilst it is regrettable that we are not able to hold public meetings or drop in sessions in person, the Government instruction is clear in that we need to carry on with producing Local Plans. Indeed, since March 2020 the Broads Authority has held consultations and received many responses and much useful feedback despite the lack of face to face meetings. In terms of hard copies of consultation documents, we can print off and post them to those who request them.
- 5.3. The planning system is set to change quite a lot over the coming years. The White Paper (2020) discussed many proposals for Local Plans, some of which are significant, however no further detail has been provided and there is no clear timescale for when these changes might come forward. The Government’s Chief Planner is clear, in the meantime, that work on Local Plans should continue and this has been reiterated by the Minister of State for Housing<sup>1</sup>. As and when regulations change regarding Local Plans, we will respond to these to ensure the Local Plan is produced to meet regulations in place at the time. That being said, there will be situations where we can ‘future proof’ the Local Plan and one particular area could be the digitisation of planning and Local Plans. Working with our IT and Communications Teams, we will try to ensure that the new Local Plan and how it is presented take advantage of modern technology.

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<sup>1</sup> [Written statements - Written questions, answers and statements - UK Parliament](#)



- 5.4. To summarise, in terms of the pandemic and the changes to the planning system, the message is to keep on going.

## **6. What kind of evidence will we need to produce? How much will the review cost?**

- 6.1. Some evidence will be able to be completed in house; other evidence will probably need be provided by external contractors. Examples of evidence and studies that we will need are as follows. This list is not exhaustive. It may be that we jointly commission the work with other teams in the Authority or other Local Planning Authorities.
- Habitats Regulation Assessment
  - Housing Need
  - Gypsy and Traveller, Travelling Show People Need
  - Residential Moorings Need
  - Viability Assessment
  - Strategic Flood Risk Assessment
- 6.2. The cost of producing the Local Plan is mostly officers' time. The examination of the Local Plan could be in the region of £50,000 to £70,000.

## **7. Who will produce the Local Plan?**

- 7.1. The Local Plan will be produced by the Planning Policy Officer. The Head of Planning and Director of Strategic Services will be heavily involved in its production as well. Development Management Officers will have a key role to play, as it is those officers that will implement and deliver the Local Plan policies when it is adopted. Our in-house topic experts will also help with policies that are relevant to their topic area such as ecology, access and navigation. We will also use consultants as needed, for example, to help calculate our housing need and to assess the viability of the Local Plan.

## **8. How will Members of Navigation Committee, Planning Committee and Broads Authority be involved?**

- 8.1. Member involvement and engagement is key.
- 8.2. Any part of the Local Plan that is relevant to navigation will be presented to Navigation Committee for discussion and comment. Comments will be fed back to Planning Committee.
- 8.3. For the current Local Plan, bite size pieces of the emerging Local Plan were brought to Planning Committee for discussion. This approach worked well and was welcomed by the Members at the time. This same approach is proposed for the new Local Plan. We will try to ensure a constant flow of items, in manageable bite size pieces. Then, when



consultation needs to be approved, the entire document will be presented to Planning Committee for discussion, comment and approval. Comments received as part of these consultation stages will then be reported back to Planning Committee.

- 8.4. There may be occasions where it is recommended that endorsement of certain stages of the Local Plan are delegated to an officer, such as the Director of Strategic Services, in consultation with the Chair of Planning Committee and the Chair of Broads Authority, in the interest of expediency.
- 8.5. When a consultation needs to be approved, following the Planning Committee's endorsement, the document will be presented to Broads Authority for final endorsement for consultation. At the end of the process, the Local Plan would be adopted by resolution of Broads Authority.

## **9. But what about the White Paper? What if the planning system changes? Should we wait a while?**

- 9.1. The planning system will probably change over the next few years, given the messages coming from Government. There is no set timetable for the changes taking place, so how long should we wait? And what changes are we waiting for? Not all of the White Paper changes may come to fruition. Also, as set out above, time moves on and policies can get out of date or not be based on the most up to date evidence. Importantly, the message from Government is to keep going. We are therefore expected to, and it is prudent to, keep going with producing the Local Plan.

## **10. What role do our District and County Councils have in producing the Local Plan?**

- 10.1. We need to work with our six District and two County Councils. Not only because the Duty to Cooperate requires us to, but because they undertake services for our residents (for example minerals and waste planning, housing services) and also because it is good planning. One particular topic area that we will need to work with the districts on, is housing, including housing numbers and affordable housing. So, we will work closely with colleagues from the eight councils to ensure the Local Plan is as good as it can be. There are already fora in place that enable this working (for example, both Norfolk and Suffolk LPAs meet regularly and there is a regular meeting of Great Yarmouth Borough Council, East Suffolk Council and the Broads Authority).

## **11. Next Steps**

- 11.1. The next three stages of producing the Local Plan are producing and then consulting on a Sustainability Appraisal Scoping Report, updating the Local Development Scheme and also checking and updating the Statement of Community Involvement as required.



Author: Natalie Beal

Date of report: 22 February 2021



# Planning Committee

05 March 2021

Agenda item number 14

## Review of Scheme of delegated powers to officers

Report by Director of Strategic Services

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### Summary

Officers are proposing some changes to the planning section of the Scheme of powers delegated to officers, as part of a wider update of the Scheme.

### Recommendation

To endorse the draft changes to the planning section of the Scheme and recommend it to the Broads Authority for approval.

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## Contents

1. Introduction	1
2. Proposed changes to the planning section	2
3. Financial implications	3
4. Conclusion	3
Appendix 1 - Proposed changes to the planning part of the Scheme of Delegated Powers (clean version)	4
Appendix 2 - Proposed changes to the planning part of the Scheme of Delegated Powers (in track change)	10

## 1. Introduction

- 1.1. The [‘Scheme of powers delegated to officers’](#) (‘the Scheme’) is an important constitutional document. Its purpose is to ensure that officers are empowered to make decisions and take appropriate action in a timely and efficient manner. Section E, starting on page 5, relates to planning. The May 2019 Scheme is the current version and should be read in conjunction with the ‘Powers delegated to Chief Executive – arrangements for the exercise of powers by other officers’ (October 2018).
- 1.2. Officers have reviewed the scheme and would like to propose some changes to make it easier to understand and to update relevant sections. The two documents referred to



in 1.1. have been amalgamated into a single document in the revised draft Scheme. The details of the proposed changes relevant to planning and their rationale are detailed in section 2.

## 2. Proposed changes to the planning section

- 2.1. Some additional information and updates have been included in the delegation tables, including updates to the 'Other authorised officers' column (currently Appendix 1 in the 2018 scheme) to clarify which officers are authorised to carry out the specified tasks.
- 2.2. Officers propose a change on the applications which could be delegated to officers when representations are received. This applies to (37) (iv) and (37) (v), where the following additional wording is proposed: "and it is proposed to grant planning permission". At the moment, a decision needs to be made by Planning Committee when representations are received in respect of any proposed development within the 21-day period for consultation where these raise material planning considerations of significant weight, whether or not it is proposed to grant permission. The change would enable officers to determine applications under delegated powers where it is proposed to refuse planning permission. Applications where it is proposed to grant planning permission would continue to be determined by the Planning Committee.
- 2.3. There are changes which update the latest relevant regulations. For example, the "Town and Country Planning (General Development Management Procedure) Order 2010" is replaced by the "Town and Country Planning (Development Management Procedure) (England) Order 2015".
- 2.4. References to documents which are no longer used are removed. For example, references to the Local Development Framework are deleted.
- 2.5. Reference to Section 215 Notices has been added to (46), as this was missing.
- 2.6. A section on conservation areas has been added at (48), as this was missing.
- 2.7. Officers propose to add a level of precision to the section on Tree Preservation Orders. This applies to (49) where the following wording is proposed to be added: "where no objection in writing to the provisional Order has been received" in place of "non-controversial".
- 2.8. A section on heritage is proposed to be added at (62) as: "To make recommendations to Historic England on buildings worthy of inclusion on the national list of buildings of historical or special interest."
- 2.9. A section on planning policy is proposed to be added at (63) as: "To respond to consultations on planning policy documents in respect of land outside the Authority's Executive Area, subject to consideration by the Planning Committee of those documents that have serious implications for the Broads."



- 2.10. Some changes throughout the document are proposed to improve the wording and make it easier to understand.
- 2.11. The order of the sections has been reviewed, to make the flow of the text easier to follow and to group together similar areas of work.
- 2.12. The numbering of the bullet points, starting at (37), follows the numbering in the amended Scheme, and may be subject to changes as necessary.

### **3. Financial implications**

- 3.1. It is in the public interest for the Broads Authority as a local planning authority to have effective delegation arrangements in place to ensure that decisions on planning applications are made in a timely manner.

### **4. Conclusion**

- 4.1. The full revised scheme of powers delegated to officers will need to be decided by the Broads Authority at a future meeting, where Planning Committee comments will be provided.

Author: Marie-Pierre Tighe

Date of report: 15 February 2021

Appendix 1 – Proposed changes to the planning part of the Scheme of Delegated Powers (clean version)

Appendix 2 – Proposed changes to the planning part of the Scheme of Delegated Powers (in track change)



# Appendix 1 - Proposed changes to the planning part of the Scheme of Delegated Powers (clean version)

## Planning and heritage

Where reference is made to 'Planning Team', it includes the following roles: Planning Policy Officer, Senior Planning Officer, Planning Officer, Planning Assistant, Historic Environment Manager, Planning Officer (Heritage), Planning Officer (Compliance and Implementation), planning administration team.

Powers delegated to Chief Executive	Other authorised officers
<p>(37) All planning applications<sup>1</sup> are considered to fall within the delegation scheme and will be determined by officers, unless:</p> <ul style="list-style-type: none"> <li>(i) it is for a major development as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015;</li> <li>(ii) the application represents a departure from the development plan policies, including the Broads Local Plan and any relevant policy adopted by the Authority, and it is proposed to grant planning permission;</li> <li>(iii) objections are received from any statutory consultee (excluding parish councils) in respect of any proposed development within the 21-day period for consultation, and it is proposed to grant planning permission;</li> <li>(iv) representations are received in writing from parish councils in respect of any proposed development within the 21-day period for consultation where these raise material planning considerations of significant weight, and it is proposed to grant planning permission;</li> <li>(v) representations are received in writing from other persons in respect of any proposed development within the 21-day period for consultation where these raise material planning considerations of</li> </ul>	<p>Director of Strategic Services or Head of Planning or Senior Planning Officer</p>

<sup>1</sup> The applications and notification shall include planning permission, approval of reserved matters, advertisement consent, listed building consent, conservation area consent submitted under the Town and Country Planning (General Permitted Development) Order 1995 and consent under the Hazardous Substances regulations. ©



Powers delegated to Chief Executive	Other authorised officers
<p>significant weight, and it is proposed to grant planning permission;</p> <p>(vi) any member of the Authority requests, within 21 days of receipt of the schedule of planning applications, that the application is placed before the Planning Committee for a decision, and provides a material planning reason of significant weight for that request in writing;</p> <p>(vii) the Ward member of the relevant District Council requests, within 21 days of receipt of the schedule of planning applications, that the application is placed before the Planning Committee for a decision, and provides a material planning reason of significant weight for that request in writing;</p> <p>(viii) the Director of Strategic Services considers the matter ought more appropriately to be referred to the Planning Committee for a decision;</p> <p>(ix) any Authority member (including co-opted members of the Navigation Committee) or Authority officer is involved in the application.</p>	
<p>(38) In respect of planning applications:</p> <p>(i) to sign and issue the formal decision notices on planning matters that have been before the Planning Committee or determined under delegated powers;</p> <p>(ii) to impose detailed conditions on planning permissions granted by the Authority (including deemed permissions);</p> <p>(iii) to determine the appropriate grounds where permission is either refused or approved;</p> <p>(iv) to refuse a planning application, if within six months of any decision to enter into a Section 106 Agreement by Committee that Agreement has not been signed;</p> <p>(v) to settle the terms of Section 106 Agreements required in connection with planning applications, including amendments to existing Section 106 agreements.</p>	<p>Director of Strategic Services or Head of Planning or Senior Planning Officer</p>



<b>Powers delegated to Chief Executive</b>	<b>Other authorised officers</b>
(39) To approve details submitted in accordance with a condition of a planning consent.	Director of Strategic Services or Head of Planning or Senior Planning Officer
(40) To determine reasons for decisions.	Director of Strategic Services or Head of Planning or Senior Planning Officer
(41) To formally discharge planning conditions upon compliance.	Director of Strategic Services or Head of Planning or Senior Planning Officer
(42) In respect of non-material amendments to planning applications:  (i) to define in individual cases what constitutes a non-material amendment; and  (ii) to determine applications for non-material amendments except in cases that fall within paragraph 37 (ix) of this scheme.	In respect of (i), Head of Planning or member of Planning Team  In respect of (ii), Director of Strategic Services or Head of Planning or Senior Planning Officer
(43) In respect of Prior Approval applications, to exercise the power available to the Authority with regard to the siting, design and external appearance and all other matters.	Director of Strategic Services or Head of Planning or Senior Planning Officer
(44) To determine which planning applications should be referred to the Navigation Committee for consultation, in accordance with Section 9 (6) (a) (iv) of the Norfolk and Suffolk Broads Act 1988.	Director of Strategic Services or Head of Planning or Senior Planning Officer
(45) In respect of applications for a Lawful Development Certificate (Existing or Proposed):  (i) to consider and determine the application on the facts presented, subject to consultation with the Authority's solicitor in complex cases or where the evidence is not clear; and  (ii) to sign and issue the formal decision.	Director of Strategic Services or Head of Planning or Senior Planning Officer



Powers delegated to Chief Executive	Other authorised officers
(46) To serve Breach of Condition Notices, Planning Contravention Notices, Section 330 Notices and Section 215 Notices.	Director of Strategic Services or Head of Planning or Planning Officer (Compliance and Implementation)
(47) In cases of urgency and subject to consultation (if possible) with the Chair, or in the absence of the Chair the Vice-Chair, of the Planning Committee:  (i) to serve Building Preservation Notices;  (ii) to issue Listed Building Enforcement Notices and Conservation Area Enforcement Notices;  (iii) to issue Enforcement Notices, Stop Notices and Temporary Stop Notices;  (iv) to take enforcement action in respect of unauthorised advertisements.	Director of Strategic Services, or: · in respect of (i) and (ii), Historic Environment Manager or Head of Planning · in respect of (iii) and (iv), Head of Planning
(48) In respect of Conservation Areas:  (i) to agree the scope of a Conservation Area reappraisal (existing) or appraisal (new) with the relevant District Council;  (ii) to undertake an assessment of an existing Conservation Area and prepare a draft reappraisal for consultation; and  (iii) to identify areas suitable for Conservation Area designation and prepare a draft appraisal for consultation.	Director of Strategic Services or Head of Planning or Historic Environment Manager
(49) In respect of Tree Preservation Orders:  (i) to make and serve Tree Preservation Orders;  (ii) to confirm Tree Preservation Orders where no objection in writing to the provisional Order has been received.	Director of Strategic Services or Head of Planning or Historic Environment Manager
(50) (i) To deal with applications to lop, top and fell trees in Conservation Areas.  (ii) To determine applications to lop, top or fell trees within Tree Preservation Orders or Groups.	Director of Strategic Services or Head of Planning or



Powers delegated to Chief Executive	Other authorised officers
	Historic Environment Manager
(51) To implement the Hedgerow Regulations 1997 in authorising rights of entry, administrative consultation arrangements and the use of outside assistance.	Director of Strategic Services or Head of Planning or Historic Environment Manager
(52) To comment on non-controversial felling licence applications and broadleaved woodland grant schemes.	Director of Strategic Services or Head of Planning or Historic Environment Manager
(53) To respond to consultations from the Forestry Commission on applications for grants and Forestry Grant Schemes in relation to areas up to 10 hectares.	Director of Strategic Services or Head of Planning or Historic Environment Manager
(54) To give observations in respect of development by other authorities, government departments and statutory undertakers, subject to consideration by the Planning Committee of those applications that have serious implications for the Broads.	Director of Strategic Services or Head of Planning or Senior Planning Officer or Historic Environment Manager
(55) To submit observations on environmental issues and to lodge holding objections in respect of applications for Goods Vehicle Operators Licences.	Director of Strategic Services or Historic Environment Manager or Head of Planning
(56) To reply to consultation on certified sites for camping and caravanning and for caravan and tent rally sites.	Director of Strategic Services or Head of Planning or member of Planning Team
(57) To determine whether an environmental impact assessment is required, and to agree the scope of any environmental statement under the Environmental Impact Regulations 2017.	Director of Strategic Services or Head of Planning or Senior Planning Officer
(58) To determine whether applications are likely to have a significant effect on a European Site, following	Director of Strategic Services or Head of



<b>Powers delegated to Chief Executive</b>	<b>Other authorised officers</b>
consultation with Natural England, under the terms of the Conservation (Natural Habitats Etc) Regulations 1994.	Planning, in consultation with Environment Policy Adviser
(59) To respond to consultations on planning applications in respect of land outside the Authority's Executive Area, subject to consideration by the Planning Committee of those applications that have serious implications for the Broads.	Director of Strategic Services or Head of Planning or Senior Planning Officer
(60) In respect of applications that are located across the boundary of the Authority's area and partly in the area of the adjacent LPA: <ul style="list-style-type: none"> <li>(i) to consider and decide whether the application should be dealt with by one or both LPAs; and</li> <li>(ii) to delegate to the adjacent LPA where appropriate; or</li> <li>(iii) to determine the applications on behalf of both LPAs.</li> </ul>	Head of Planning or member of Planning Team
(61) To fulfil the Authority's role as a Competent Authority with regard to consideration of development proposals affecting Special Protection Areas and Special Areas of Conservation in the Broads, including the determination of Appropriate Assessments.	Director of Strategic Services or Head of Planning, in consultation with Environment Policy Adviser
(62) To make recommendations to Historic England on buildings worthy of inclusion on the national list of buildings of historical or special interest.	Director of Strategic Services or Head of Planning or Historic Environment Manager
(63) To respond to consultations on planning policy documents in respect of land outside the Authority's Executive Area, subject to consideration by the Planning Committee of those documents that have serious implications for the Broads.	Director of Strategic Services or Head of Planning or Planning Policy Officer



## Appendix 2 - Proposed changes to the planning part of the Scheme of Delegated Powers (in track change)

2(e) Planning and heritage

Where reference is made to 'Planning Team', it includes the following roles: Planning Policy Officer, Senior Planning Officer, Planning Officer, Planning Assistant, Historic Environment Manager, Planning Officer (Heritage), Planning Officer (Compliance and Implementation), planning administration team.

Powers delegated to Chief Executive	Other authorised officers
<p>(37) All planning applications<sup>2</sup> are considered to fall within the delegation scheme and will be determined by officers, unless:</p> <p>(x) it is for a major development as defined in the Town and Country Planning (<del>General</del> Development Management Procedure) <u>(England)</u> Order 2015<del>0</del>;</p> <p>(xi) the application represents a departure from the development plan policies, including the Broads Local Plan/<del>Local Development Framework</del> and any relevant policy adopted by the Authority, and it is proposed to grant planning permission;</p> <p>(xii) objections are received from any statutory consultee (excluding parish councils) in respect of any proposed development within the 21-day period for consultation, and it is proposed to grant planning permission;</p> <p>(xiii) representations are received in writing from parish councils in respect of any proposed development within the 21-day period for consultation where these raise material planning considerations of significant weight, <u>and it is proposed to grant planning permission</u>;</p> <p>(xiv) representations are received in writing from other persons in respect of any proposed development within the 21-day period for consultation where these raise material planning considerations of</p>	<p><u>Director of Strategic Services or Head of Planning or Senior Planning Officer</u></p>

<sup>2</sup> The applications and notification shall include planning permission, approval of reserved matters, advertisement consent, listed building consent, conservation area consent, ~~prior approval applications~~ submitted under The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended the Town and Country Planning (General Permitted Development) Order 1995 and consent under the Hazardous Substances regulations. @



Powers delegated to Chief Executive	Other authorised officers
<p>significant weight, <u>and it is proposed to grant planning permission</u>;</p> <p>(xv) any member of the Authority requests, within 21 days of receipt of the schedule of planning applications, that the application is placed before the Planning Committee for a decision, and provides a material planning reason of significant weight for that request in writing;</p> <p>(xvi) the Ward member of the relevant District Council requests, within 21 days of receipt of the schedule of planning applications, that the application is placed before the Planning Committee for a decision, and provides a material planning reason of significant weight for that request in writing;</p> <p>(xvii) the Director of Strategic Services considers <del>that</del> the matter ought more appropriately to be referred to the <u>Planning</u> Committee for a decision;</p> <p>(xviii) any <u>Authority</u> member <del>or member of staff of the Authority,</del> (including co-opted members of the Navigation Committee) <u>or Authority officer</u> is involved in the application.</p>	
<p><u>(38) In respect of planning applications:</u></p> <p><u>(vi) to sign and issue the formal decision notices on planning matters <del>that</del> have been before the Planning Committee or determined under delegated powers;</u></p> <p><u>(vii) to impose detailed conditions on planning permissions granted by the Authority (including deemed permissions);</u></p> <p><u>(viii) to determine the appropriate grounds where permission is either refused or approved;</u></p> <p><u>(ix) to refuse a planning application, if within six months of any decision to enter into a Section 106 Agreement by Committee that Agreement has not been signed;</u></p> <p><u>(x) to settle the terms of Section 106 Agreements required in connection with planning applications, including amendments to existing Section 106 agreements.</u></p>	<p><u>Director of Strategic Services or</u>  <u>Head of Planning or</u>  <u>Senior Planning Officer</u></p>



<b>Powers delegated to Chief Executive</b>	<b>Other authorised officers</b>
<del>(38)</del> (39) To approve details submitted in accordance with a condition of a planning consent.	<u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Senior Planning Officer</u>
<del>(39)</del> (40) To determine reasons for decisions.	<u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Senior Planning Officer</u>
<del>(40)</del> (41) To formally discharge planning conditions upon compliance.	<u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Senior Planning Officer</u>
<u>(42) In respect of non-material amendments to planning applications:</u> <u>(iii) to define in individual cases what constitutes a non-material amendment; and</u> <u>(iv) to determine applications for non-material amendments except in cases that fall within paragraph 37 (ix) of this scheme.</u>	<u>In respect of (i), Head of Planning or member of Planning Team</u> <u>In respect of (ii), Director of Strategic Services or</u> <u>Head of Planning or Senior Planning Officer</u>
<u>(43) In respect of Prior Approval applications, to exercise the power available to the Authority with regard to the siting, design and external appearance and all other matters.</u>	<u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Senior Planning Officer</u>
<u>(44) To determine which planning applications should be referred to the Navigation Committee for consultation, in accordance with Section 9 (6) (a) (iv) of the Norfolk and Suffolk Broads Act 1988.</u>	<u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Senior Planning Officer</u>
<u>(45) In respect of applications for a Lawful Development Certificate (Existing or Proposed):</u> <u>(iii) to consider and determine the application on the facts presented, subject to consultation with the Authority's solicitor in complex cases or where the evidence is not clear; and</u> <u>(iv) to sign and issue the formal decision.</u>	<u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Senior Planning Officer</u>



Powers delegated to Chief Executive	Other authorised officers
<p><del>(41)</del>(46) To serve Breach of Condition Notices, Planning Contravention Notices, <del>and</del> Section 330 Notices <u>and Section 215 Notices</u>.</p>	<p><u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Planning Officer</u> <u>(Compliance and Implementation)</u></p>
<p><del>(42)</del>(47) In cases of urgency and subject to consultation (if possible) with the Chair, or in the absence of the Chair the Vice-Chair, of the Planning Committee:</p> <ul style="list-style-type: none"> <li>(v) to serve Building Preservation Notices;</li> <li>(vi) to issue Listed Building Enforcement Notices and Conservation Area Enforcement Notices;</li> <li>(vii) to issue Enforcement Notices, Stop Notices and Temporary Stop Notices;</li> <li>(viii) to take enforcement action in respect of unauthorised advertisements.</li> </ul>	<p><u>Director of Strategic Services or:</u> <u>-or</u> <u>Senior Planning Officer</u> <u>· in respect of (i) and (ii),</u> <u>Historic Environment</u> <u>Officer or Head of</u> <u>Planning</u> <u>· in respect of (iii) and (iv),</u> <u>Head of Planning</u></p>
<p><u>(48) In respect of Conservation Areas:</u></p> <ul style="list-style-type: none"> <li><u>(iv) to agree the scope of a Conservation Area reappraisal (existing) or appraisal (new) with the relevant District Council;</u></li> <li><u>(v) to undertake an assessment of an existing Conservation Area and prepare a draft reappraisal for consultation; and</u></li> <li><u>(vi) to identify areas suitable for Conservation Area designation and prepare a draft appraisal for consultation.</u></li> </ul>	<p><u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Historic Environment</u> <u>Manager</u></p>
<p><u>(49) In respect of Tree Preservation Orders:</u></p> <ul style="list-style-type: none"> <li>(iii) <del>t</del>To make and serve Tree Preservation Orders;</li> <li>(iv) to, <del>and</del> confirm <del>non-controversial</del> Tree Preservation Orders <u>where no objection in writing to the provisional Order has been received.</u></li> </ul>	<p><u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Historic Environment</u> <u>Manager</u></p>
<p><u>(50) (i) To deal with applications to lop, top and fell trees in Conservation Areas.</u></p>	<p><u>Director of Strategic Services or</u> <u>Head of Planning or</u></p>



Powers delegated to Chief Executive	Other authorised officers
<u>(ii) To determine applications to lop, top or fell trees within Tree Preservation Orders or Groups.</u>	<u>Historic Environment Manager</u>
<u>(51) To implement the Hedgerow Regulations 1997 in authorising rights of entry, administrative consultation arrangements and the use of outside assistance.</u>	<u>Director of Strategic Services or Head of Planning or Historic Environment Manager</u>
<u>(43)(52) To comment on non-controversial felling licence applications and broadleaved woodland grant schemes.</u>	<u>Director of Strategic Services or Head of Planning or Historic Environment Manager</u>
<u>(44)(53) To <del>make observations to respond to consultations from</del> the Forestry Commission on applications for grants and Forestry Grant Schemes <del>and consultations over dedication schemes and the Commission's own new planting proposals</del> in relation to areas up to 10 hectares.</u>	<u>Director of Strategic Services or Head of Planning or Historic Environment Manager</u>
<u>(54) To give observations in respect of development by other authorities, government departments and statutory undertakers, subject to consideration by the Planning Committee of those applications that have serious implications for the Broads.</u>	<u>Director of Strategic Services or Head of Planning or Senior Planning Officer or Historic Environment Manager</u>
<del>To deal with notices to lop, top and fell trees in conservation areas.</del>	
<del>To determine applications to lop, top and fell trees protected by Tree Preservation Orders or Groups.</del>	
<u>(45)(55) To submit observations on environmental issues and to lodge holding objections in respect of applications for Goods Vehicle Operators Licences.</u>	<u>Director of Strategic Services or Head of Planning or Historic Environment Manager</u>
<u>(46)(56) To reply to consultation on certified sites for camping and caravanning and for caravan and tent rally sites.</u>	<u>Director of Strategic Services or Head of Planning or member of Planning Team</u>



Powers delegated to Chief Executive	Other authorised officers
<p><del>(47) In respect of planning applications:</del></p> <ul style="list-style-type: none"> <li><del>(i) to sign and issue the formal decision notices on planning matters which have been before the Planning Committee or determined under delegated powers.</del></li> <li><del>(ii) to impose detailed conditions on planning permissions granted by the Authority (including deemed permissions).</del></li> <li><del>(iii) to determine the appropriate grounds where permission is either refused or approved.</del></li> <li><del>(iv)(i) to refuse a planning application, if within six months of any decision to enter into a Section 106 Agreement by Committee, that Agreement has not been signed.</del></li> </ul>	
<p><del>To determine which planning applications should be referred to the Navigation Committee for consultation in accordance with Section 9 (6)(a)(iv) of the Norfolk and Suffolk Broads Act 1988.</del></p>	
<p><del>(48)(57)</del> To determine whether an environmental impact assessment is required, and to agree the scope of any environmental statement under the Environmental Impact Regulations <del>1999</del>2017.</p>	<p><u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Senior Planning Officer</u></p>
<p><del>To determine whether to exercise the discretionary power available to the Authority with regard to the siting, design and external appearance of agricultural and forestry buildings and the siting and means of construction of private roads for agricultural and forestry purposes.</del></p>	
<p><del>(49)(58)</del> To determine whether applications are likely to have a significant effect on a European Site, following consultation with Natural England, under the terms of the Conservation (Natural Habitats Etc) Regulations 1994.</p>	<p><u>Director of Strategic Services or</u> <u>Head of Planning, in consultation with</u> <u>Environment Policy Adviser</u></p>
<p><del>To implement the Hedgerow Regulations 1997 in authorising rights of entry, administrative consultation arrangements and the use of outside assistance.</del></p>	



Powers delegated to Chief Executive	Other authorised officers
<del>To give observations in respect of development by other authorities, government departments and statutory undertakers where there are no outstanding objections which cannot be met within the terms of the observations.</del>	
<del>To determine Forestry Grant applications up to £5,000.</del>	
(59) To respond to consultations on planning applications in respect of land outside the Authority's Executive Area, subject to consideration by the Planning Committee of those applications that have serious implications for the Broads, <del>either in landscape or environmental terms.</del>	<u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Senior Planning Officer</u>
(60) In respect of applications <u>that are located across the boundary of the Authority's area and partly in the area of the adjacent LPA:</u>  <u>(iv) to consider and decide whether the application should be dealt with by one or both LPAs; and</u>  <u>(v) to delegate to the adjacent LPA where appropriate; or</u>  <u>(vi) to determine the applications on behalf of both LPAs.</u>	<u>Head of Planning or</u> <u>member of Planning Team</u>
(61) To fulfil the Authority's role as a Competent Authority with regard to consideration of development proposals affecting Special Protection Areas and Special Areas of Conservation in the Broads, including the determination of Appropriate Assessments.	<u>Director of Strategic Services or</u> <u>Head of Planning, in</u> <u>consultation with</u> <u>Environment Policy Adviser</u>
<del>(52) In respect of non-material amendments to planning applications:</del>  <del>(i) to define in individual cases that constitutes a non-material amendments; and</del>  <del>(ii)(i) to determine applications for non-material amendments except in cases that fall within paragraph 37(ix) of this Scheme.</del>	



Powers delegated to Chief Executive	Other authorised officers
<del>To settle the terms of Section 106 Agreements required in connection with planning applications, including amendments to existing Section 106 Agreements.</del>	
(62) <u>To make recommendations to Historic England on buildings worthy of inclusion on the national list of buildings of historical or special interest.</u>	<u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Historic Environment Manager</u>
(63) <u>To respond to consultations on planning policy documents in respect of land outside the Authority's Executive Area, subject to consideration by the Planning Committee of those documents that have serious implications for the Broads.</u>	<u>Director of Strategic Services or</u> <u>Head of Planning or</u> <u>Planning Policy Officer</u>



# Planning Committee

05 March 2021

Agenda item number 15

## Winterton on Sea Neighbourhood Plan- agreeing to consult

Report by Planning Policy Officer

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### Summary

The Winterton on Sea Neighbourhood Plan is ready for public consultation.

### Recommendation

To agree that the Winterton on Sea Neighbourhood Plan proceeds to consultation.

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## 1. Introduction

- 1.1. The Winterton on Sea Neighbourhood Plan is ready for consultation. The Plan says:  
'This Neighbourhood Plan builds on and sits alongside the existing Winterton-on-Sea Parish Plan 2004 which contains a series of community actions. The Parish Plan, like this Neighbourhood Plan, was developed following significant community input and consultation. However, although the Parish Plan has been and continues to be an extremely useful report, the Neighbourhood Plan, being a statutory document that will become part of the Borough Council and Broads Authority's development plan, has more far reaching implications. It will be used, for example, to help the Borough Council and the Broads Authority determine planning applications in the parish. The Neighbourhood Plan aims to build on the strengths of the parish and its community, protecting what is good. It also aims to address concerns and manage in the right way any change and development'.
- 1.2. This report seeks agreement for public consultation to go ahead. It should be noted that the Broads Authority is a key stakeholder and is able to comment on the Plan. It is likely that a report with these comments will come to the next Planning Committee for endorsement.

## 2. Consultation process

- 2.1. Great Yarmouth Borough Council will write to or email those on their contact database about the consultation. The Broads Authority will also notify other stakeholders who may not be on the Borough Council's consultee list. The final details for consultation are to be clarified, but the document will be out for consultation for at least 6 weeks.



- 2.2. It should be noted that the consultation is unlikely to go ahead whilst we are in lockdown. This is because ultimately there has to be community support for the Neighbourhood Plan through the referendum, and engaging with local people is a means of achieving that support. When considering how to reach the whole community to inform them of the consultation, including those who are vulnerable/shielding and or those without internet access, any actions must be balanced against the risks of spreading the virus and complying with the law and guidance. For consultation carried out by a Parish Council, ultimately the Parish Council will need to be satisfied that they are striking the right balance between taking necessary steps to meet the neighbourhood planning regulations and complying with the law and guidance, and keeping everybody as safe as possible.

### 3. Next steps

- 3.1. Once the consultation ends, comments will be collated and the Parish Council may wish to submit the Plan for assessment. The Parish Council, with the assistance of Great Yarmouth Borough Council and the Broads Authority, will choose an Examiner. Examination tends to be by written representations. The Examiner may require changes to the Plan.
- 3.2. As and when the assessment stage is finished, a referendum is required to give local approval to the Plan. However, given that referenda are not able to go ahead until May 2021 at the earliest, the Government has made provisions that plans that have been examined and are ready for referendum have significant weight. Therefore, when we get to that stage the Authority will use the Plan to help determine relevant applications, thereby affording the Plan significant weight.

Author: Natalie Beal

Date of report: 27 January 2021

Appendix 1 – Submission version of Winterton on Sea Neighbourhood Plan

Appendix 2 – Consultation Statement

Appendix 3 – Evidence Base

Appendix 4 – Basic Conditions Statement

Appendix 5 – SEA Screening Assessment

Appendix 6 – SEA Screening Opinion

Appendix 7 – Evidence base update

Appendix 8 – Holiday homes and secondary homes evidence



The Common

# Winterton-on-Sea Neighbourhood Plan 2020-30

Low Farm

Winterton-on-Sea

Black Street

The La

Bulmer Lane

The Craft

Barn Farm





# Contents Page

	Page
Introduction	1
Neighbourhood Planning	3
Vision and Objectives	6
Housing	7
Environment	15
Community Assets	23
Traffic and Transport	30



# Introduction

1. This Neighbourhood Plan builds on and sits alongside the existing Winterton-on-Sea Parish Plan 2004 which contains a series of community actions. The Parish Plan, like this Neighbourhood Plan, was developed following significant community input and consultation. However, although the Parish Plan has been and continues to be an extremely useful report, the Neighbourhood Plan, being a statutory document that will become part of the Borough Council and Broads Authority's development plan, has more far reaching implications. It will be used, for example, to help the Borough Council and the Broads Authority determine planning applications in the parish.
2. The Neighbourhood Plan aims to build on the strengths of the parish and its community, protecting what is good. It also aims to address concerns and manage in the right way any change and development.
3. As background, Winterton-on-Sea is a small village on the east coast of Norfolk. Until the 20<sup>th</sup> Century the village was mainly a fishing and farming community. Now, it is loved by both residents and visitors who flock year-round to the dunes and beach. It is a very pretty village and considerable effort is put in by residents to retain the village's attractive appearance. This includes annual participation in Winterton in Bloom and caring for green spaces within the village.
4. Winterton-on-Sea has a gently sloping topography down towards the sea and general nucleated layout, bounded by fields and the coast. The older village centre which lies closest to the beach is dense with narrow and quiet lanes, with limited off street parking and footways. Homes here are diverse in terms of their style. Newer estate development emanates out from the village centre.
5. The village has a number of buildings of historic significance. The Holy Trinity and All Saints church dates back to the early 13th Century and is Grade I Listed. Its 130-foot-high tower is the second highest in Norfolk and originally used as a navigation aid for shipping prior to the lighthouse being built. The historic Octagon Lighthouse and Fisherman's Return public house, built of brick and flint dating back over 300 years, are also of local significance.
6. Winterton-on-Sea has a resident population of around 1,300, though its numbers swell to many more particularly in the holiday season. It has a number of local services, including a primary school, village pub, shop and post office, tea rooms, chip shop and a number of seasonal shops.
7. The coast is recognised nationally and internationally as an important site for wildlife with the Winterton-Horsey Dunes Special Area of Conservation, Site of Special Scientific Interest and National Nature Reserve. The landscape here is wild and windswept, which contrasts markedly with other coastlines within the borough, which display a strong resort influence. Coastal erosion here is a serious concern of residents. A colony of seals lives just north up the coast, with many coming onto the beach and dunes during breeding



season. The beach is also home to the largest UK colony of breeding Little Terns. Due to its environmental importance the village is considered to be very sensitive to development and change.

8. Its proximity to the Broads, which has the equivalent status of a national park, also helps to make Winterton-on-Sea special for both residents and visitors to the area. The Broads have a number of national and international wildlife designations, including the Broads Special Area of Conservation, Broadland Special Protection Area and Ramsar Site, and Upper Thurne Broads and Marshes Site of Special Scientific Interest.



# Neighbourhood Planning

## Overview of Neighbourhood Planning

8. Neighbourhood Planning was introduced in the Localism Act 2011. It is an important and powerful tool that gives communities such as parish councils statutory powers to develop a shared vision and shape how their community develops and changes over the years.
9. The parish is in Great Yarmouth and so the Neighbourhood Plan sits within the context of the Great Yarmouth local plan. The Borough Council has an adopted Local Plan Part 1: Core Strategy (2015). It is also well advanced in developing a Local Plan Part 2: Development Management Policies, site Allocations and Revised Housing Target. Part of the parish is also within the Broads, and covered by the Broads Authority and its own recently adopted local plan.
10. The Neighbourhood Plan will be a document that sets out planning policies for the Parish and these will be used, alongside the local plans, to decide whether planning applications are approved or not. It is a community document, written by local people who know and love the area.
11. The Neighbourhood Plan has to support the delivery of the 'strategic policies' contained in the Great Yarmouth local plan and that for the Broads Authority, and so it cannot promote less development than set out in local plans. That is, the local plans set the overall strategic policies such as the amount of new development, and the distribution of that development.
12. The Neighbourhood Plan can include 'non-strategic policies', such as the mix of housing needed, design principles for new development, conserving and enhancing the natural and historic environment, protecting local green spaces from development, and setting out other development management policies. Importantly, the Neighbourhood Plan will contribute to the achievement of sustainable development as described in the National Planning Policy Framework.
13. Once a Neighbourhood Plan has been 'made', following consultation with residents and a local referendum, it becomes part of the statutory development plan for the parish and will be used by the Borough Council and Broads Authority in deciding on all planning applications in the parish.

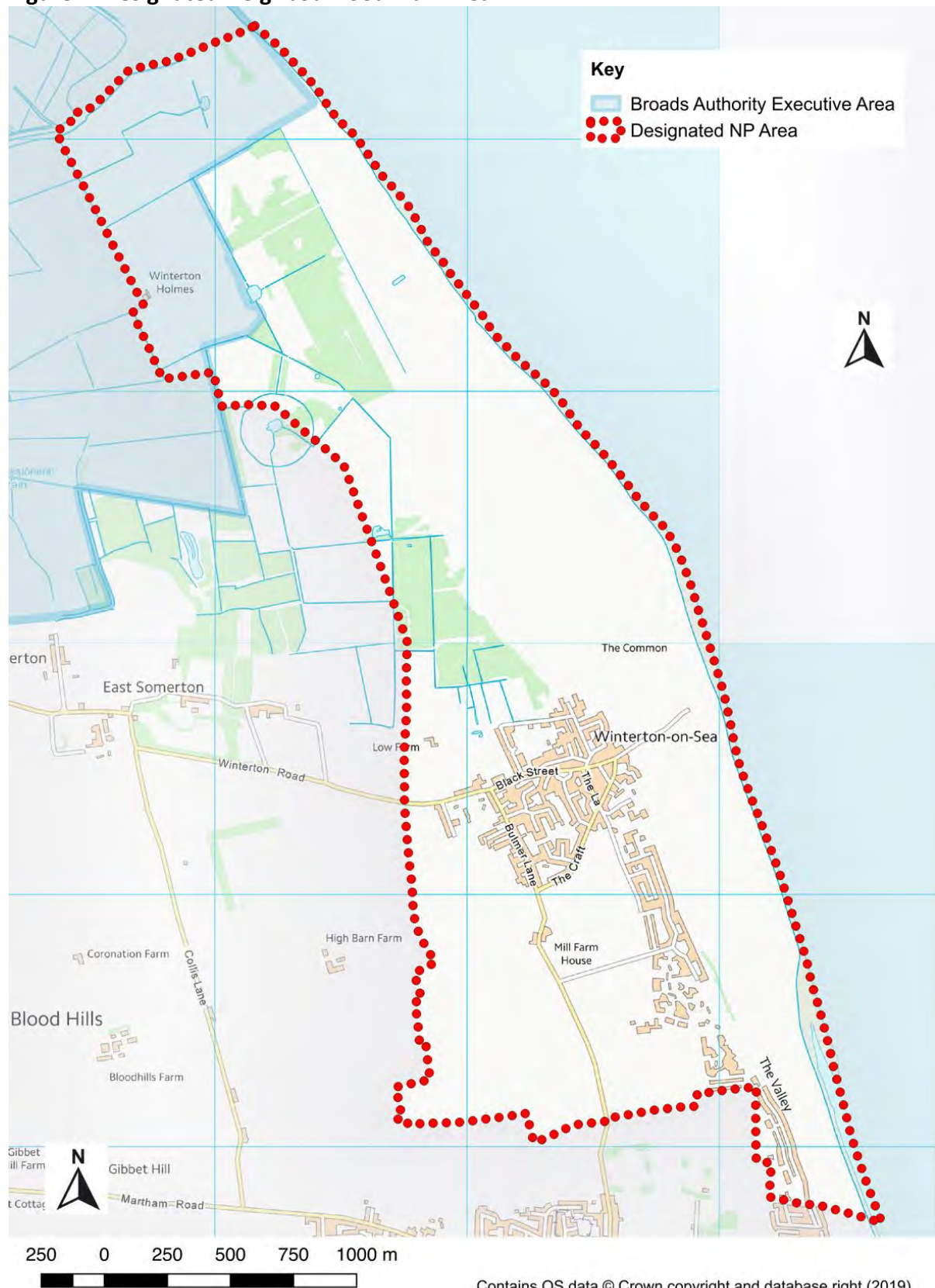
## Process of Developing this Neighbourhood Plan

14. The parish area shown in **Figure 1** was designated as a Neighbourhood Plan Area in August 2017.
15. A broad range of evidence has been reviewed to determine issues and develop policies for the plan that will ensure the village remains vibrant and sustainable, meeting the needs of both residents and visitors. This evidence is summarised throughout the



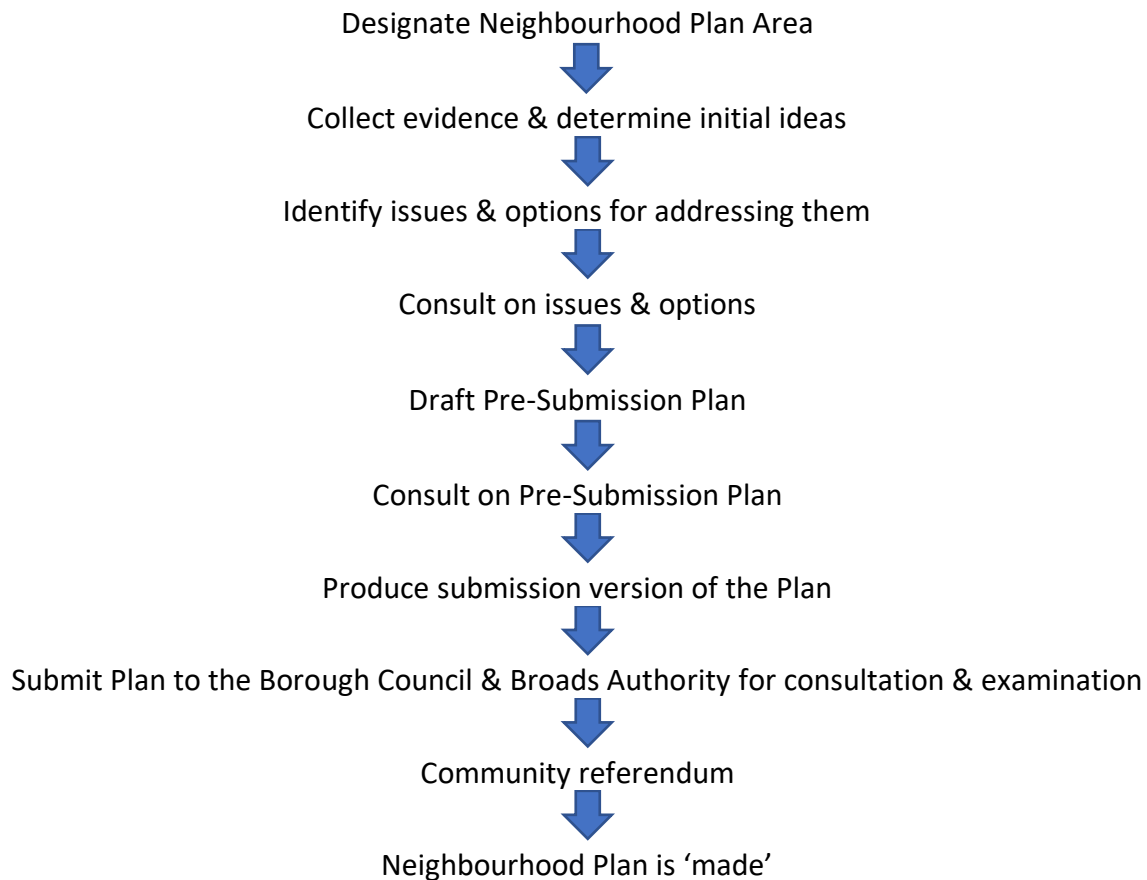
Neighbourhood Plan to support the policies it contains. A full account of the evidence is provided in the Evidence Base which accompanies the Neighbourhood Plan.

**Figure 1: Designated Neighbourhood Plan Area**





**Figure 2: Neighbourhood Plan process**



## Consultation with Residents

16. Winterton-on-Sea Neighbourhood Plan has been developed by residents of the village on behalf of the wider community. A working group, comprising a mix of residents and parish councilors, have overseen the process throughout on behalf of the Parish Council as the qualifying body. Engaging the wider community in the Neighbourhood Plan's development has been a key focus for the working group.
17. In late 2018 a consultation on Issues and Options for the Neighbourhood Plan was undertaken. This included a questionnaire sent to all households in the village and a consultation event, attended by 60 people who live in the village. This enabled residents to provide their views on a wide range of issues as well as comment on draft policies for the plan.
18. The early engagement helped the working group to formulate a pre-submission draft, which was consulted upon March – July 2020.
19. A full account of consultation activities, the key points and how these were considered by the working group is provided in the Consultation Statement which accompanies the Neighbourhood Plan.



# Vision and Objectives

20. Winterton-on-Sea is a very special place, being surrounded by countryside and bordering the sea with areas of natural beauty including the beach and dunes. It is important that any change in the parish makes a positive difference to the lives of local people as well as protecting the sensitive environment.
21. The vision for Winterton-on-Sea depicts how the village will be in 10 years' time, once the plan has been delivered.

## Vision for Winterton-on-Sea

Winterton-on-Sea will be a thriving community and popular visitor destination, providing a range of local services and facilities.

It will have a good balance between the needs of residents and those visiting for the day or longer. It will retain the quiet, laid-back feel that is fitting for an old fishing village, with low traffic volumes and speeds away from the main roads.

The village will enjoy a good mix of housing, including homes for younger residents and families, which have been designed sensitively and reflecting the local character.

The natural environment, including the sensitive dunes, will still be precious to the community and its condition and ecology will have improved.

22. The objectives for Winterton-on-Sea are:

**Objective 1:** To support the provision of affordable housing so that Winterton-on-Sea is a place where people of all ages can live.

**Objective 2:** To support services, clubs and facilities that offer opportunities for enhancing the wellbeing of residents and encourages visitors to spend locally.

**Objective 3:** To provide the right infrastructure to ensure that visitors to the village do not place additional pressure on environmentally sensitive areas.

**Objective 4:** To improve the walkability of the village and connections to the wider countryside and surrounding communities such as Hemsby.

**Objective 5:** Seek opportunities to reduce the impact of vehicular traffic and parking in the village centre.

**Objective 6:** To protect, promote and enhance the sensitive landscape and habitats of the dunes and beach so that they are prioritised over future development.

**Objective 7:** Respond to climate change, promoting sustainable development and energy efficiency.



# Housing

## Development Limits and Residential Development

23. The adopted Great Yarmouth Local Plan and the emerging Local Plan Part 2 both designate Winterton-on-Sea as a Primary Village with a development limit which is defined in the Policies Map for Winterton-on-Sea. The emerging Policy GSP1 of Local Plan Part 2 sets out the Borough Council's approach to development limits. In general terms, there is support for appropriate housing development within the limits, whilst outside of the limits it is seen as not acceptable.
24. The village does not have a housing allocation within the emerging Great Yarmouth Local Plan or within the adopted Local Plan for the Broads. The identified housing requirement is therefore zero. Winterton-on-Sea has significant environmental constraints, such as the dunes, and had few sites put forward for development in the consultation on the emerging local plan. Winterton-on-Sea's current population is also less than 40% of the average size of the other primary villages in the borough. So it is smaller and has significant protected habitats and landscape constraints. For these reasons the Borough Council and Broads Authority determined not to propose any housing allocations in Winterton-on-Sea.
25. The Neighbourhood Plan does not allocate land for residential development, but is supportive of small-scale and appropriate development that accords with the policy framework. It is recognised that this may result in the housing requirement (of zero) being exceeded over the plan period.
26. There could be circumstances where applications for new housing outside of the development limits can be granted permission because of Paragraph 11(d) of the National Planning Policy Framework being triggered. This happens, for example, if the Borough Council (or Broads Authority) cannot demonstrate a sufficient supply of housing land, or because it is unable to deliver a sufficient number of new homes. In such circumstances, policies such as the development limits are given very limited weight because they are considered to be out-of-date, and so residential development can happen beyond the development limits in this event.

## Housing Type

27. Winterton-on-Sea's housing profile is dominated by detached homes, and a fairly high proportion are quite large, with at least three bedrooms. In contrast, homes in the village centre are much smaller, terrace properties, many of which are second or holiday homes. Home ownership is high, and in particular the proportion of people who own their homes outright rather than with a mortgage. This might make it difficult for people with lower incomes, or the younger generation, to stay in the village as there are fewer homes to rent.
28. There is a very low proportion of one-bed homes, only 19 dwellings, or 3%. In contrast, almost a third of households are single occupancy, suggesting there may be unmet need



for smaller unit housing. Furthermore only 34% of homes (so around 1 in 3) are one or two bedroomed, whereas in the borough as a whole it is 43%. Some older people living alone will find it difficult to downsize whilst remaining in the village, so are unable to free up larger homes for families moving up the housing ladder.

29. Thirty-six percent of residents are aged 65 or over (2016 estimate), an increase of 20% in numbers of older people since the 2011 Census. Winterton-on-Sea has a population that's ageing faster than surrounding communities, suggesting that older people are choosing to move into the community and given the slow population growth overall – that younger people are moving out. And of course, existing residents are getting older. Responses to the issues and options consultation in 2018 indicate that Winterton-on-Sea has become a popular retirement village.
30. This could have an impact on the school's viability if continued. It could also be an indication of the right homes not being available for younger people. There could be a need to provide a mix of housing that can attract younger people or enable them to stay in the parish, and that also provides for the ageing population, especially providing opportunities for them to downsize if they wish or buy homes that are suitable for their needs as they get older. As a minimum, the Neighbourhood Plan will need to ensure that the proportion of homes that are one or two bedroomed does not decline over the plan period, and ideally increases so that a higher proportion of homes at the end of the plan period are smaller.
31. According to Great Yarmouth Borough Council there are 68 affordable homes in Winterton-on-Sea, representing around 10% of total housing stock. This seems fairly high, but demand for affordable homes (as measured by the number of people on the Housing Register) currently outstrips supply – particularly for smaller unit homes. No new affordable homes have been built over the last five years. Affordable housing comprises:
  - Affordable housing to rent from a registered provider
  - Starter homes
  - Discounted market sales housing
  - Other affordable routes to home ownership – such as rent to buy/ shared ownership
32. The National Planning Policy Framework has recently introduced the concept of Entry-level Housing Exception Sites. These are affordable homes suitable for first time buyers (or those looking to rent their first home). Feedback from consultations tended to support the evidence, in that people want more smaller homes of 1 or 2 bedrooms, and affordable homes, and especially starter homes and homes that are adaptable for older residents. There was, however, still recognition of the need for 3 or 4 bedroom family homes.



### Policy HO1: Housing Mix

Proposals should provide a mix of housing types, especially smaller unit homes and homes suitable for younger and older residents.

Housing developments, including the conversion of existing buildings to dwellings, should provide evidence of the community need in terms of likely housing mix and as a minimum must, unless clear evidence for an alternative mix is provided, meet the following criteria:

- On schemes of more than five dwellings, at least 33% of those dwellings should have two bedrooms or fewer, with no other rooms that can easily be put to use as a bedroom once the dwelling has been completed.

These standards might be relaxed if a scheme can be shown to be unviable otherwise.

Separate proposals on contiguous sites that are in the same ownership and/or control, or have a planning history indicating that they have been considered together, will be considered as single proposal.

33. This policy should provide additional smaller dwellings. These should be more suitable for older people living alone and wishing to downsize, and they should also be more affordable for younger people wanting to get on the housing ladder. It is recommended that the Local Planning Authority removes permitted development rights on new homes that are two or three bedrooms to prevent much needed smaller housing from being extended without appropriate consideration of the impacts.
34. Although a mix of housing as set out in **Policy HO1** will be expected, it is recognised that with building conversions it might not be possible to meet the size requirements as it could be constrained by the existing building fabric.
35. Just for clarity, the policy is not concerned with householder applications (such as extensions) but new housing. Furthermore, it cannot apply to permitted development, such as the conversion of agricultural buildings to dwellings.

### Affordable Housing

36. There is a need to provide more affordable housing to local people. Seventy percent of respondents to a survey about housing need stated that there was a requirement for affordable housing in the village. Affordable housing was considered to encourage a more sustainable community, that attracts younger people and families, which are much needed to support year-round village services such as the Primary School. Some people knew others who had moved away, with the village unable to meet their housing needs. Over the last five years there have been no new affordable homes built in the village and evidence from the Great Yarmouth Borough Council allocations pool indicates that demand significantly outstrips the current supply of affordable homes. To help meet the affordable housing need, especially for those trying to get on the housing ladder, it is



proposed that rural exception sites and/ or entry-level exception sites outside of the development limits are encouraged.

37. There is a risk that exception sites for affordable housing will be located such that future occupiers will be dependent on a car or more than one car to access services, thereby further stretching their finances as well as adding to the traffic and parking issues in the village centre. For this reason, there will be an expectation that exception site proposals will demonstrate that future occupiers can reasonably access local services by means of walking, cycling or public transport. Such schemes also need to be close to the village to minimise encroachment into the open countryside and be small-scale, in proportion to the size of the village.
38. **Policy HO2** supports sites that are reasonably adjacent to the development limits. The word adjacent is not defined in the Planning Act, the dictionary definition is *very near, next to or touching*. The policy therefore allows for sites to be detached, or to have some separation from the development limits defined in the Great Yarmouth Local Plan Policies Map for Winterton-on-Sea. It is not necessary for sites to be adjoining or abutting, though they do need to be reasonably related the settlement. This has regard to national policy, which requires entry-level exception sites to be adjacent to existing settlements. The policy takes a reasoned departure on the basis that affordable housing is much needed in Winterton-on-Sea, by adding the word ‘reasonably’ before adjacent.
39. The Borough Council will need to ensure that any planning permission granted for affordable housing schemes and entry-level exception sites is subject to appropriate conditions and/or planning obligations to secure its affordability in perpetuity (for the life of the property) where this is possible.

#### **Policy HO2: Affordable housing**

The inclusion of affordable housing or contributions as part of proposals that would not normally be required to make such provision will be seen as delivering a significant community benefit.

Small-scale rural exception sites or entry-level exception site proposals for affordable housing that are outside of the development limits as shown in the adopted Great Yarmouth Local Plan will be supported where:

- a) The site is reasonably adjacent the development limits;
- b) The proposal will enable future occupants to have reasonable and safe access to local services and facilities using sustainable means of transport; and
- c) The affordable/entry-level housing provided is made available to people in local housing need at an affordable cost for the life of the property (in perpetuity), in accordance with the prevailing sequential approach used by the borough council for allocating affordable housing.



## Design

40. Winterton-on-Sea has a gently sloping topography towards the sea and a general nucleated layout, with newer development emanating out from the village centre. The centre is dense with narrow and quiet lanes that have limited off street parking or footways. Many of the houses in the village centre are historic and are diverse in terms of their architectural style and the materials used, which is characteristic of the village's built environment. Some of the newer development reflects this to a degree, but more commonly is more generic and less dense. The Character Appraisal which is part of the supporting evidence for the Neighbourhood Plan provides more detail.

### Policy HO3: Design

Design which fails to have regard to local context and does not preserve, complement or preferably enhance the character and quality of its immediate area and the wider parish will not be acceptable. Proposals should therefore be of an appropriate density, appearance, height, variety, scale and layout, and be of a high quality design. Proposals should be well integrated, both visually and functionally, with the immediate surroundings. It is expected that affordable homes will be included in the unifying theme for all new developments, and must not be of a noticeably lower quality.

Proposals in the historic village centre, see **Figure 4**, will be supported if it contributes to the variety of design whilst reflecting and contributing towards the historic and eclectic architectural character of the village centre, building on its local distinctiveness.

Proposals outside of the historic village centre that are of an innovative design with high environmental standards will be supported. Proposals on the edge of or adjacent to the village will be expected to be of a density, height and layout that reflects a transition into the open countryside, with views into the countryside retained.

Proposals for new residential development comprising mainly terraced or semi-detached dwellings will be considered favourably, depending on the immediate context and the need to visually integrate.

Alterations or extensions to buildings of heritage value, whether in the historic village centre or not, should use traditional materials and designs for roofs, chimneys, porches, elevations, windows and doors etc.

To promote sustainable access, all applications within or adjacent the development limits should be able to demonstrate that the site is accessible by walking and that future occupiers will be able to walk to most of the local services and facilities and to a bus stop.

Electric car charging points will be expected to be provided as part of all new development, one per formal parking space.

In all cases, an exceptional standard of design will weigh significantly in favour of proposals.



41. The Character Appraisal (which is available as an appendices to the Neighbourhood Plan Evidence Base) summarises aspects of the built-environment that are characteristic of the parish and which, individually or in combination, are considered to be essential in order to maintain the character and appearance of the parish. New development must have due regard to this, although this should not stifle innovation, which is welcomed. This policy applies to new residential development as well as other types of development, including extensions.

### Principal Residence Housing

42. The prevalence and impact of second and holiday homes in Winterton-on-Sea is explored in some detail in the supplementary evidence that accompanies this Neighbourhood Plan. Overall, census data shows that the percentage of households with no usual residents in the plan area is markedly greater than across the borough or county as a whole. Local research indicates that the highest concentrations of second or holiday homes is in the village centre, on The Lane, King Street and Beach Road, where they out number dwellings occupied by permanent residents.
43. The socio-economic effects second and holiday homes are being felt by the local community. The increase in second home owners has, it is widely reported by residents, resulted in rising property prices, which has put homes in the parish beyond the reach of young families and local people wishing to join the property ladder for the first time. This threatens the long-term viability and vitality of the village as a sustainable year-round community. In 2018 the village almost lost its local primary school due to the gradual decline in numbers of children on roll. This is in part due to the decline in families with young children living in the community. Other reported impacts include some residents feeling isolated as they have few permanent neighbours, especially in the winter months, and that this can harm community cohesion. This perhaps is mostly related to second home ownership rather than holiday lets as the tourist economy in Winterton increasingly operates year-round. Other impacts are reported, such as less maintenance, including gardening, being carried out on second homes occupied only intermittently, and this can harm the street-scene and overall character.
44. Balanced against this, residents also recognise the positive contribution that tourists make to the local economy and sustainability of valued services within the community, including the local shop and pub. Visitors are also seen to make the village more vibrant. On balance, the community are supportive of presence of holiday accommodation and the clear benefits this brings to the local economy. However, there is less support for second homes, with many of these sitting empty for a great proportion of the year.
45. A policy intervention is considered necessary to manage the number of new dwellings which are built as, or become, second homes, particularly bearing in mind the sensitive environment and the need to provide homes for local people. The plan supports the development of housing that will be permanently occupied, defined in the plan as Principal Residence housing. The effect of this policy intervention is to support an increase in the number of year-round residents in the village, thus creating a more sustainable community.



#### Policy HO4: Principal Residence Housing

Proposals for all new housing, including new single dwellings, conversions and replacement dwellings, will only be supported where first and future occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a Principal Residence. Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement.

Occupiers of homes with a Principle Residence condition or obligation will be required to keep proof that they are satisfying the requirements as set out in this policy and will be obliged to provide this proof if/when Great Yarmouth Borough Council requests it. Proof of Principal Residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc).

46. Principal Residence housing is that which is occupied as the sole or main home of the occupants. The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them. **Policy HO4** does not restrict proposals specifically for tourism accommodation, which is recognised to bring economic benefits to the village.
47. A good mixture of tourist and visitor accommodation is essential to supporting visits and tourism and the local economy. This is particularly the case where proposals enable existing buildings to come back into use. Ideally such accommodation should be within the development limits as this is more sustainable, especially in terms of access to services. **Policy HO5** also supports tourism proposals outside of the development limits, especially for the conversion of existing buildings, including farm buildings. It will not be possible to meet the need for all new tourist and visitor facilities within the village, and other types of accommodation may be needed outside to meet new visitor expectations.
48. Where new accommodation is permitted appropriate planning conditions will be applied to ensure the facility is genuinely available for holiday lettings, and to help manage any adverse impacts on the environment and the character and appearance of the countryside. Typically, these will take the form of a requirement for the removal of temporary structures at appropriate intervals, and holiday occupancy conditions placed on un-serviced holiday accommodation or sites.
49. **Policy HO5** specifically applies outside of the Broads Authority Executive Area, as the Local Plan for the Broads has various policies relating to tourism development in close proximity to the Broads.



## **Policy HO5: Tourist Accommodation**

Proposals for new tourist accommodation located outside of the Broads Authority Executive Area will generally be permitted in accordance with the following criteria:

- Proposals for new built permanent or semi-permanent tourist and holiday accommodation will be required, unless specific justification is provided, to locate within the development limits or on sites that are well related to the village, and at a scale appropriate to the village;
- Outside of the development limits, proposals for the conversion of existing buildings, including farm buildings, for tourist accommodation will be supported provided they demonstrate a creative use of the existing structures;
- It will be for short stay occupation on a rented basis for a substantial period of the year, not occupied on a continuous basis by the same people, and not used as a second home or for the main residence of the occupiers.

Any tourist accommodation must be of similar quality to residential dwellings and adhere to **Policy HO3**.



# Environment

## Natural Environment

50. The dunes, dune grassland, dune heath and beach at Winterton-on-Sea give the settlement a wild and windswept character, which is almost unique to this part of the coastline. The open and exposed aspect allows some views to the sea and glimpses of the sand dunes from the village centre. This is treasured by those who live in the community and priority should be on retaining such views and character.
51. The dunes are under high recreational pressure, used extensively by residents and visitors, mostly on foot. The dunes are designated a Site of Special Scientific Interest (SSSI), Area of Outstanding Natural Beauty (AONB), Special Area of Conservation (SAC) and National Nature Reserve (NNR), which affords them protection and there are active plans in place to support their conservation. However, recent monitoring shows that a proportion are in an unfavourable condition and high visitor numbers has caused some erosion, particularly on key paths between the car parking and beach. The beach and dunes are also under threat due to a changing coastline, which is exacerbated by sea level rises due to climate change.



*Winterton beach and dunes*

52. There are three County Wildlife Sites in Winterton-on-Sea. The settlement edge to the north includes Decoy Wood and South Wood County Wildlife Site, which forms part of the buffer to the Winterton Dunes. It comprises a varied range of habitats including broadleaf semi natural woodland alongside grassland and scrub. Directly north of this is North Wood County Wildlife Site, an enclosed area of wet heathland and acidic grassland grazed by sheep, then furthest north a block of young broadleaved woodland. The third site,



situated behind the church and known as Parish Council Land consists of dense scrub and woodland. This site is divided by several drainage ditches supporting a range of species.

53. The parish's proximity to the Broads, which has a status equivalent to a national park, and a number of important wildlife designations, is also part of what makes Winterton-on-Sea special.
54. Although these high value areas of ecology and biodiversity are afforded protection already, a policy is included within this Neighbourhood Plan to provide clarity on what this means for local development or related planning changes.
55. Biodiversity net gain can be assessed and measured using DEFRA's biodiversity metric. The Neighbourhood Plan felt it important to specify a percentage gain as a minimum to avoid proposals seeking to exploit the aim of the policy by providing negligible net gains of, for example 0.1%. Ten percent has been chosen as reasonable as this was the minimum net gain proposed by the Government in its consultation on the matter by DEFRA in December 2018 and this is likely to be carried forward in legislation. A 10% net gain will be applied unless a higher standard is required by the Environment Bill. The provision of habitat, whether on-site or through off-site arrangements or contributions, can be part of a multi-functional scheme that, for example, also delivers landscaping or open space. Successful implementation of biodiversity net gain would restore and create high-quality habitats that can provide a home for a diverse range of species and build resilience to climate change.
56. The requirement for development to achieve a net gain for biodiversity should be applied other than for very minor changes such as extensions to houses and brownfield development.

## **Policy E1: Protecting and Enhancing the Environment**

Development coming forward within the Neighbourhood Plan area is expected to result in a demonstrable biodiversity net gain of at least 10% with natural features incorporated into site proposals.

Development proposals which incorporate significant and demonstrable conservation and/or habitat enhancement to improve biodiversity within the following areas may be supported:

- Decoy Wood and South Wood County Wildlife Site
- North Wood County Wildlife Site
- Winterton PCC Land County Wildlife Site
- Winterton-Horsey Dunes

Proposals likely to have a negative effect on notified interests of the Winterton-Horsey Dunes Special Area of Conservation or Site of Special Scientific Interest will not be permitted. Allowance for development should only be permitted where a proposal will specifically aid the conservation of the site.



## Flood Risk and Drainage

57. Flood risk from surface water affects many parts of the village, including the centre, with high risk areas concentrated around Black Street and The Lane. The Lead Local Flood Authority have 4 records of external flooding dating from 2012 and 1 record of internal flooding from 2014. Residents have concerns about the impact of new homes or alterations on drainage and surface water. Flooding could be exacerbated through housing development if surface water run-off is not managed appropriately.
58. The community are keen to ensure that any future development is able to demonstrate there is no increased risk of flooding and that mitigation measures are implemented to address surface water arising from it.

### Policy E4: Surface Water Flooding and Drainage

All development proposals coming forward within the areas of high, medium risk from surface water flooding, as identified by the Environment Agency or Strategic Flood Risk Assessment, and all developments of 5 or more properties, will need to be accompanied by a Surface Water Drainage Strategy that is proportionate to the risk and size of the development.

- This must demonstrate that the proposal will not result in any increase in the risk of surface water or groundwater flooding on site or elsewhere off-site;
- The Surface Water Drainage Strategy, including any necessary flood risk mitigation measures, should be agreed as a condition of the development before any work commences on site;
- Planning applications that improve surface water drainage in the Neighbourhood Plan area will be supported;
- Sustainable Drainage Systems must be incorporated first and foremost for all planning applications and designed in from the start; and
- Appropriate on-site water storage shall be incorporated into drainage schemes to intercept, attenuate or store long term surface water run-off.

All new development will be expected to connect to the public foul sewerage network in accordance with the requirements of Anglian Water unless evidence is produced that it is not feasible to do so. Evidence shall be provided by applicants to demonstrate that capacity is available within the foul sewerage network or can be made available in time to serve the development. If mains sewerage is not feasible then an effective and sustainable private sewerage system plan shall be agreed with the Local Planning Authority in advance of development commencing. Such a plan must be implemented prior to the occupation of the first dwelling.

59. The Neighbourhood Plan seeks to contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources. It recommends developers adhere to Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for



Planning: Guidance Document regarding surface water risk and drainage for any proposed development<sup>1</sup>.

## Agricultural Land

60. The village is surrounded by agricultural land and paddocks. There are long views out over these fields from a number of locations within the village, which adds to its character and is valued by residents. Some of the agricultural land is high grade – Grade 1 or 2, as determined by the Agricultural Land Classification of England and Wales, see **Figure 3**.
61. The economic and other benefits of this high-quality agricultural land should be recognised. It should be noted that the Local Plan for the Broads contains a policy to protect the best and most versatile agricultural land, which also includes Grade 3a. This policy is effective in the Broads Authority Executive Area, with the Neighbourhood Plan **Policy E2** effective elsewhere in the parish..

### Policy E2: High Grade Agricultural Land

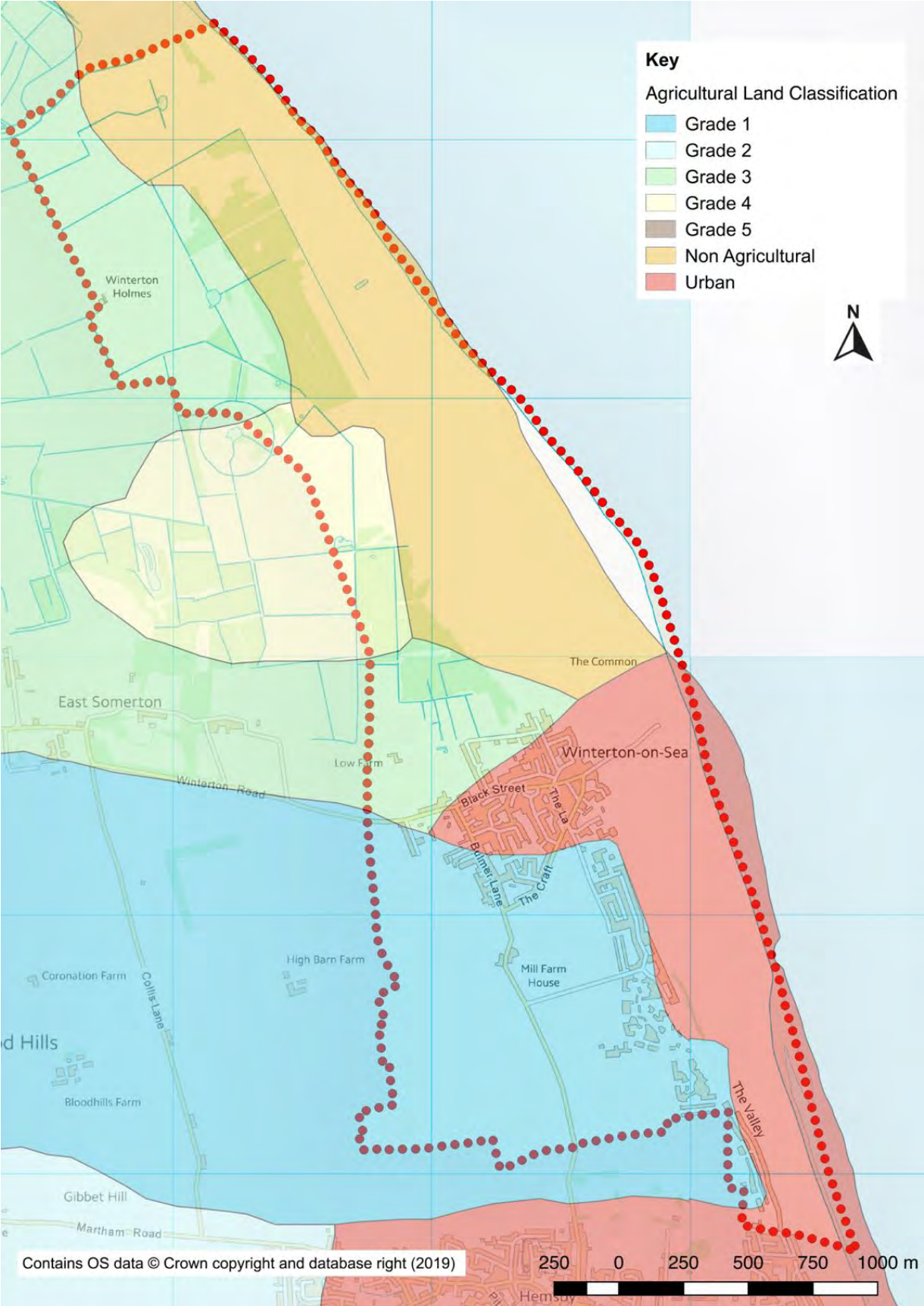
Major development will only be supported on Grade 1 or 2 agricultural land that is viable arable land where the following exceptional circumstances can be demonstrated;

- There is a demonstrable need for the development in the proposed location and alternative sites on poorer quality land are not available; or
- Development on the site is demonstrated as the most sustainable option; or
- There is overriding community benefit.

<sup>1</sup> <https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf>



Figure 3: Agricultural Land Classification





## Historic Character and Appearance



62. Winterton-on-Sea has a distinct character and appearance that reflects its past as a small fishing community. The settlement core is centred on a historic village green and displays a range of materials and building styles, with red brick and flint, clay pantile, thatch and colour washed render all evident. There are closely packed terrace cottages, small gardens, narrow streets and limited parking. The tall flint and stone church tower is also a prominent feature of the historic landscape and focus for the settlement.
63. This part of the village, which leads to the beach, is under pressure from visitor parking and vehicular traffic. As you move away from the centre the village becomes more spread out and uniform in its character, bungalows are prominent and homes are set back from the road with larger gardens and off-street parking. Expansion of the settlement edge to cater for the visitor/tourism industry has created an increasing coalescence with Hemsby.
64. Winterton-on-Sea has a Conservation Area, which is defined as an ‘area of special architectural and historic interest’, the character or appearance of which is desirable to preserve or enhance. The area is split in two and includes both the village centre and area stretching over the dunes, as well as the area around the church along Somerton Road (see **Figure 4**). The beautiful Trinity and All Saints church is a significant landmark, originally built to guide ships at sea, it is over 40 metres high and can be seen from miles around. It is a Grade I listed building, one of only 2.5% of buildings listed nationally, and two Memorials in its vicinity are Grade II.
65. Residents recognise the importance of individual components of character and distinctness seen throughout the village, and would like to protect this and safeguard the natural setting. They are concerned that some recent development in the village has not been of high quality or in keeping, this includes estate development and uniform red-brick homes within the centre. The older village centre has been identified as a specific character area that the community would like to protect and enhance. See **Figure 4** which outlines the area of Winterton-on-Sea which the Neighbourhood Plan would like to designate as the Historic Village Centre. This includes part of the Conservation Area which



stretches along the dunes, but also encompasses the east side of Wilmer Avenue and the village green. A supplementary appraisal document has been produced by the community to support implementation of **Policy E3**, which sets out key characteristics of the Historic Village Centre. This, or an updated version, should be used as a guide for developers.

66. The village does not have a housing allocation within the emerging Local Plan, however it is recognised that small-scale development may come forward in the future to meet demonstrated local housing needs or as windfall applications, and this Neighbourhood Plan allows for sensitive, appropriate and well-designed proposals that fit with the character of the village. See **Policy HO4** on Design.

### **Policy E3: Protecting Winterton-on-Sea's Heritage**

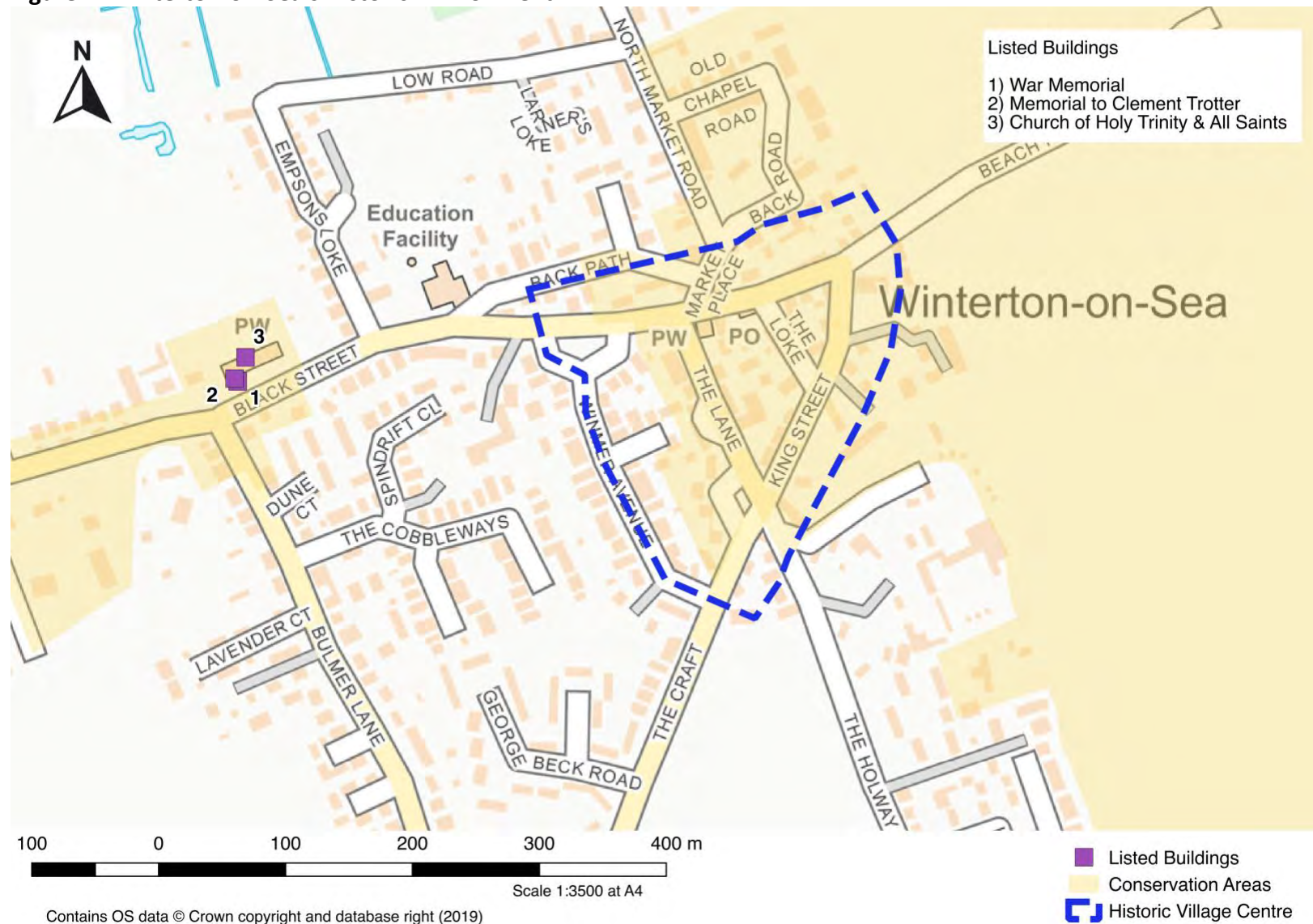
New development proposed within Winterton-on-Sea must take full account of the historic character of the village, which is defined particularly by the designated Conservation Areas and Historic Village Centre.

Any landscape setting, open spaces, heritage assets, key views and vistas identified as contributing to the significance of these areas should as a minimum be maintained. This includes views of the church, which are of particular importance. Overall, development should preserve and enhance the character of these important areas.





Figure 4: Winterton-on-Sea's Historic Environment





# Community Assets

67. Winterton-on-Sea has a range of local amenities that are mainly located in the village centre:

- Primary and Nursery School
- Village shop
- Post Office
- Chip shop
- Village Hall
- Fisherman's Return Pub
- Church
- Hermanus Holiday Park
- Café at the beach
- Allotments

68. The closest GP surgery is Hemsby Medical Practice, around 1.5 miles away, and is accessible by bus hourly throughout the day from the centre of the village. Currently a safe off-road walking route between the two villages does not exist.

69. As required by national and local policy, it is expected that housing and other development will contribute towards improving local services and infrastructure through the payment of a Community Infrastructure Levy (CIL); planning obligations; or the use of planning conditions. At this point in time neither of the Local Planning Authorities have CIL.

70. The primary school has a recent Ofsted judgement of Requires Improvement (2018) and is facing challenges around sustainability with too few pupils. In 2018 Norfolk County Council consulted on a school closure, proposing that children attend Hemsby primary school instead. This did not go ahead and instead the primary school joined Consortium Multi-Academy Trust who are now considering options to enhance the school's sustainability, including the opening of a Field Study Centre alongside the existing school operation. Ongoing provision of a primary school impacts upon the village's attractiveness to families and is important to the community.

## Policy CA1: Winterton-on-Sea Primary School

Proposals for complementary uses of the primary school and nursery grounds will be supported where they maintain its principle function as an education facility and benefit the wider community. A travel plan that encourages sustainable travel and considers parking management will be required to support any proposal.

71. A quarter of residents work in Winterton-on-Sea, which means they are more likely to make use of local services, along with visitors to the community. In addition, 1 in 6 households do not have a car and so are heavily reliant on local service provision.



72. Local residents understand the importance of supporting small-scale local economic growth, such as shops or a café, that is sensitive to the nature and character of the village. This includes a recognition that the village centre, where there are no footways and people need to walk in the road, is already under pressure from traffic and parking, particularly during summer months. 82% of respondents to the issues and options consultation agreed there should be a policy to encourage economic development within the Neighbourhood Plan.

#### Policy CA2: Economic Development

Economic development within the development limits that comprises small business will be encouraged and supported in principle.

Any proposal will need to demonstrate that:

- It can accommodate all related parking off-road, including for visitors; or
- It does not generate a material increase in traffic in the Historic Village Centre (as defined in **Figure 4**). A material increase will be seen as a severe impact given existing parking, highway and traffic constraints within this area.

Any new proposal would need to be accompanied by a travel plan which sets out how sustainable modes of travel would be encouraged and any parking requirements managed effectively.

73. The National Planning Policy Framework suggests that, *“Development should only be prevented or refused on highways grounds if.....the residual cumulative impacts on the road network would be severe.”* The policy does not indicate what would be considered severe, and indeed this will vary enormously. What might be considered as not severe in London would be seen as highly severe in rural villages. **Policy CA2** therefore defines a severe impact as a material increase in traffic as defined by Norfolk County Council’s Safe, Sustainable Development document (November 2015), or any successor document. This should be a reasonable measure bearing in mind:

- The narrowness of the roads in the Historic Village Centre;
- The lack of footway provision;
- The haphazard on-street parking;
- The prevailing high volumes of traffic related to tourism and visitors.

#### Local Green Space

74. The Neighbourhood Plan recognises that some open spaces are especially important to the local community. For example, they can provide a valuable formal and informal recreational facility for both children and adults, or they can add character and interest to a community. People who have good access to open space, parks and other recreation areas have the opportunity to lead more active and healthy lives. These green spaces also provide important wildlife habitat, supporting diverse species and helping to build resilience to climate change.



75. The Character Appraisal and consultation with residents has identified some open green spaces that positively contribute to the overall character and enjoyment of the part of the settlement in which they are located. Winterton-on-Sea would like to designate seven Local Green Spaces in the Neighbourhood Plan. The designation of land as Local Green Space through local and Neighbourhood Plans allows communities to identify and protect green areas of particular importance to them. The designation should only be used where the land is not extensive, is local in character and reasonably close to the community and where it is demonstrably special, for example because of its beauty, historic significance, recreational value, tranquillity or richness in wildlife. All Local Green Spaces identified here are within easy walking distance of people living in the community and considered special in some way. They are also identified as Local Amenity Space within the Great Yarmouth Local Plan.
76. Designation of Local Green Spaces affords the same level of protection as Green Belt and policies should be broadly consistent with national policy for Green Belt. The national policy refers to protecting against inappropriate development, essentially the construction of new buildings, except in very special circumstances. There are some developments that are not considered inappropriate, including limited in-filling in villages, affordable housing, mineral extraction and material changes in the use of land. Whilst these may not undermine the purpose of a large-scale Green Belt designation, clearly any of these on small Local Green Spaces would undermine the purpose of their protection. Therefore, the policy does not refer to 'inappropriate' development, but rather just to 'development'. The policy still allows for development in very special circumstances.

## Policy CA3: Local Green Space

The following existing open spaces, identified in **Figure 5**, will be designated as Local Green Space. These should be protected from development which could erode their contribution towards the settlement's character, the sense of openness they create, and public enjoyment:

- The Allotments (WLGS1)
- Bulmer Pit (WLGS2)
- Duffles Pond (WLGS3)
- Green space adjacent to the village hall (WLGS4)
- The Playing Field (WLGS5)
- The Children's Playground (WLGS6)
- The Village Green (WLGS7)

Development that would harm the openness or special character of a Local Green Space or its significance and value to the local community will not be permitted unless there are very special circumstances which significantly outweigh the harm to the Local Green Space.

Two of the green spaces, Bulmer Pit and Duffles Pond are part of existing Sustainable Drainage features, both acting as soakaways. Development that would have a negative impact on their current drainage contributions will not be permitted.



Figure 5: Local Green Space





## The Allotments (WLGS1)

77. Winterton-on-Sea allotments are directly adjacent to the Church and graveyard, on land owned by the Church. There is a long-standing agreement between the Church and Parish Council for use of the land as allotments, though it is recognised that there may come a time in the future when the land is required to extend the graveyard. This is not anticipated to be during the plan period.

78. The allotments are well utilised and kept by residents to grow local food. Having an allotment is a rewarding activity, encourages people to undertake gentle exercise and is known to build community cohesion among allotment holders. During consultation with the community, the allotments were identified as important for protection as Local Green Space.

## Bulmer Pit (WLGS2)

79. Bulmer Pit is a small wildlife pond adjacent to one of the main routes into the village. At certain times of the year the pit floods and acts as a soakaway for surface water in the vicinity. The pond is important as the habitat for ducks, moorhens and Natterjack toads.

## Duffles Pond (WLGS3)

80. This community wildlife area, located behind the allotments, provides an important habitat for wildlife. It is one of the few ponds accessible to the community within the village. It has facilities like seating and walkways to encourage people to enjoy it and is maintained by the Parish Council. Many people in the community recognised its value during public consultation in November 2018. It also has historic importance, as it used to grow withe (strong flexible willow stem) which were used for wicker basket making. Duffles Pond is also an existing soakaway, part of a Sustainable Drainage feature.



*Duffles Pond*



### Green Spaces adjacent the Village Hall (WLGS4)

81. The village hall is a regular focal point for community activity within Winterton-on-Sea and the green spaces adjacent it add to its amenity value and creates an attractive setting. They are used annually as the site of the village fete and regularly used in the summer by people enjoying the sunshine or for a picnic.
82. There have been proposals that this green space should be converted to additional parking serving the village centre and houses off The Loke, but there is strong feeling within the community as a whole that it should be retained as green space.
83. These green spaces are designated Common Land within the village.

### The Playing Field (WLGS5)

84. This is a playing field for sport and exercise. It provides a flexible, open space and is used by many residents for informal sporting activities and dog walking. There is a full-size football pitch and cricket pitch. By supporting sport and recreation the playing field contributes to the health and wellbeing of the local community. It was identified as special by many residents as part of community engagement.

### The Playground (WLGS6)

85. The playground, accessed off Winmer Avenue or through residential roads, is widely used by children and families, encouraging physical activity and play. It was recently updated following a community campaign to raise funding. It is well maintained. The Neighbourhood Plan seeks to protect this key recreational facility from future growth or development.



### The Village Green (WLGS7)

86. The village green has significant recreational and historic value within the community, providing an attractive setting. It is well kept and during summer months is adorned with flowering planters. The village has won a number of awards including 'Anglia in Bloom' and 'Village Green' competitions. There is seating around the green which is much used by residents and visitors alike. The land is owned by Great Yarmouth Borough Council.



## Investment in Open Space

87. Open space within a community can take many forms, from the Local Green Spaces identified in this plan to more general open areas or linear corridors within the settlement. They provide health and recreation benefits, enable people to move easily between different parts of the village, have ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting of built environments. Any new development must make provision for new open space. The emerging Great Yarmouth Local Plan 2 sets out detailed open space requirements. Depending on the scale of the development and functionality of open space, it will be negotiated on a site by site basis as to whether open space is provided onsite or a contribution is made for off-site provision.

### Policy CA4: Investment in Open Space

Contributions for off-site open space provision will be prioritised to improve local facilities where these are well related to the development. These include:

- Designated Local Green Space;
- Existing Public Rights of Ways, with focus on those linking with nearby settlements such as Hemsby, and those that have the potential to take recreational pressure off the dunes.



*The Village Green: WLGS8*



# Traffic and Transport

88. The main road connecting villages along the coast runs along the western edge of the village's built-up area. Overall the village can be fairly quiet in terms of traffic and the narrowness of streets and poor visibility at some junctions in the centre encourages low traffic speeds. There is concern however about speeding along Black Street, and about the volume of traffic through the village centre at peak visitor times. Although there is ample parking for visitors in formal car parks, many visitors are inclined to park on street in the village centre so as to avoid parking charges with visitors often blocking junctions and private drives. There is considerable local concern about this practice.
89. The village is connected by public transport to Great Yarmouth, with an hourly bus service, which also goes to the James Paget Hospital. In addition, there is a direct bus service once a week to Norwich. This is not sufficient to attract many people away from their cars and just 8% of people travel to work by public transport, with 86% driving.
90. The level of public transport available is also unlikely to encourage many holiday makers out of their cars whilst visiting. Public transport could therefore be developed and improved to benefit both residents and visitors to Winterton-on-Sea.
91. Footways are limited in the village centre, and this is part of the character. Footways are more consistently available along the main roads and elsewhere in the village, but these are rarely on both sides of the road. There are no dedicated cycle paths.
92. The parish is well served generally by the availability of Public Rights of Way, providing access to natural open space, such as the surrounding countryside, dunes and beach. These are used by many residents and visitors. There is a risk that this footfall increases pressure on ecologically sensitive areas of the dunes. There are also concerns about the condition or maintenance of some of the footpaths, and the loss of a footpath between Winterton-on-Sea and Hemsby is keenly felt by many residents.

## Parking



*Parking/traffic issues outside the church in the village centre*



93. Parking is constrained within Winterton-on-Sea village centre. Some homes do not have designated parking and additional pressure is placed on common parking areas by high numbers of day visitors to the beach, particularly during summer months.
94. These additional pressures impact upon the amenity value of the village for residents. As it is often congested with parked cars, residents can find it difficult to park near their homes and footway accessibility is also affected. In addition, the main existing car park at the beach could be impacted by coastal erosion during the plan period as it is within the Local Plan Core Strategy Coastal Change zone. Indeed, part of the car park has already been lost to the sea, reducing the number of spaces available.

## Policy TR1: Public car parking

Proposals for the change of use and development of existing public car parking sites will be supported as long as equivalent and accessible parking facilities are to be provided as a replacement or there is an over-riding public or environmental benefit to the proposal.

Proposals for additional public car parking outside of the village centre will be supported in principle where:

- This will not increase traffic through the centre of the village; and
- It is well located to provide a reasonable alternative to on-street parking.

## Policy TR2: Residential Car Parking Standards

New residential development will need to provide off-road vehicle parking at each dwelling as per the following standards:

Number of bedrooms	Minimum number of off-road spaces
One	One
Two	Two
Three +	Three

These standards may be relaxed if:

- Strict adherence is incompatible with the local character.
- The type of housing being proposed (such as terraced) makes it physically impossible.

In these circumstances, new off-street or formalised on-street provision nearby may be acceptable. Additionally, in recognition that on-street parking could still occur, streets should be designed to safely accommodate unallocated on-street parking.

The level of provision should be such that indiscriminate parking and the obstruction of footways and carriageways is avoided and this should be determined on a site by site basis.



## Community Policy: Parking

The parish will in principle support actions by others, and carry out its own actions, to reduce on-street parking in the village through parking management solutions. This may include taking advantage of opportunities for creating additional off-street parking provision at peak visitor times.

95. The car remains the dominant mode of transport for the majority of people living in Winterton-on-Sea. Car ownership is high among residents with only 16% of households not owning a car at the time of the 2011 Census. Indeed, 38% of households have two or more cars and there is high reliance upon them to get to work with 86% of individuals travelling to work by car or van. In part this is because public transport options are very limited and not flexible enough to meet the needs of most people.
96. The car parking standards set out in **Policy TR2** were strongly supported, by 90% of respondents to a consultation on issues and options for the Neighbourhood Plan. However, it is recognised that meeting these standards may not always be possible or desirable. Flexibility can therefore be shown to reflect the circumstances.

## Walking

97. Walking improves both physical and mental wellbeing and health. It also reduces the need to use the car which has environmental benefits and it is crucial that development should be planned to reduce emissions, helping to mitigate climate change. For Winterton village specifically, greater opportunities for walking can also moderate the traffic and parking problems in the village centre.
98. A feature of the parish is the frequent absence of footways (as identified in the **Character Appraisal**), or indeed footways that are narrow or poorly maintained. There was strong support in the consultations for improving footways (and footpaths) and so improving the walking experience. Better footways, in terms of condition, width and the need for ones where none exist, would therefore be an appropriate policy response to the prevailing provision and to consultation feedback. However, the absence of footways is a key part of the character in places such as parts of the village centre.

## Policy TR3: Walking

To promote safe and convenient walking within the Parish, new developments in or adjacent to the development limits that generate new trips will be expected to improve and/or extend footpaths and footways. Footways must be sufficiently wide, at least 1.5m width where possible, so as to provide safe, convenient and equitable access.

New or improved footways should be provided in the village centre unless this would be contrary to the prevailing character of the immediate area and provided that highway safety will remain acceptable.



99. As per **Policy HO3**, to promote sustainable access, all applications within or adjacent to the development limits should be able to demonstrate that the site is accessible by walking and that future occupiers will be able to walk to most of the local services and facilities and to a bus stop. Contributions and improvements must be proportionately related to the development. These may include the provision of entirely new footways, or the improvement, such as the widening, of existing ones. The footway width should be sufficient for two parents pushing a child's buggy to walk side by side, a minimum width of 1.5m. It is acknowledged that the actual width will be determined through an application, determined by site use, the nature of the adjacent highway and location. It might at times be necessary to provide wider footways, such as near the school or other places where pedestrian flows are likely to be high or where people gather and linger.
100. It may not always be appropriate to provide new or widened footways in the more historic village centre. Fortunately, traffic tends to be going slower in the centre due to the narrowness of many of the lanes, and so the roads are effectively operating as shared spaces.

## **Community Policy: Footpath between Winterton-on-Sea and Hemsby**

The parish will investigate the re-opening of the public footpath between Winterton-on-Sea and Hemsby which would provide benefits in terms of creating a safe walking route and encouraging recreation.

101. Improvements to footpaths as part of the Public Rights of Way network is also covered in **Policy CA4** on Open spaces.



The Common

# Winterton-on-Sea Neighbourhood Plan





# Introduction

## Overview of Winterton-On-Sea Neighbourhood Plan

1. Winterton-on-Sea Neighbourhood Plan has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011, the Neighbourhood Planning (General) Regulations 2012 and Directive 2001/42/EC on Strategic Environmental Assessment.
2. It establishes a vision and objectives for the future of the parish and sets out how this will be realised through non-strategic planning policies.

## About this consultation statement

3. This consultation statement has been prepared to fulfil the legal obligation of the Neighbourhood Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should contain:
  - a) Details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b) Explains how they were consulted;
  - c) Summarises the main issues and concerns raised by the persons consulted; and
  - d) Describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.
4. It has also been prepared to demonstrate that the process has complied with Section 14 of the Neighbourhood Planning (General) Regulations 2012. This sets out that before submitting a plan proposal to the local planning authority, a qualifying body must:
  - a) Publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the Neighbourhood Plan area:
    - i. Details of the proposals for a neighbourhood development plan;
    - ii. Details of where and when the proposals for a neighbourhood development plan may be inspected;
    - iii. Details of how to make representations; and
    - iv. The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
  - b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
  - c) Send a copy of the proposals for a neighbourhood development plan to the local planning authority.
5. Furthermore, the National Planning Practice Guidance requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan, and ensure that the wider community:
  - Is kept fully informed of what is being proposed;
  - Is able to make their views known throughout the process;



- Has opportunities to be actively involved in shaping the emerging Neighbourhood Plan; and
  - Is made aware of how their views have informed the draft Neighbourhood Plan.
6. This statement provides an overview and description of the consultation that was undertaken by Winterton-on-Sea Parish Council in developing their Neighbourhood Plan, in particular the Regulation 14 Consultation on the pre-submission draft. The working group have endeavoured to ensure that the Neighbourhood Plan reflects the views and wishes of the local community and the key stakeholders which were engaged with from the very start of its development.

## Summary of consultation and engagement activity

7. This section sets out in chronological order the consultation and engagement events that led to the production of the draft Winterton-on-Sea Neighbourhood Plan that was consulted upon as part of the Regulation 14 Consultation.
8. A significant amount of work went locally into engaging with the community early in development of the plan, so that it could be informed by views of local people. Consultation events took place at key points in the development process, and where decisions needed to be taken, for example on local green spaces. A range of events and methods were used and at every opportunity the results were analysed and shared with local people.

## Summary of Early Engagement

Activity	Date	Who was consulted	Summary
Public meeting to discuss developing a Neighbourhood Plan	June 2017	Local residents GYBC	Inaugural meeting of the parish council with public attendance to discuss development of a Neighbourhood Plan. Feedback on training attended by members of the Parish Council given.
Website	June 2017	Local residents	<a href="#">Neighbourhood Plan</a> page established on the Winterton-on-Sea Parish Council website. Ongoing work to regularly update this including minutes from all working group meetings.
Area designation	August 2017	GYBC, Broads Authority	Area designation approved through the Borough Council and Broads Authority
Steering group established	August 2017	Parish Council, residents	Including 4 members of the Parish Council, the parish clerk and 6 residents. This met as and when



			required to take decisions. All agendas and minutes published on the website.
Issues and options consultation	November 2018	Local residents Local businesses	Advertisement on the front page of the parish newsletter which is distributed to all households, see <b>Appendix A</b> . Online and paper survey, see <b>Appendix B</b> . A consultation event attended by 60 people. A write up of the consultation event is provided in <b>Appendix C</b> .
GYBC & Broads Authority review draft plan	July 2019	GYBC Broads Authority	Review draft plan and provide feedback prior to Regulation 14 Consultation
SEA Screening Opinion	May-July 2019	Statutory Environmental Bodies GYBC	Statutory Environmental Bodies consulted on the draft plan as part of a Strategic Environmental Assessment Screening exercise.

## Early engagement - summary of the main issues raised

### 9. These included:

- The pressure of traffic and parking in the historic centre of the village which leads to the beach and is particularly acute during the summer months when there is a high volume of visitors;
- Although there is currently no suggested housing allocation for Winterton in the emerging Local Plan for Great Yarmouth, the community is concerned about a lack of affordable housing within the village as well as smaller dwellings, and the problem with getting on the housing ladder;
- A significant issue raised throughout the consultation process was the lack of availability of housing for people in the local community, and the number of holiday homes and second homes in the village;
- The need for good access to the countryside and green spaces, and the increasing pressure that recreational use places on the dunes;
- Supporting the natural environment;
- People who live in the village wish to see a good balance between the needs of residents and visitors;
- The importance of good design;
- Striking the balance between having lighting for security and personal safety, but also protecting dark skies;
- The need to improve and protect green and open spaces in the village;
- The condition and availability of footways in the village;
- How to support small business enterprises;
- Key concern over coastal erosion and protection of the dunes.



## Early engagement - how this was considered in development of the pre-submission plan

10. Winterton-on-Sea is a very popular holiday and day trip destination, year-round, but particularly in season. A key aspect of the Neighbourhood Plan has been about balancing the longer term needs of residents with those of visitors. Feedback from residents has helped to shape a number of policies that seek to address some of the more negative consequences of high visitor numbers. This includes a policy on principal residence housing, tourist accommodation, public and residential car parking.
11. Feedback from residents on local housing need has influenced policies in relation to housing mix and type.
12. Feedback on the draft vision and objectives, alongside the Strengths, Weaknesses, Opportunities and Threats activity undertaken at the consultation events was used to finalise these for the pre-submission plan.
13. The issues and options consultation in November 2018 was used to refine key policy areas for the plan, including housing mix and design, Local Green Spaces and parking for new development. Many comments were received about potential Local Green Spaces during the consultation, with residents asked to make comments on why they were special to the community. Responses particularly related to the wildlife value and recreational benefit of spaces. The comments helped the working group refine the list of Local Green Spaces included in the plan.

## Regulation 14 Consultation

14. An initial period of consultation ran from 19 March to 2 May. It commenced just before the Covid-19 lock down restrictions were brought in and was later extended to 16 May to allow additional time.
15. In accordance with recommendations by Great Yarmouth Borough Council the pre-submission plan was republished for a further six-week consultation from 28 May to 9 July. This was following legal advice from their Barrister, which can be viewed in **Appendix D**. During the second consultation period hard copies of the plan were advertised to be available from the Post Office which was open for the full six weeks of the second consultation period. Responses were also permitted from the statutory consultees up to 9 July.

## Details of who was consulted

16. Everyone who was consulted is listed in the table below. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14.



Who	Method	Response Received
Residents	<ul style="list-style-type: none"> <li>Survey delivered to all households in the parish (<b>Appendix E</b>)</li> <li>Hard copies of the plan initially available from six places in the village, of which the Post Office remained open throughout, including during Covid-19 lock down. Hard copies were also available via email/phone from the parish clerk or a member of the steering group.</li> <li>All documents, including supporting evidence, available online</li> <li>Online survey</li> <li>Posters in key locations around the village (<b>Appendix F</b>)</li> <li>Advertised on the website</li> <li>Article in the village newsletter which is sent to all residents and available online <b>See Appendix G</b>)</li> <li>Advertised on Facebook</li> </ul>	33 responses
Neighbouring parishes – Hemsby, Somerton, Horsey.	Emailed stakeholder letter (see <b>Appendix H</b> )	No
Anglian Water	Emailed stakeholder letter	No
British Pipeline Agency	Emailed stakeholder letter	No
Broads Authority	Emailed stakeholder letter	Yes
Cadent Gas	Emailed stakeholder letter	No
Environment Agency	Emailed stakeholder letter	No
Essex and Suffolk Water	Emailed stakeholder letter	No
Great Yarmouth Borough Council	Emailed stakeholder letter	Yes
Health and safety Executive	Emailed stakeholder letter	No
Highways England	Emailed stakeholder letter	No
Historic England	Emailed stakeholder letter	Yes
Marine Management Organisation	Emailed stakeholder letter	No
Natural England	Emailed stakeholder letter	Yes
Norfolk and Waveney STP	Emailed stakeholder letter	No
Norfolk County Council	Emailed stakeholder letter	Yes



North Norfolk District Council	Emailed stakeholder letter	No
Norfolk Coast Partnership	Emailed stakeholder letter	Yes
Norfolk Wildlife Trust	Emailed stakeholder letter	No
Openreach	Emailed stakeholder letter	No
Sport England	Emailed stakeholder letter	No
UK Power Networks	Emailed stakeholder letter	No

## Consultation Methods

17. Several methods were adopted to ensure that all relevant bodies and parties were informed of the consultation, as well as ensuring that local residents were made aware of the consultation and provided with opportunities to provide their views and comments.
18. A leaflet on the Neighbourhood Plan and survey was sent to every household and business in the parish, this was undertaken at the beginning of the first period of consultation. This informed people how they could access the draft plan and supporting documents, make representations and the timeframe for doing so. A copy of the leaflet/survey is in **Appendix E**.
19. A poster was placed in various locations around the village, including all noticeboards and in shops. A copy of this is provided in **Appendix F**. This provided details on where and when the Neighbourhood Plan could be inspected, including electronic and hard copies. This was undertaken at the beginning of both the first and second periods of consultation.
20. The consultation was advertised in the village newsletter, which is printed and sent to all residents of the parish, the article published is shown in **Appendix G**. Note that this advertises a consultation event, which did not take place due to lockdown.
21. During the consultation period the Neighbourhood Plan was advertised and available for download along with all the supporting documents on the website:  
  
<http://www.winterton-on-seaparishtcouncil.org.uk/community/winterton-on-sea-parish-council-15212/get-involved/>
22. The supporting documents available included the SEA/HRA Screening Assessment and SEA Screening Opinion and the Evidence Base including Character Appraisal.
23. The website included the dates of the consultation and the various methods of commenting on the draft plan to encourage as many responses as possible. The website was updated to reflect the second period of consultation from 28 May to 9 July.



24. Hard copies of the draft plan were available to view in key places around the village. One of these places remained open throughout the consultation, including during lockdown. The six places the plan was available from included:
- Poppy's Post Office (open throughout lockdown)
  - The Dunes Café (closed for a period over lockdown)
  - Hermanus (closed for a period over lockdown)
  - The Fisherman's Return Pub (closed for a period over lockdown)
  - Loomes Stores (closed for a period over lockdown)
  - The Chip Shop (closed for a period over lockdown)
25. In addition, it was possible for people to request a hard copy of the plan by contacting the Parish Clerk or a member of the steering group by phone or email. One person requested a hard copy in this way.
26. An email was sent directly to each of the statutory consultees supplied by Great Yarmouth Borough Council, as listed above, meeting the requirements of Paragraph 1 of Schedule 1 in Regulation 14. This was sent on 19 March. A copy of this is provided in **Appendix H**. The email informed the statutory bodies of the commencement of the consultation period. These contacts involved numerous bodies and individuals that the Neighbourhood Plan working group and the Borough Council believed will be affected by the Neighbourhood Plan for Winterton-on-Sea, such as neighbouring parishes, key bodies such as Historic England and Natural England. The email notified consultees of the Neighbourhood Plan's availability on the website, alongside supporting materials, and highlighted several methods to submit comments.
27. Throughout the consultation it was possible for people to make representations by:
- Completing an online survey;
  - Filling in a hard copy of the survey or electronic version of the survey and sending this to the working group;
  - Providing feedback via letter or electronically to the working group.

## Responses

28. At the end of the consultation period there were 33 completed forms from local residents, either filled in electronically, by hand or online.
29. Five statutory consultees wrote to the working group with their comments on the draft plan, either in letter or email form.
30. The next section summarises the main issues and concerns raised and describes how these were considered in finalising the Neighbourhood Plan.



## Responses to the survey from local residents

Overall Support for the Plan	Yes			No	
I am generally in favour of the plan	26			7	
I would like to see changes to the plan	15			18	
Policy – To what extent do you agree with this?	Strongly Agree	Agree	Not sure	Disagree	Strongly Disagree
H01: Settlement boundary and residential development	1	21	4	5	0
H02: Housing Mix	7	14	4	3	3
H03: Affordable Housing	8	16	3	3	1
H04: Design	7	17	6	1	0
H05: Principal Residence Housing	16	10	1	1	3
H06: Tourist Accommodation	4	16	5	4	1
E1: Protecting and Enhancing the Environment	12	13	4	2	1
E2: High Grade Agricultural Land	6	18	4	2	1
E3: Promoting Winterton-on-Sea's Heritage	16	13	1	1	0
E4: Flooding and Drainage	14	12	4	1	0
CA1: Winterton-on-Sea Primary School	17	11	1	1	0
CA2: Economic Development	12	12	4	2	1
CA3: Local Green Space	18	10	2	0	0
CA4: Investment in Open Space	17	10	2	2	0
TR1: Public Car Parking	16	9	5	0	0
TR2: Residential Car Parking Standards	14	11	4	2	0
TR3: Walking	11	16	2	2	0

31. Overall there were 33 responses to the survey. Analysis of responses indicates that residents are generally in favour of the plan, with 79% indicating this in response. Forty-five percent of people said that they would like to see changes to the plan. The comments below provide an overview of responses and how these have been considered in finalising the plan.



Summary of comments received	How this was taken into account
<p><b>The Environment</b></p> <ul style="list-style-type: none"> <li>• Not enough focus on adapting to climate change</li> <li>• Plan should be more ambitious about reducing environmental impacts – ie low energy housing design, EV charging points mandatory</li> <li>• Limited mention of the impact of coastal erosion</li> <li>• Support for more green spaces to be created</li> <li>• Could we have a dark skies policy which restricts street lighting on new developments</li> <li>• Could key views be protected?</li> <li>• Suggestion of additional Local Green Spaces to be designated, Hermanus and the lighthouse</li> </ul>	<p>Adequate protection in policy terms already exists for environmentally important sites such as the Dunes. There is little in the plan about coastal erosion, which didn't come across particularly strongly in consultation to develop the plan. It is however, important in the context around visitor parking as the beach car park moves ever closer to the edge of the cliff. Additional text on this has been added in the traffic &amp; transport section.</p> <p>Requirement for electric vehicle charging points added to Policy HO4 on Design.</p> <p>Policy E1 stipulates that development will not be permitted where it results in harm to views of the dunes or beach from public viewpoints. Other viewpoints were considered by the Neighbourhood Plan group, but the decision was made just to include views of the dunes and beach.</p> <p>Potential areas for designation as Local Green Spaces were considered by the community as part of consultation in 2018. All of these were reviewed by the Neighbourhood Plan group, with a focus on protecting the spaces that meet the criteria and are truly cherished by the community. Neither the lighthouse or Hermanus meet the criteria required to be designated as Local Green Spaces.</p>
<p><b>Flooding</b></p> <ul style="list-style-type: none"> <li>• Important to restrict building on flood risk areas</li> <li>• Concern that despite E4 any development will have a negative impact on flooding of existing properties</li> </ul>	<p>National policy already restricts development in areas prone to flooding, so there is no need to repeat that in the plan. Policy E4 aims to ensure that adequate consideration is given to surface water drainage for all developments, including the need to demonstrate that it will not lead to increased flooding elsewhere.</p>
<p><b>Second homes and tourist accommodation</b></p> <ul style="list-style-type: none"> <li>• General agreement with the policy on Principle Residence Housing, with many respondents saying</li> </ul>	<p>We were very aware when developing the plan that there was a broad mix of views in relation to holiday accommodation and second homes. Policy HO5 which restricts second homes was developed in response to feedback about the impact of</p>



<p>that permanent occupancy of homes should be a priority.</p> <ul style="list-style-type: none"> <li>• Several questions about the accuracy of data on second homes / holiday lets and whether this could be open to challenge. The evidence base quotes different figures to the plan.</li> <li>• Very challenging to deliver the second home policy and will have minimal impact as growth will be limited and second home owners can purchase other property</li> <li>• Concern that the policies stifle investment and will lead to a decline in Winterton</li> <li>• Opinion more divided on supporting more holiday lets, some respondents felt there is already enough tourist accommodation</li> </ul>	<p>second home ownership, particularly where it means that properties are empty for much of the year. It is recognised that this does not apply unilaterally to all second home owners in the village, some of which make an enormous contribution to the community. The policy follows the methodology of tried and tested NP policies elsewhere, such as in Cornwall. Policy HO6 on tourist accommodation is a supportive policy, recognising the benefit of visitors to the economy, which is increasingly year-round, rather than just seasonal. This being the case, the impact of holiday accommodation is not the same as second home ownership which leads to properties being empty on a regular basis.</p> <p>The comments on evidence are justified, a supplementary evidence note on second / holiday homes has been developed and figures quoted in the plan in relation to council tax checked by Great Yarmouth Borough Council.</p>
<p><b>Housing Mix/Design</b></p> <ul style="list-style-type: none"> <li>• General support for affordable housing and this being important for attracting young families that would support the school</li> <li>• Some comments that affordable housing is being delivered elsewhere (Martham) and not required in the village</li> <li>• Housing mix – concern that HO2 will only apply to more than 5 dwellings. If there is growth it will probably be smaller numbers, which means the policy won't apply.</li> </ul>	<p>The plan is supportive of affordable housing as this was identified by residents (70% of respondents to a survey) as being important for attracting young families to the village to help create a balanced community and support the local primary school. Although affordable homes have recently been built in nearby villages, children from these homes will attend other schools and be part of those communities rather than Winterton.</p> <p>It is possible that there will be applications for developments of more than 5 dwellings put forward within the parish to which the housing mix policy will apply. We would not want to restrict small developments, such as those of 1 or 2 dwellings to be 2 bedrooms.</p>
<p><b>Travel and transport</b></p> <ul style="list-style-type: none"> <li>• Comments that addressing parking problems should have more weight in the plan</li> </ul>	<p>Parking is recognised as the most significant issue within WoS at the current time, with visitors regularly blocking junctions and driveways. This impacts upon quality of life for residents and the attractiveness of Winterton. As WoSNP is a planning document, policies need to be directed at future growth and development within</p>



<ul style="list-style-type: none"> <li>• Many suggestions of how to address parking problems through restrictions, permits, etc</li> <li>• Concern that additional parking as per Policy TR1 would result in additional footfall on the dunes</li> <li>• Unrealistic for new businesses in the village centre to provide parking – will prevent development, instead should be a focus on better public parking close to the village centre</li> </ul>	<p>the village and mitigating any impact of this. The options in relation to addressing existing parking and traffic management issues are more limited, except in relation to community actions. A community policy has been included in recognition of the importance of addressing parking problems in the village. As part of this, all traffic management options will be considered, working with other partners.</p> <p>The intention behind Policy TR1 is to support additional off-road parking to help reduce the level of visitor parking on-street. This would be delivered alongside community actions to introduce parking restrictions, therefore likely not to increase the level of visitors by a significant margin. This was considered by Great Yarmouth Borough Council and Natural England when determining that an HRA was not required on the plan.</p> <p>It's essential that additional traffic or parking pressures are considered when new business activities are planned for the village centre. In recognition that the proposed policy may be too restrictive, the policy has been amended slightly with an 'or' added between the two bullet points. This gives some scope for applicants to make a case about either parking or traffic.</p>
<p><b>Policies too restrictive for development</b></p> <ul style="list-style-type: none"> <li>• Some comments that the plan is too restrictive in terms of supporting development</li> <li>• An extension of the development limits supported by some</li> </ul>	<p>The housing requirement for Winterton-on-Sea in the Great Yarmouth and Broads Local Plans is zero due to the environmental sensitivity of the area. Whilst WoSNP does not allocate, it is supportive of development that meets the needs of the community, for example affordable housing, tourist accommodation, new business and off-road car parking options. It seeks to ensure that any new development is delivered in a way that does not impact on areas of environmental importance and does not take land that contributes towards the rural economy as productive agricultural land. A decision was made by the Neighbourhood Plan group not to allocate or extend the development limits.</p>
<p><b>Walking Routes</b></p> <ul style="list-style-type: none"> <li>• Significant support for a safe off-road walking route to Hemsby</li> </ul>	<p>A community policy has been added around investigating re-opening the former PRoW between Winterton &amp; Hemsby.</p>
<p><b>The School</b></p> <ul style="list-style-type: none"> <li>• General support for protecting school</li> </ul>	<p>The school does have parking provision within the grounds that could accommodate the requirements of additional activities. Though the</p>



<ul style="list-style-type: none"> <li>Some concerns raised about the impact on parking of any new complementary use</li> </ul>	neighbourhood plan group were mindful of impacts on parking it was felt that this should not be a reason to restrict what the school is trying to achieve in terms of becoming more sustainable. A new requirement for a travel plan associated with new uses has been added to the policy.
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## Responses Received from Statutory Consultees

### Great Yarmouth Borough Council

Any typos were automatically made and are not referenced in the table below.

	Comments	How this was considered
<b>General Points</b>	<p>P5 – update with brief summary and link to the Consultation Statement</p> <p>P16 – use full titles for environmental designations</p> <p>Pages 25-27, Suggest that green spaces referenced in the supporting text, are matched to the reference numbers on the map provided.</p> <p>Page 29, Community policy [an ambition?] - Such policies tend to get separated (to the back of the document) from the neighbourhood plan policies to avoid confusion with planning policies. There could, however, be a link in the supporting text to this ambition.</p>	<p>Amended</p> <p>Amended</p> <p>Agree, amended</p> <p>Decision to keep within the flow of the document rather than as an appendices.</p>
<b>Comments on Policies</b>		
H01: Settlement boundary and residential development	<p>Should be removed, it is contradictory and conflicts with local and national policy:</p> <ul style="list-style-type: none"> <li>Emerging Policy GSP1 of Local Plan Part 2 sets out the Borough Council's approach to development limits and this is not consistent with it</li> </ul>	The intention behind this policy is to provide developers with some certainty as to how their applications will be considered in the absence of a 5YHLS. It has not been removed but we've sought to improve it and ensure general conformity. It now reads:



	<ul style="list-style-type: none"> <li>• This policy could also be considered out of date in the absence of a five-year housing land supply</li> <li>• Cross references to NPPF and NPPG are unnecessary as they will be considered irrespective to reference in this policy</li> <li>• 50m is arbitrary, what is the evidence for this?</li> <li>• This policy point directly contradicts the purpose of the Development Limits if its 50m outside of it</li> <li>• What if a site of 1ha outside the Development Limits could provide significant benefits to the settlement?</li> <li>• Entry-level exception sites are covered in national policy, there is no need to repeat the requirements here.</li> </ul>	<p><i>HO1: Open Market Housing Outside the Development Limits</i></p> <p><i>For applications involving the provision of open-market housing outside of the development limit in those circumstances where, for whatever reason, the application of the development limit can be afforded only limited weight and NPPF Paragraph 11d is triggered, the Neighbourhood Plan will only be supportive where the proposed development:</i></p> <ul style="list-style-type: none"> <li>• <i>Is adjacent to the development boundary;</i></li> <li>• <i>Does not represent a significant encroachment into the open countryside;</i></li> <li>• <i>Is of a small enough scale to be proportionate to the village;</i></li> <li>• <i>Allows future occupiers good access by walking to the services and facilities in the village; and</i></li> <li>• <i>Is consistent with other applicable policies in the development plan.</i></li> </ul> <p>In reference to other points, Figure 3 has been removed and all reference to settlement boundary have been changed to development limits.</p>
H02: Housing Mix	<ul style="list-style-type: none"> <li>• Note emerging Local Plan Part 2 Policy A2 requires all housing to be M4(2) adaptable homes standards, this would more than meet the 25% standard suggested in this policy, and will weaken the Local Plan requirement. This requirement should be removed</li> </ul>	Removed reference.



	from the neighbourhood plan policy if the principle is supported by the parish council.	
H03: Affordable Housing	<p>HO3 is contrary to national and local planning policy:</p> <ul style="list-style-type: none"> <li>Paragraph 71 of the NPPF sets out how entry-level sites will be supported. There is no need to repeat or contradict these.</li> <li>Policy CS4 of the Core Strategy sets out similar details under criteria d), this policy requires sites to be adjacent the settlement (not within 50m of the boundary).</li> </ul>	<p>The policy is slightly different to Para 71 of the NPPF, providing a local flavour, which is felt to have due regard to and be in general conformity with the NPPF. The legal interpretation from a barrister at No.5 Chambers<sup>1</sup> is that:</p> <p>With regard to basic condition (a), a requirement to have regard to policies and advice is not a consistency test and does not require that such policy and advice must necessarily be followed; but it is intended to have and does have an effect. Examiners must use their judgement to determine whether or not it is appropriate that an NDP shall proceed “<i>having regard to</i>” national policy.</p> <p>The 50m reference is Winterton’s definition of adjacent the development limit.</p>
H04: Design	<ul style="list-style-type: none"> <li>The policy could be shortened and made clearer and more concise.</li> </ul>	Noted.
H05: Principal Residence Housing	<ul style="list-style-type: none"> <li>How can this policy can be practically enforced? It will require a tight definition and clarity on the types of evidence that will need to be provided, for example, if a house is sold and then used as a second home – what action can be taken? What is ‘on-going evidence’? – Who will be looking at this?</li> </ul>	<p>1<sup>st</sup> bullet - The purpose of this policy is to support a sustainable community. The restriction would be imposed using a planning condition or legal agreement. Further text has been included in the policy to clarify the evidence that occupiers would be required to provide:</p>

<sup>1</sup> Interpretation received as part of a Healthcheck on Tilney All Saint’s Neighbourhood Plan



	<ul style="list-style-type: none"> <li>• ‘New unrestricted second homes will not be supported at any time’ – this may not be supported by an Examiner or Planning Inspectors</li> <li>• Further evidence may be required – e.g. scale of impact, change over time, appropriateness over whole neighbourhood plan area</li> <li>• The supporting text on page 15 is confusing where it refers to supporting tourist and visitor facilities outside of limits.</li> </ul>	<p>Occupiers of homes with a Principle Residence condition or obligation will be required to keep proof that they are satisfying the requirements as set out in this policy and will be obliged to provide this proof if/when Great Yarmouth Borough Council requests this information. Proof of Principal Residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc).</p> <p>2<sup>nd</sup> bullet – agree, removed.</p> <p>3<sup>rd</sup> bullet – this is contained within the supplementary evidence base on second/holiday homes.</p> <p>4<sup>th</sup> bullet - Supporting text has been amended to avoid confusion.</p>
HO6: Tourist Accommodation	No comments	
E1: Protecting and Enhancing the Environment	<ul style="list-style-type: none"> <li>• As current worded “Proposals which specifically promote the preservation and restoration of the dunes and beach at Winterton-on-Sea will be supported.” - this is contrary to the NPPF, paragraph 175, where development on such land ‘should not normally be permitted’ and should be removed. The current wording opens the door to development.</li> <li>• Note – that biodiversity net gain is due to be a legislative requirement shortly, there is no need to repeat this in policy</li> </ul>	<p>1<sup>st</sup> bullet – removed reference</p> <p>2<sup>nd</sup> bullet – as this is not yet a legislative requirement it has remained in the NP policy. There is reference to emerging legislation in supporting text which includes ‘a 10% net gain will be applied unless a higher standard is required by the Environment Bill’.</p>



E2: High Grade Agricultural Land	<ul style="list-style-type: none"> <li>Suggest re wording: ‘...agricultural land that is viable arable land where the following exceptional circumstances can be demonstrated:’</li> </ul>	Change made
E3: Promoting Winterton-on-Sea’s Heritage	No Comments	
E4: Flooding and Drainage	<ul style="list-style-type: none"> <li>Suggest re-titling policy ‘Surface water flooding and drainage’ as this policy does not address other forms of flooding, each of which are addressed in local and national policy.</li> <li>Requiring a Surface Water Drainage Strategy in areas of low flood risk could be excessive, this goes beyond national policy thresholds (such as sites 1ha and above)</li> </ul>	1 <sup>st</sup> bullet – title amended 2 <sup>nd</sup> bullet – that is recognised, but policy wording developed in conjunction with the LLFA, and NP required to be in general conformity, not necessarily copy the NPPF
CA1: Winterton-on-Sea Primary School	<ul style="list-style-type: none"> <li>Suggest changing to: ‘Proposals for complementary alternative uses of the primary school and nursery grounds will be supported where they maintain its principle function as an education facility and benefit the wider community.’</li> </ul>	Amendment made
CA2: Economic Development	<ul style="list-style-type: none"> <li>Note, this policy could be extremely restrictive in promoting economic development, such as tourist type facilities where they lead to material increases in traffic.</li> </ul>	Noted, however parking is the most significant issue within WoS at the current time, with visitors regularly blocking junctions and driveways. This impacts upon quality of life for residents and the attractiveness of Winterton. Therefore, it is really important that additional traffic/parking implications are considered fully when determining applications for new business activities. In recognition that the proposed policy may be too restrictive, the policy has been amended slightly



		with an 'or' added between the two bullet points. This gives some scope for applicants to make a case about either parking or traffic.
CA3: Local Green Space	No comments	
CA4: Investment in Open Space	<ul style="list-style-type: none"> <li>The Borough Council sets out the requirements for the provision of new open space. Depending upon the scale of development and functionality of open space, it will be negotiated on a site by site basis as to whether open space is provided onsite or a contribution is made for off-site provision. On this basis, the policy should be reworded: 'Contributions for off-site open space provision will be prioritised to improve local facilities where these are well related to the development, these include: <ul style="list-style-type: none"> <li>Designated Local Green Spaces</li> <li>Existing Public Rights of Way...</li> </ul> </li> </ul>	Change made
TR1: Public Car Parking	No comments	
TR2: Residential Car Parking Standards	No comments	
TR3: Walking	No comments	

### **Responses from the Broads Authority**

#### **General Comments**

<b>Comments</b>	<b>How this was considered</b>
1. Various references to the Broads Authority omitted	1. All references to the Broads Authority added as requested



<p>2. Page 7: The NP says: 'The neighbourhood plan does not plan to allocate land for residential development, but is supportive of small-scale development within the settlement boundary, as well as conversions and exception sites outside of the boundary'. What do you mean when you support conversions outside of the boundary? To what does it refer to and does that accord with GYBC and BA policy? In terms of the BA, any development outside of a development boundary for residential purposes is not likely to be supported, as set out in our adopted strategic policies. This part of the text is not clear and therefore could be contrary to the strategic policies of the Local Plan for the Broads (SP15).</p> <p>3. As part of BA discussions of responding to climate change pressures we have talked of trying to encourage living, working and holiday activities that will not require cars. Hence I wonder why the Plan does not conclude after the section on public transport in the plan, that it needs to be developed and improved. The government have recognised that they want to strengthen local transport including buses, so it's not an unreasonable aspiration to hope for better services.</p> <p>4. There is very little mention of the BA and the proximity of Winterton to the Broads, despite this proximity being relevant to the attractiveness of the location and to planning processes.</p> <p>5. Given the importance of the habitats directly within the plan area, the addition of a few further details seems appropriate.</p> <ul style="list-style-type: none"> <li>• P15 The dunes, <b>dune grassland</b>, <b>dune heath</b> and beach at Winterton-on-Sea give ...</li> <li>• P27 spelling of <b>Natterjack</b> toads at Bulmer Pit</li> <li>• To provide a stronger link to the HRA, it would also be helpful to mention the Little Terns and the seals in the introduction.</li> </ul> <p>6. Section 4 needs to be clearer about which local plan this wording refers to. The first paragraph of section four therefore needs to refer to GY Local Plan.</p> <p>7. Page 7: para at bottom starting with 'furthermore...'. I am not sure why this is mentioned. GYBC have an up to date Local Plan and are preparing a second part to</p>	<p>2. Amended para 26 to take out the text on conversions and exception sites, replaced this with 'small scale and appropriate development that accords with the policy framework'</p> <p>3. Added in a para on public transport and visitors, and the need for improvements to be delivered.</p> <p>4. Added into the introduction, final para</p> <p>5. Added</p> <p>6. Added Great Yarmouth</p> <p>7. Sentence removed</p> <p>8. Similar comment made by GYBC, reference to lifetime homes removed.</p> <p>9. The supporting evidence has been updated in para 46 and now links to a supplementary evidence note on second / holiday homes.</p> <p>10. 'to require that' removed</p> <p>11. Some details added – hourly bus service, lack of safe off-road walking route</p> <p>12. Changed to say a quarter of local people work in Winterton, rather than expressing that this is high</p> <p>13. Moved the text to the Design policy HO4, but it is also referenced in TR3.</p>
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<p>it. The Broads Authority also has an up to date local plan. This wording is therefore not relevant and seems to cast doubt on the status of relevant local plans.</p> <p>8. Page 11: reference to lifetime homes. This has been replaced by optional building regulations standard M4(2) and M4(3). The Local Plan for the Broads has a standard relating to M4(2) and M4(3). GYBC Local Plan may. This policy may not be justified and may need changing.</p> <p>9. Page 14 says: 'The fairly high level of holiday and second homes in Winterton-on-Sea has resulted in perceived negative impacts on residents'. What is the data? How many homes (%) are second and holiday homes?</p> <p>10. Page 15 says ' Typically, these will take the form of a requirement for the removal of temporary structures at appropriate intervals, and holiday occupancy conditions placed on un-serviced holiday accommodation or sites to require that.'. Is the sentence finished? I don't understand the reference to 'that'.</p> <p>11. Page 22: access to Hemsby Medical Centre by bus - how often are the buses there and back? Is there a walking route?</p> <p>12. Page 23: is 25% of people living and working in Winterton really high? High compared to what? Without context or comparison, 25% seems low.</p> <p>13. Page 31 says: 'To promote sustainable access, applications within or next to the settlement boundaries should, where reasonable to do so, be able to demonstrate that the site is accessible by walking and that future occupiers will be able to walk to most of the local services and facilities and to a bus stop'. This needs to be policy wording and included in the housing policies. When you say reasonable, do you mean feasible or practicable?</p>	
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<b>Comments on the Policies</b>		
H01: Settlement boundary and residential development	<ul style="list-style-type: none"> <li>This policy refers to 50m from a settlement boundary and treats up to 50m from a settlement boundary as 'adjacent'. 50m away is not adjacent; it is 50m away. The term 'adjacent' means next to or</li> </ul>	The intention behind this policy is to provide developers with some certainty as to how their applications will be considered in the absence of a 5YHLS. We have sought to improve the policy in response to feedback and ensure general conformity. It now reads:



	<p>adjoining something. We do not agree with this assumption.</p> <ul style="list-style-type: none"> <li>The wording of the policy seems to undermine the policies in the local plans that are in place or soon to be in place. It is not clear why this approach is needed when GYBC is making good progress on its Local Plan and the Local Plan for the Broads is adopted.</li> <li>You have used the 1ha and 5% rule that the NPPF applies to entry level exception sites only to all development. How many houses are in the settlement boundary of Winterton on Sea? What is 5% of that? What does that mean for the density of these extensions? What evidence is there that the 1ha and 5% rule is justified in how it is being used in this NP – small scale rural housing schemes?</li> <li>To allow small scale rural housing schemes outside of the development boundary is contrary to the Local Plan for the Broads (SP15) and may be contrary to the NPPF.</li> </ul>	<p><i>H01: Open Market Housing Outside the Development Limits</i></p> <p><i>For applications involving the provision of open-market housing outside of the development limit in those circumstances where, for whatever reason, the application of the development limit can be afforded only limited weight and NPPF Paragraph 11d is triggered, the Neighbourhood Plan will only be supportive where the proposed development:</i></p> <ul style="list-style-type: none"> <li><i>Is immediately adjacent to the development boundary;</i></li> <li><i>Does not represent a significant encroachment into the open countryside;</i></li> <li><i>Is of a small enough scale to be proportionate to the village;</i></li> <li><i>Allows future occupiers good access by walking to the services and facilities in the village; and</i></li> <li><i>Is consistent with other applicable policies in the development plan.</i></li> </ul>
H02: Housing Mix	No comments	
H03: Affordable Housing	<ul style="list-style-type: none"> <li>To allow small scale rural housing schemes outside of the development boundary is contrary to the Local Plan for the Broads (SP15). The strategic policies of the Local Plan for the Broads would only support such small scale rural development in certain circumstances (like a rural enterprise</li> </ul>	<p>1<sup>st</sup> bullet – The policy allows for small-scale affordable housing proposals only, not market housing. As the BA Exec area is further than 50m of the WoS development limit, it is not felt to be contrary to SP15.</p> <p>2<sup>nd</sup> bullet – This is a policy about affordable housing specifically not open market development.</p>



	<p>dwelling), but this policy seems to allow any small scale rural development.</p> <ul style="list-style-type: none"> <li>• To incorporate small scale rural housing sites and entry level exception sites in the same policy is confusing - they are not the same thing and have different policy approaches. Entry Level Housing is an established national policy approach and is something addressed in the NPPF. Small scale rural development is a local policy approach and is contrary to the Local Plan for the Broads and contrary to the general thrust of the NPPF.</li> <li>• I query again the 50m distance used as the NPPF at para 71b in relation to entry level exception sites again uses the word 'adjacent' and again, adjacent means adjoining or next to.</li> <li>• Notwithstanding the fundamental issues raised, if the site is no more than 50m from the development boundary of Winterton on Sea, are people really going to get on a bus to travel to the centre of Winterton on Sea? So is quoting public transport really relevant? It seems the policy needs to be clear and say access by walking and cycling only. Although, as mentioned a few times previously, 50m from the site is not adjacent to it.</li> <li>• Notwithstanding that the Broads may be further than 50m from the settlement boundary and also the previous comments on conflict with SP15, a reference to footnote 34 on page 19 of the NPPF needs to be made, if the 50m rule is kept in</li> </ul>	<p>3<sup>rd</sup> bullet – the dictionary definition of adjacent is very near, next to or touching. For the avoidance of doubt the NP would like to define adjacent as within 50m of the development limit. Additional supporting text has been added with respect to this.</p> <p>4<sup>th</sup> bullet – The policy references sustainable means of transport which could include walking and cycling, there is no reference specifically to public transport</p>
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	(although see previous - it seems contrary to the NPPF).	
H04: Design	No comments	
H05: Principal Residence Housing	No comments	
H06: Tourist Accommodation	<ul style="list-style-type: none"> <li>The Local Plan for the Broads has policies relating to the location of tourism development (SP12, DM29 and DM30) that set out specific criteria. This statement seems to imply that tourism development can go anywhere. This is contrary to the Local Plan for the Broads. This is an area of concern.</li> <li>What is 'new tourist accommodation that supports the local economy'? How would Development Management Officers test if the new holiday accommodation supports the local economy? Is this a policy requirement? Is it superfluous?</li> <li>What is 'semi-permanent'?</li> <li>Page 15 says: 'However, the policy also supports proposals outside of the settlement boundary, especially for the conversion of existing buildings, including farm buildings: this is because not all the needs for new tourist and visitor facilities can be met within the village and other types of accommodation may be needed outside to meet new visitor expectations'. I cannot see those words in the policy HO5 - I am confused. Or should the start of this paragraph refer to HO6? The Local Plan for the Broads has policies relating to the location of tourism development (SP12, DM29 and DM30) that</li> </ul>	<p>1<sup>st</sup> bullet – added text to specify that the policy applies outside of the BA Exec area.</p> <p>2<sup>nd</sup> bullet – removed 'supports the local economy'</p> <p>3<sup>rd</sup> bullet – eg camping pitches available on a seasonal basis</p> <p>4<sup>th</sup> bullet – clarified this, the first sentence refers to HO5, but the rest of the para is for HO6.</p>



	<p>set out specific criteria. This statement seems to imply that tourism development can go anywhere. This could be contrary to the Local Plan for the Broads.</p>	
E1: Protecting and Enhancing the Environment	<ul style="list-style-type: none"> <li>Should this reference the Broads that has a status equivalent to a National Park?</li> </ul>	Added a reference to the Broads as being a part of what makes the area special, but decision for the policy just to reference designated areas within the parish boundary
E2: High Grade Agricultural Land	<ul style="list-style-type: none"> <li>It is not clear why this policy cannot apply to The Broads area as well, but with mention of 3a. That being said, the colour used for 2 and 3 is similar so it is not that clear whether the swathe of land that goes into the Broads is 2 or 3 - this might be a moot point. Suggest better colours are chosen that are more easily distinguishable.</li> </ul>	The initial policy wording was changed to reflect previous feedback from the Broads Authority that the policy was contrary to the Broads Local Plan as it does not protect 3a. Locally a decision has been made to protect 1 and 2, therefore it applies outside of the Broads area to ensure general conformity.
E3: Promoting Winterton-on-Sea's Heritage	<ul style="list-style-type: none"> <li>Are you creating a new area of importance - the Historic Village Centre? So what is so special about the Historic Village Centre? What should development do to be in keeping? Where does the Plan set out standards or criteria? How does this area work with the conservation area? How does a would-be developer know what to do to meet the requirements of this policy?</li> </ul>	This is covered by the Character Appraisal (Appendix to the Evidence Base) which was undertaken to support production of the Neighbourhood Plan. Reference now made to this in the supporting text.
E4: Flooding and Drainage	<ul style="list-style-type: none"> <li>What does this policy add to the NPPF and local plans for the Broads and GYBC? Is it needed? What do developments of fewer than five have to do in relation to surface water? Our Local Plan (policy</li> </ul>	This policy was developed with support from the Lead Local Flood Authority who recommended the threshold of 5 dwellings be included. The policy sets criteria for when a surface water drainage strategy is required.



	DM6) says that all development needs to incorporate measures to attenuate surface water.	
CA1: Winterton-on-Sea Primary School	<ul style="list-style-type: none"> <li>The intentions of this policy are not clear. What kind of things will encourage the school's sustainability? The second part - does that apply if the school is developed for something else?</li> </ul>	New policy wording proposed: <i>Proposals for complementary alternative uses of the primary school and nursery grounds will be supported where they maintain its principle function as an education facility and benefit the wider community. A travel plan that encourages sustainable travel and considers parking management will be required to support any proposal.</i>
CA2: Economic Development	No comments	
CA3: Local Green Space	No comments	
CA4: Investment in Open Space	No comments	
TR1: Public Car Parking	No comments	
TR2: Residential Car Parking Standards	No comments	
TR3: Walking	No comments	



## Responses from all other Statutory Consultees

Statutory Consultee	Summary of Comments Received	How these were considered
Norfolk Coast Partnership	<p>As the AONB is a national designation some villages have included a specific policy relating to protection of the AONB such as Holme-next-the-Sea in West Norfolk. We can send you a link to the plan of you are interested to have a look.</p> <p>Our Landscape Character Assessment may also be of use to you in terms of understanding which landscape character type you fall in and the sensitivities to change. You can find the map here: <a href="http://www.norfolkcoastaonb.org.uk/partnership/landscape-character-types-key-map/444#">http://www.norfolkcoastaonb.org.uk/partnership/landscape-character-types-key-map/444#</a></p>	It is considered that elements of this are already included within the plan and the range of policies in encompasses, therefore a separate policy is not warranted.
Historic England	<p>We welcome the inclusion of the sub-section “Historic Environment and Local Character”, and the maps included are useful in identifying the areas designated as conservation areas, as well as the Historic Village Core. We would suggest that these maps could also show listed buildings and any other types of heritage assets, and that they could be made larger – at least half a page – to aid legibility.</p> <p>We also welcome the inclusion of policy E3, the aim of which is clearly articulated. We would make one or two suggestions as to how it could be enhanced to help it protect Winterton’s local heritage. For example, where are elements of landscape setting, open spaces etc it mentions ‘identified’? If this is in a conservation area appraisal, then we recommend making reference to this document in the policy, and require applicants to demonstrate that they have made reference to it in formulating development proposals or their design. If there is no such document, then you could identify these elements in a character study, which could be provided as an appendix to the neighbourhood plan.</p> <p>Additionally, the intention to conserve the centre of Winterton is very welcome, but, bearing in mind that neighbourhood plans should not replicate the policy protections</p>	<p>Amended as suggested</p> <p>A conservation area appraisal does not exist</p> <p>A character assessment has been undertaken and is</p>



	<p>provided at local and national levels, we wonder whether the current way in which you have designated an area as the Historic Village Core provides any additional protection to it, in view of its existing designation as a conservation area. A character study may provide additional evidence to support this designation, which you could then include to better define what elements of this area should be protected. We would also recommend that the word 'aim' is removed from the last sentence of the policy, which would strengthen it.</p> <p>Your plan could include a bit more information about individual local "non-designated" heritage assets.</p> <p>If appropriate, your plan could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are "at risk", or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement, which would constitute a positive strategy in these cases.</p> <p>In section 6 your plan identifies "Community Assets", including obviously well-loved local buildings including the Post Office and the Fisherman's Return. We would encourage you to take this section of the plan further, and use the neighbourhood plan process to formally identify "Assets of Community Value" in the neighbourhood area. Formal Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. We encourage this owing to the fact that often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved.</p>	<p>available as part of the evidence base. Reference to this has now been made in the plan – para 65.</p> <p>'Aim' removed from the last sentence of the policy</p> <p>Decision not to add more information about non-designated assets, Grade II listed buildings or Community Assets at the current time but to consider this at the first review point of the plan.</p>
Norfolk County Council – infrastructure delivery	<p>The Neighbourhood Plan could contain supporting text referencing the following;</p> <ul style="list-style-type: none"> <li>Housing and other development will be expected to contribute towards improving local services and infrastructure (such as transport, education; library provision, fire hydrant provision, open space etc.) through either the payment of a Community Infrastructure Levy (CIL); planning obligations (via an s106 agreement / s278 agreement); or use of a planning condition/s.</li> </ul>	<p>Noted, added text in relation to improving local services. Decision not to include the requirement to install sprinklers for all new developments.</p>



	<ul style="list-style-type: none"> <li>Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments. Sprinklers have a proven track record to protect property and lives. It would therefore be helpful if the emerging Neighbourhood Plan could refer to the installation of Sprinklers in new developments.</li> </ul>	
Norfolk County Council – Historic Environment	Links to general guidance provided. No specific comments on the plan.	Noted.
Norfolk County Council – Lead Local Flood Authority	<p>The Lead Local Flood Authority (LLFA) welcome the information demonstrated in the section 'Flood Risk and Drainage' (Page 21-22) with specific reference to information in 'Policy E4: Flood and Drainage', highlighting the use of SuDS as the first choice of surface water drainage including the use of on-site water storage.</p> <p>The LLFA welcome that surface water flood risk has been highlighted in the provided Plan, with reference to road names where surface water flooding is an issue.</p> <p>The LLFA welcome concerns raised about the potential impacts on drainage and surface water from construction of new housing or alterations to existing housing.</p> <p>The LLFA agree that any future developments must demonstrate positive impact to the community and not increase the risk of flooding with appropriate mitigation measures where applicable.</p> <p>The LLFA have 4 records of external flooding in the Parish of Winterton-on-Sea dating from 2012 and 1 record of internal flooding in the Parish of Winterton-on- Sea dating from 2014. The LLFA highlight the importance of considering surface water within the Plan in the best interest of further development in the area.</p>	



	<p>The LLFA recommend reference to our Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for Planning: Guidance Document regarding surface water risk and drainage for any allocated sites or areas of proposed development (see link in 4.7).</p> <p>The LLFA recommend inclusion of a separate surface water flooding map within the Neighbourhood Plan for Rollesby. Information on this and associated tools /reference documents can be found at:</p> <ol style="list-style-type: none"> <li>1. GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map</li> <li>2. Norfolk County Council (NCC) – Flood and Water Management Policies</li> <li>3. Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for Planning: Guidance Document</li> </ol> <p><b>The LLFA would recommend the following to be included with regards to surface water flood risk:</b></p> <p>The Neighbourhood Plan requires that any future development (or redevelopment) proposals show there is no increased risk of flooding from an existing flood source and mitigation measures are implemented to address surface water arising within the development site.</p> <p>Any new development or significant alteration to an existing building within the Parish of Rollesby should be accompanied by an appropriate assessment which gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage. Any application made to a local planning authority will be required to demonstrate that it would:</p> <ul style="list-style-type: none"> <li>• Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources.</li> <li>• Have a neutral or positive impact on surface water drainage.</li> </ul>	<p>Some text added to WNP to reflect this evidence.</p> <p>Reference added</p> <p>Map not included as it provides just a snapshot in time of flood risk.</p> <p>The policy contains similar requirements to this as developed with guidance from the LLFA. Additional text not considered to add anything.</p>
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	<ul style="list-style-type: none"> <li>Proposals must demonstrate engagement with relevant agencies and seek to incorporate appropriate mitigation measures manage flood risk and to reduce surface water run-off to the development and wider area such as: <ul style="list-style-type: none"> <li>Inclusion of appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk).</li> <li>Where appropriate undertake sequential and /or exception tests.</li> <li>Locate only compatible development in areas at risk of flooding, considering the proposed vulnerability of land use.</li> <li>Inclusion of appropriate allowances for climate change.</li> <li>Inclusion of Sustainable Drainage proposals (SuDS) with an appropriate discharge location.</li> <li>Priority use of source control SuDS such as permeable surfaces, rainwater harvesting and storage or green roofs and walls. Other SuDS components which convey or store surface water can also be considered.</li> <li>To mitigate against the creation of additional impermeable surfaces, attenuation of greenfield (or for redevelopment sites as close to greenfield as possible) surface water runoff rates and runoff volumes within the development site boundary.</li> <li>Provide clear maintenance and management proposals of structures within the development, including SuDS elements, riparian ownership of ordinary watercourses or culverts, and their associated funding mechanisms.</li> </ul> </li> </ul> <p><b>ALLOCATION OF SITES IN A NEIGHBOURHOOD PLAN</b></p> <p>The LLFA expects that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. If a risk of flooding is identified then a sequential test, and exception test are required to be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.</p>	<p>No sites being allocated.</p>
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	<p><b>LLFA Review of Local Green Spaces (LGS)</b></p> <p>The document proposes a number of pre-existing open spaces as local green spaces (LGS). It is understood that designation of LGS provides a level of protection against development. The LLFA do not normally comment on LGS unless they are/are proposed to be part of a sustainable urban drainage (SuDS) feature. Two of the named spaces are identified as being potential present surface water soakaway features:</p> <ul style="list-style-type: none"> <li>• Duffles Pond</li> <li>• Bulmer Pit</li> </ul> <p>The LLFA would therefore recommend against development of these spaces to limit any negative impact on their current drainage contributions. The LLFA have no comments to make on all other submitted open spaces.</p>	Reference to Duffles Pond and Bulmer Pit being existing SuDS features made in the policy and supporting text.
Norfolk County Council, Transport	Policy TR3 Walking (page 31) refers to a minimum footway width of 1m. There is a concern that this is not sufficient as a policy requirement. The Highway Authority would want the policy to refer to a minimum width of 1.5m, acknowledging that the actual width will be determined through any application, determined by the site use, the nature of the adjacent highway and location.	Amendment made.



## Appendix A:



# WINTERTON-ON-SEA NEIGHBOURHOOD PLAN

## HAVE YOUR SAY!

**MONDAY 26TH NOVEMBER 2018**

**2PM - 6PM**

**WINTERTON VILLAGE HALL**

We will be hosting a drop-in session so you can find out all about Neighbourhood Planning and what it means for

Winterton. This is **YOUR** opportunity to have your say on future development of the village and to find out how you can shape and influence policies which will affect us for many years to come.

### Can't make the session?

<http://wintertonparishcouncil.norfolkparishes.gov.uk/neighbourhood-plan/> to find out more, including how you can participate in our consultation and survey. Or contact the Parish Clerk on [clerkwinterton@gmail.com](mailto:clerkwinterton@gmail.com), or telephone 07918 978921.

*Qualifying Body: Winterton-on-Sea Parish Council*





## Appendix B: Issues and Options Consultation Survey (Front Page)

# Winterton-on-Sea Neighbourhood Plan

## Issues & Options Consultation

## Make YOUR Views Count



### What is a Neighbourhood Plan

A Neighbourhood Plan is a community led framework for guiding future development, growth and conservation of an area. It will form part of the statutory development plan that is used to determine planning applications.

### Do we really have a say?

This is a real opportunity to have an active say on the future of Winterton-on-Sea. We need your help identifying the issues and options for dealing with them, your input is vital. Remember the plan will only be adopted after a local referendum of the parish.

### Progress so far

A steering committee was formed in August 2017 to take the plan forward and we have provided regular updates in the parish newsletter. In May 2018 we were successful in attracting funding to support the plans development and have used this to undertake an evidence base that has helped identify key issues.

### Please complete this questionnaire!

Come to our drop in session on Monday 26th November 2018, 2pm - 6pm at Winterton Village Hall. View the consultation at:

<http://wintertonparishcouncil.norfolkparishes.gov.uk/neighbourhood-plan/>

or request a hard copy from the Parish Clerk on [clerkwinterton@gmail.com](mailto:clerkwinterton@gmail.com), or call 07918 978921.

**This survey can be completed electronically!**

<http://wintertonparishcouncil.norfolkparishes.gov.uk/neighbourhood-plan/>





## Appendix C: Consultation Event Write Up

### Winterton-on-Sea Issues & Options Consultation Event 26 November 2018

#### Introduction

The Issues & Options Consultation Event was held at the Village Hall from 2pm-6pm. It had been advertised in advance via posters and the village newsletter. Over the course of the 4hrs 60 people dropped in, read draft material and asked questions of the Neighbourhood Plan Steering Group. An attendance register was taken. All attendees were given a consultation questionnaire and encouraged to contribute towards a SWOT analysis and 'ideas wall'.



Wordall of 'strengths' from the SWOT analysis

#### SWOT Analysis

Completed by consultation event attendees, 26/11/18

Strengths	Weaknesses
<ul style="list-style-type: none"><li>• Really friendly people</li><li>• Good community</li><li>• Peace and quiet – the village atmosphere</li><li>• Friendly, supportive environment, feels safe</li><li>• Community cohesion</li><li>• Good community</li><li>• Natural beauty</li><li>• Biodiversity</li><li>• Great village for birdwatching</li><li>• Lovely skies at night due to low artificial light</li><li>• Dunes and the valley</li><li>• Undisturbed views</li><li>• Scenery, light and the air</li><li>• Very few street lights</li><li>• Good local shops and facilities for a small village</li><li>• Post office</li><li>• Carers Group</li><li>• Support for the school</li></ul>	<ul style="list-style-type: none"><li>• Too many holiday homes</li><li>• Not enough low cost rental homes for young families</li><li>• Not enough homes for young people so they can start a family and keep the school open</li><li>• Majority of homes un-occupied in Winter</li><li>• Holiday lets in residential areas – many houses in darkness, makes an area feel unsafe and unfriendly</li><li>• Poor quality recent development</li><li>• Lack of new housing</li><li>• Poor bus service to Norwich</li><li>• Too many cars in the village with not enough parking</li><li>• Lack of parking in the centre</li><li>• Cars travelling too fast through the village</li><li>• The heavy traffic on the lane, coaches use it</li><li>• Speed of cars in the village</li><li>• Not enough accessible footpaths</li></ul>

Collective Community Planning  
November 2018



## Winterton-on-Sea Issues & Options Consultation Event 26 November 2018

<ul style="list-style-type: none"> <li>• School</li> <li>• Play park</li> <li>• Affordable for first time buyers and young families</li> </ul>	<ul style="list-style-type: none"> <li>• No <b>paths</b> to Hemsby or Somerton or Martham</li> <li>• No cycling facilities</li> <li>• Safety for disabled people – lack of pavements</li> <li>• Lack of shops / facilities</li> <li>• Bus service goes all around the villages to get to Great Yarmouth, can we have a bus that goes direct?</li> <li>• Terrible village pub – no emphasis on locals, pubs create community spirit</li> <li>• Church not supported enough, low attendance – it's a 13<sup>th</sup> Century building do we really want to lose it?</li> <li>• Lack of support for lifeboat planning</li> <li>• Insufficient employment in the village to sustain village life</li> <li>• Focus only seems to be on the Beach and Beach Road – no views on centre and rest of village</li> <li>• Lack of visitor engagement in respecting the village and dunes environment</li> <li>• Dog poo on the path</li> </ul>
<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• Increased opportunities for local businesses and possible new businesses</li> <li>• Promoting <b>local businesses</b></li> <li>• Increased employment</li> <li>• Enhance holiday visitor facilities – ie beach and village, toilets, beach huts, fishing facilities, boat launch and houses</li> <li>• Better signage for visitors to use the play area</li> <li>• Toilets that are nice</li> <li>• Dog poo and rubbish picking up signs</li> <li>• Better use of village hall and outbuildings</li> <li>• Develop the outbuildings at the village hall as studios</li> <li>• Engage visitors and residents in learning about what is good and how to be part of its future</li> <li>• Develop a detailed <b>design statement</b> – flint, wood, no PVC</li> <li>• Link up villages with footpaths</li> <li>• Traffic calming, camera or speed bumps</li> <li>• Resident parking areas for those in the centre of the village</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>• Any new builds should have a stipulation not to be holiday lets</li> <li>• Far too many <b>holiday homes</b></li> <li>• Holiday homes &amp; Buy to lets</li> <li>• Growing sense of us vs them – locals vs holiday makers</li> <li>• Concern over new housing becoming second homes, can this be controlled?</li> <li>• Views restricted by additional housing</li> <li>• Speeding by visitors</li> <li>• Vehicle speeds through the village</li> <li>• Speeding, no pavements in some areas, cars appear not to take this into account, tourists complain too</li> <li>• <b>Coastal erosion</b></li> <li>• Sea defences</li> <li>• Car parking on Beach Road spoiling the dunes</li> <li>• What if the car park goes into the sea</li> <li>• Damage to the protected environment – loss of Adders, Bats, ecosystems and the dunes</li> <li>• Pollution due to not enough bins and people unable to throw away poo bags safely</li> <li>• Flood plain on the Craft</li> <li>• Need to get all groups in the village to join in and move forward together</li> </ul>

Key points of discussion and themes from the SWOT have been highlighted in yellow.

Collective Community Planning  
November 2018



## Winterton-on-Sea Issues & Options Consultation Event 26 November 2018



Photo of SWOT Analysis

Collective Community Planning  
November 2018

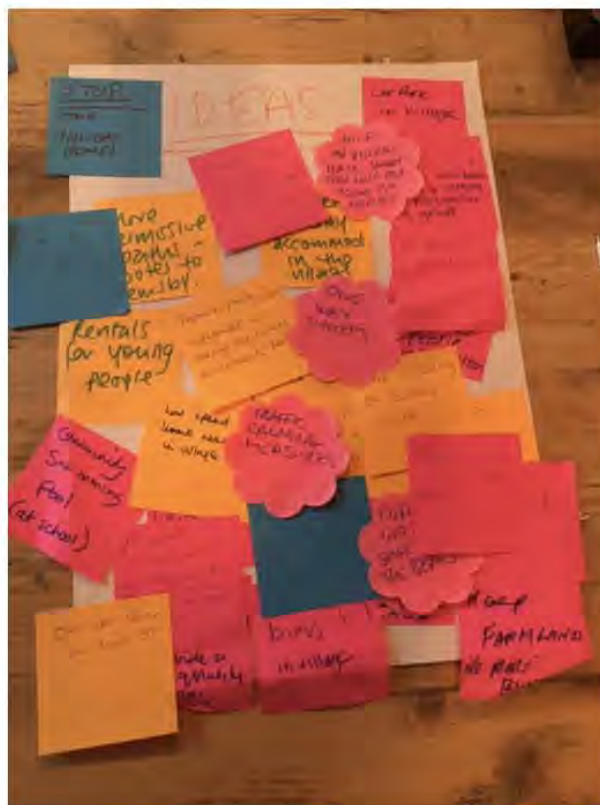


## Winterton-on-Sea Issues & Options Consultation Event 26 November 2018

### Ideas Wall

Event attendees were asked for their ideas of how key issues within the village could be addressed.

- Stop holiday homes
- More use of the village hall
- Wifi in the village hall, smart tech help for young at heart
- Car park in the village
- Bespoke holiday accommodation in the village
- One-way system
- Football field
- New homes only sold to people who have lived and worked in Norfolk for 3 years
- More care homes for older people in Winterton
- More permissive paths to nearby villages
- Rentals for young people open up the sheds for local crafts
- Promote public/visitor engagement in keeping the natural environment healthy
- Lower the speed limit in the village
- Traffic calming measures
- Safe crossing on Bulmer lane
- More wheelchair accessible paths
- Tennis courts on the playing field
- Traffic calming scheme
- Speed bumps
- Youth club
- Coast watch safety on the beach keep farmland, no more building
- Dog poo bins
- More bins in the village
- More use of the church rooms
- A paid village hall coordinator for creating challenging classes for older people
- One way system on King Street
- Community swimming pool at the school



Collective Community Planning  
November 2018



## Appendix D: Legal Advice on Reg 14 Consultation

My colleague, Sam Hubbard, emailed you on 29<sup>th</sup> April 2019 in light of the developing Covid-19 (or Coronavirus) situation and the national advice around social distancing, to explain that the Borough Council would seek independent legal advice on how this may affect public consultation and let you know the outcome of this advice is.

We have now received this advice from a barrister. In summary, the view of the barrister is that to meet the Neighbourhood Plan Regulations (2012) (as amended) the pre-submission documents needed to have been publicly available (a specific location as to where and when these could be viewed), and this could not be achieved during the lockdown period. While the parish council had taken quite reasonable steps to address the availability of documents, the Regulations at the time did not allow for discretion to adopt alternative approaches.

It is noted that there is some unfortunate conflicting advice published by the Government on this matter which states that physical copies of documentation are not needed (paragraph 107 of - <https://www.gov.uk/guidance/neighbourhood-planning>). However, the views of the Council's barrister and of another QC writing in Local Government Lawyer (<https://www.localgovernmentlawyer.co.uk/planning/318-planning-features/43439-plan-making-during-covid-19>) indicate that this view is incorrect.

**The advice therefore recommends that a full six week pre-submission (Regulation 14) consultation is undertaken when documents can be made publicly available for inspection.** It is advisable not to start the consultation (or prescribe an end date) until there is certainty that the documents can be safely accessed by members of the public over the full six week period. Should the lockdown still apply to some individuals, the consultation should clearly set out how documents could still be inspected, such as sending copies of the documents out upon request.

For those comments already received (in the consultation that has already taken place), the parish council could explain that such comments will still be taken into account and that such comments do not need to be re-submitted.

Failure to act upon this advice will present a significant risk that the neighbourhood plan has failed to meet the Regulations and therefore will not progress through examination or could be legally challenged a later date in the process. The Borough Council strongly recommends following the advice because while there will be a relatively short delay, it will provide more confidence that the plan has met the Regulations and reduce the scope for more significant delays later in the process.

We understand that this news will be unwelcome. The Borough Council shares this frustration as it is in a similar situation with its Local Plan Part 2 (Regulation 19) consultation, which may also require a fresh consultation to meet the legislative requirements.

If you have any queries relating to the above, please do not hesitate to contact me.

Yours Sincerely,

Nick Fountain

---

**Nick Fountain**

Senior Strategic Planner

Strategic Planning

Great Yarmouth Borough Council

**Email:** [nick.fountain@great-yarmouth.gov.uk](mailto:nick.fountain@great-yarmouth.gov.uk)

**Website:** [www.great-yarmouth.gov.uk](http://www.great-yarmouth.gov.uk)

**Telephone:** 01493 846626



☆ Nick Fountain

19 May 2020 at 15:28

NF

RE: Winterton Neighbourhood Plan

[Details](#)

To: Louise Cornell, Cc: clerkwinterton@gmail.com



Hi Louise,

Thanks for discussing this with me earlier. Just to confirm the following was discussed –

Please read carefully through the legal advice. The main issue is that while the consultation documents were available in multiple places – these were not available at the same time and in the same places as notified to residents for the full duration of the consultation period (i.e. lockdown may have prevented availability at some locations during the consultation period). This is a specific requirement of the Regulations, and it does not allow for any flexibility.

As discussed below, **failure to act upon this advice will present a significant risk** that the neighbourhood plan has failed to meet the Regulations and therefore will not progress through examination or could be legally challenged a later date in the process. While this is frustrating, consulting again will save time, effort and expense for the plan to proceed to examination. A new consultation will not prohibit the parish council from preparing the documentation for the next stages based on all of the comments received so far; indeed, this may take longer than the consultation period and therefore may not alter timetable for preparation of the plan.

In terms of timing, ideally a further relaxation of lockdown measures, such as opening of public buildings, would be more conducive to consultation. As we had discussed, prior to consultation it would be worth contacting the Borough Council with the arrangements for consultation such as where documents can be inspected for the duration of the consultation and how those members of the public who still cannot leave their house can also view the documentation. We can then provide guidance on this to ensure that consultation meets the Regulations (in light of the Coronavirus situation).

Kind regards,

Nick

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**Nick Fountain**

Senior Strategic Planner

Strategic Planning

Great Yarmouth Borough Council



## Appendix E: Survey Sent to Every Household

### Winterton-On-Sea Neighbourhood Plan

#### Draft Plan Public Consultation

**From 12:00 noon Thursday 19 March 2020**

**To 12:00 noon Saturday 2 May 2020**

The neighbourhood planning process has reached a critical phase, namely “the pre-submission public consultation”. This process has resulted in the production of the current draft of the Winterton-On-Sea Neighbourhood Plan 2020-30 Consultation Document, and associated documents: Evidence Base and Key Issues plus Character Appraisal. These documents are available to view online on the Winterton-On-Sea Parish Council Neighbourhood Plan website:

<http://www.winterton-on-seaparishcouncil.org.uk/community/winterton-on-sea-parish-council-15212/get-involved/> or in hard copy at the Dunes Cafe, Fishermans Return, Loomes, Hermanus, Poppy's and the Chip Shop.

We want to hear your views, so please give us your thoughts and comments on any part of the plan and in particular the policies. It is very important to the process that you (and any other members of your household or community aged 16 years or over) indicate acceptance or otherwise of the Plan. If you wish changes to be made, this is your last opportunity before the Plan is sent for examination.

**The closing date for submissions is 12:00 noon 02/05/20**

Name:	Signature (paper copies):	I confirm I am aged 16 years or over (please tick box) <input type="checkbox"/>
Address:		
Organisation (where appropriate):		

**Please note that without your contact details your views cannot be considered.**

#### **How the information on this form will be used:**

Information given on this form will be used to help prepare the final Winterton-On-Sea Neighbourhood Plan for examination. Please be aware that the forms will be shared with the Parish Council's Planning Consultants and your comments, including personal details, may be made publicly available, for example, if a challenge is made regarding the validity of responses. The Parish Council's privacy notice can be viewed on its website at <http://www.winterton-on-seaparishcouncil.org.uk/community/winterton-on-sea-parish-council-15212/home>

Further copies of this form and a 'Word' version, for those preferring to type their response, can be downloaded from the Winterton-On-Sea Neighbourhood Plan website at <http://www.winterton-on-seaparishcouncil.org.uk/community/winterton-on-sea-parish-council-15212/get-involved/>

Please use this form for your comments and submit your response in one of the following ways:

- Post/Hand deliver to: 'Winterton-On-Sea Neighbourhood Plan' Winterton Village Hall, Kings Street, NR29 4AT.
- Complete the online survey at <https://www.smartsurvey.co.uk/s/Winterton-on-Sea/>



### Section 1. General Comments

<b>I am generally in favour of the Plan</b>  <b>YES/NO</b>	<b>I would like to see changes to the Plan</b>  <b>YES/NO</b>
<b>Comments on the Plan overall:</b>	

Policy No.	Policy Name	Do you agree? Delete as appropriate	Comments, suggestions, changes – please be as clear and concise as possible
<b>Section 2. Housing</b>			
HO1	Settlement Boundary and Residential Development	YES/NO	
HO2	Housing Mix	YES/NO	
HO3	Affordable Housing	YES/NO	
HO4	Design	YES/NO	
HO5	Principal Residence House	YES/NO	
HO6	Tourist Accommodation	YES/NO	

<b>Section 3. Environment</b>			
E1	Protecting and Enhancing the Environment	YES/NO	
E2	High Grade Agricultural Land	YES/NO	
E3	Promoting Winterton-on-Sea's Heritage	YES/NO	



<b>E4</b>	<b>Flooding and Drainage</b>	<b>YES/NO</b>	
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<b>Section 4. Community Assets Policies</b>			
<b>CA1</b>	<b>Winterton-on-Sea Primary School</b>	<b>YES/NO</b>	
<b>CA2</b>	<b>Economic Development</b>	<b>YES/NO</b>	
<b>CA3</b>	<b>Local Green Space</b>	<b>YES/NO</b>	
<b>CA4</b>	<b>Investment in Open Space</b>	<b>YES/NO</b>	

<b>Section 5. Traffic and Environment Policies</b>			
<b>TR1</b>	<b>Public Car Parking</b>	<b>YES/NO</b>	
<b>TR2</b>	<b>Residential Car Parking Standards</b>	<b>YES/NO</b>	
<b>TR3</b>	<b>Walking</b>	<b>YES/NO</b>	

<b>Comments on the 'Housing' section overall:</b>	<b>Comments on the 'Environment' section overall:</b>
<b>Comments on the 'Community' Assets section overall:</b>	<b>Comments on the ' Traffic and Environment' section overall:</b>
<b>Comments on the Plan:</b>	



# **Winterton-On-Sea Draft Neighbourhood Plan Public Consultation**

**We need your input**

**Please complete the village survey  
- forms are located at the Pub,  
Poppy's, Dunes Cafe, Hermanus,  
Loomes and the Chip Shop  
& return it by 2 May 2020  
to the**

**Village Hall (post box)**

**Or by hand at the Consultation  
event in the Village Hall**

**Thursday 2 April 2020 2pm – 6 pm**

**Refreshments available**

**Alternatively complete the online survey @  
<https://www.smartsurvey.co.uk/s/Winterton-on-Sea/>**



## Appendix G: Article included within the Village Newsletter

### **Winterton-On-Sea Draft Neighbourhood Plan Public Consultation**

**We need your input to complete the online survey @**

**<https://www.smartsurvey.co.uk/s/Winterton-on-Sea/>**

**Parishioners are also welcome to attend the  
Consultation afternoon of  
Thursday 2 April 2020 2pm – 6 pm in the  
Village Hall Winterton, Kings Street, NR29 4AT**

**Refreshments available**

**Alternatively send the completed survey to Winterton Village Hall,  
Kings Street, NR29 4AT**

#### **Draft Plan Public Consultation**

**From 12:00 noon Thursday 19 March 2020 To 12:00 noon Saturday 2 May 2020**

**The closing date for submissions is 12:00 noon 02/05/20**

The neighbourhood planning process has reached a critical phase, namely “the pre-submission public consultation”. This process has resulted in the production of the current draft of the Winterton-On-Sea Neighbourhood Plan 2020-30 Consultation Document, and associated documents: Evidence Base and Key Issues plus Character Appraisal.

These documents are available to view online on the Winterton-On-Sea Parish Council Neighbourhood Plan website:

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We want to hear your views, so please give us your thoughts and comments on any part of the plan and in particular the policies. It is very important to the process that you (and any other members of your household or community aged 16 years or over) indicate acceptance or otherwise of the Plan. If you wish changes to be made, this is your last opportunity before the Plan is sent for examination.

Further copies of this form and a 'Word' version, for those preferring to type their response, can be downloaded from the Winterton-On-Sea Neighbourhood Plan website at

<http://www.winterton-on-seaparishcouncil.org.uk/community/winterton-on-sea-parish-council-15212/get-involved/>



## Appendix H: Letter sent to statutory consultees

Dear Stakeholder

### Winterton-on-Sea Neighbourhood Plan Pre-Submission Consultation

Winterton-on-Sea Parish Council are now consulting on their Pre-Submission Draft of the Neighbourhood Plan. This consultation is in line with Regulation 14 of the Neighbourhood Planning Regulations (2012) and will run for a period of just over six weeks from **Thursday 19 March to Saturday 2 May 2020**.

The consultation offers a final opportunity for you to influence Winterton's Neighbourhood Plan before it is submitted to Great Yarmouth Borough Council.

All comments received by 2 May 2020 will be considered by the Neighbourhood Plan Working Group and may be utilised to amend this draft. A Consultation Statement, including a summary of all comments received and how these were considered, will be made available alongside the amended Neighbourhood Plan at a future date.

The full draft Neighbourhood Plan contains policies on the following topics:

- Housing development
- The Natural environment
- Community assets
- Traffic and transport

The Pre-Submission Plan and supporting evidence can all be found online:

<http://www.winterton-on-seaparishcouncil.org.uk/community/winterton-on-sea-parish-council-15212/get-involved/>

Should you wish to provide comments you can send these to the clerk of the Parish Council via email [clerkwinterton@gmail.com](mailto:clerkwinterton@gmail.com) or send them to Parish Clerk, Winterton Village Hall, Kings Street, Winterton-On-Sea, NR29 4AT.

Kind regards

Stacey Kent

Clerk to the Council

Winterton on Sea Parish Council  
Tel: 07918 978921

EMAIL: [clerkwinterton@gmail.com](mailto:clerkwinterton@gmail.com)



# **Winterton-on-Sea Neighbourhood Plan**

## **Evidence Base and Key Issues**

**Summer 2018**

Prepared on behalf of  
Winterton-on-Sea Neighbourhood Plan Steering Group by  
Small Fish  
[www.smallfish.org.uk](http://www.smallfish.org.uk)





# Contents Page

	Page
Summary of key issues	1
Population characteristics	3
Accommodation profile	3
Housing development	6
Affordable housing	7
Deprivation	8
Transport infrastructure and connectivity	10
Acces to services	12
The natural environment	14
Flooding	16
The built environment	17
Appendx 1: Winterton-on-Sea Character Assessment	18



# Summary of Key Issues

Theme	Key Issues
Population characteristics	<ul style="list-style-type: none"> <li>Winterton-on-Sea has a population that's ageing faster than surrounding communities, suggesting that older people are choosing to move into the community and given the slow population growth overall – that younger people are moving out. This could have an impact on the school's viability if continued. It could also be an indication of the right homes not being available to younger people.</li> </ul>
Accommodation profile	<ul style="list-style-type: none"> <li>Around 13% of homes in Winterton-on-Sea are not occupied by residents but used by visitors. This is higher than usual across the borough and nationally and reflects the village being a tourist destination for the Norfolk Coast. It is however a lower proportion than some other nearby communities. Anecdotal evidence indicates that this is increasing. This will limit the opportunities for permanent residents, perhaps younger people in particular, to live in the village. It might also lead to increasingly seasonally driven use of local services.</li> <li>The housing profile is dominated by detached homes, with almost half of homes 3 bedrooms. These will tend to be more expensive and perhaps not affordable for younger people</li> <li>Home ownership is high and in particular the proportion of people who own their homes outright rather than with a mortgage. This might also make it difficult for people with lower incomes, or the younger generation, to stay in the village as there are fewer homes to rent.</li> <li>Winterton-on-Sea has a very low proportion of one-bed homes, only 19, in contrast almost a third of households are single occupancy, suggesting there may be an unmet need for smaller unit housing. Some older people living alone will find it difficult to downsize whilst remaining in the village and so are unable to free up family sized homes for younger families.</li> </ul>
Housing development	<ul style="list-style-type: none"> <li>Winterton-on-Sea has not been identified as a location for new housing growth as part of developing Draft Local Plan Part 2. This means that any residential growth or change in use will come about in an unplanned or ad hoc nature, which could be more difficult to influence.</li> </ul>
Affordable housing	<ul style="list-style-type: none"> <li>There is a desire for people to live in Winterton-on-Sea, with 66 requests for affordable housing made in the last three months. With no affordable housing being built, this need will remain unmet. This might make it more difficult to retain younger people in the village.</li> </ul>



Theme	Key Issues
	<ul style="list-style-type: none"> <li>There is a slight mismatch between provision and demand – with the majority of affordable homes 2 and 3 bed, but requests predominantly being made for 1 bed properties.</li> </ul>
Transport infrastructure and connectivity	<ul style="list-style-type: none"> <li>Parking is constrained within the village centre, which could be exacerbated by new development</li> <li>The PROW network enables greater access to open space, including the dunes, which may place additional pressure on an ecologically sensitive area.</li> </ul>
Access to services	<ul style="list-style-type: none"> <li>There is a range of local services which are valued by residents and visitors, the issue will be about sustaining these</li> <li>Some services are lacking, including a doctors surgery, which may limit larger scale development. The local practice is also under some pressure.</li> <li>The primary school has a recent Ofsted of <i>requires improvement</i> and is facing challenges around sustainability with too few pupils. The Council is currently consulting on a school closure, proposing that children attend Hemsby Primary School instead. This will impact upon those families within the village and could affect the village's attractiveness to future families moving in. It may also result in more people, in particular vulnerable road users, walking between Winterton-on-Sea and Hemsby.</li> </ul>
The natural environment	<ul style="list-style-type: none"> <li>Development could place additional pressure on internationally important sites including the Winterton-Horsey Dunes ecosystem which is already below national targets in relation to its condition</li> <li>The international importance of Winterton-on-Sea from a natural and biodiversity perspective will place significant constraints on development, in terms of where it's located and its sensitivity to natural features. Any increase in development in Winterton-on-Sea will pose a risk to the dunes as it will create more recreational use. It may be necessary to off-set this risk with more accessible but less sensitive open space or access to other open space.</li> </ul>
Flooding	<ul style="list-style-type: none"> <li>Some parts of Winterton-on-Sea are at high risk of flooding from surface water and fluvial to the north of the village. This could be exacerbated through housing development if surface water runoff is not managed appropriately.</li> </ul>



# 1. Population Characteristics

Winterton-on-Sea has a population of 1,295 (estimated figure 2016), a very slight 1% increase in five years since the 2011 Census.

The age profile is older than the district and national averages. Thirty-six percent of residents are aged 65 or over (2016 estimate), an increase of 20% in numbers of older people since the 2011 Census. The average age in 2011 was 50, which compares to 42 and 21% of people aged 65+ in the Borough as a whole.

## Issues

- **Winterton-on-Sea has a population that's ageing faster than surrounding communities, suggesting that older people are choosing to move into the community and given the slow population growth overall – that younger people are moving out. This could have an impact on the school's viability if continued. It could also be an indication of the right homes not being available to younger people.**

# 2. Accommodation Profile

A review of the 2011 Census indicates that Winterton's housing profile is significantly different from the Borough's. Over half of Winterton-on-Sea's dwellings (60%) are detached houses or bungalows and almost a third semi-detached. This compares to 29% detached and 24% semi across Great Yarmouth Borough, which has a higher proportion of terrace properties and flats.

**Figure 1: Accommodation Profile**

Dwelling Type	Winterton-on-Sea	Great Yarmouth Borough
Detached	403 (59.8%)	13,059 (29.4%)
Semi-Detached	183 (27.2%)	10,487 (23.6%)
Terrace	79 (11.7%)	13,610 (30.6%)
Flat or Apartment	9 (1.3%)	6,719 (15.1%)
Caravan / Temporary Structure	0 (0%)	563 (1.3%)
Total	674	44,438

Of the 674 dwellings in Winterton-on-Sea 89 had no usual residents at the time of the Census 2011. These dwellings may be second homes, vacant properties, or used as holiday accommodation. This equates to 13% of houses in the village.

We can use this measure as a broad indicator of the number of holiday lets. When compared with other nearby holiday destinations along the Norfolk Coast, Winterton-on-Sea has a smaller proportion of homes overall that are rented to visitors. It is likely that this proportion has increased since the Census, and certainly this is the feedback from residents.



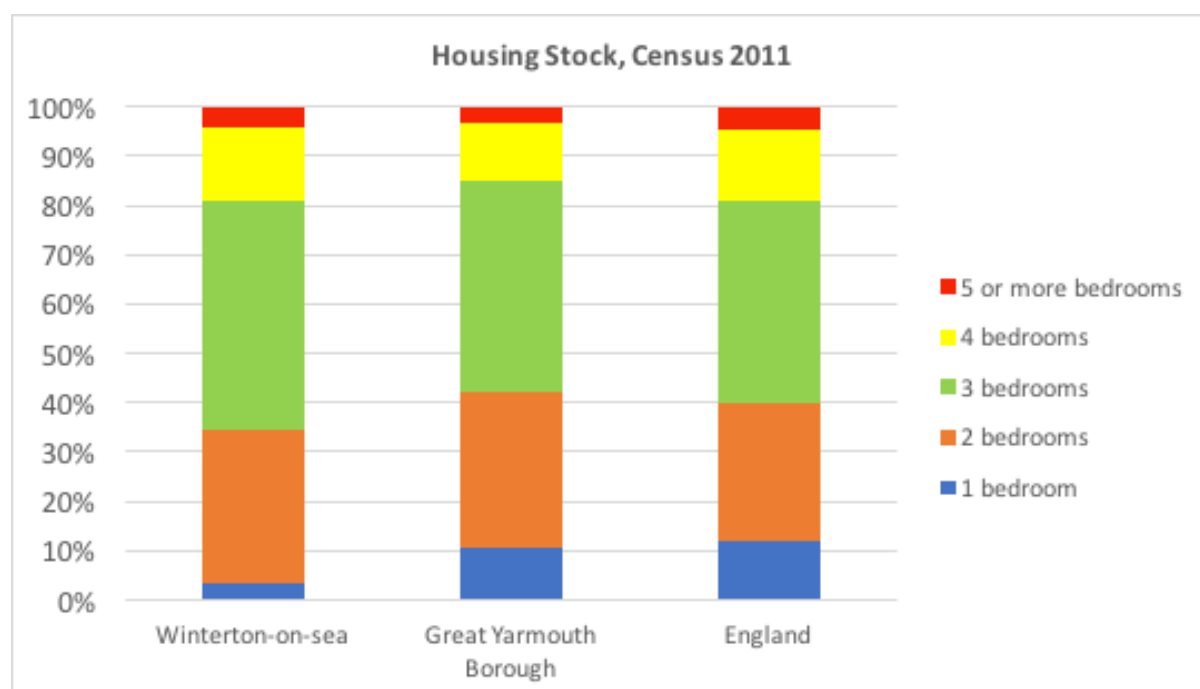
**Figure 2: Households without usual residents**

Community	Household spaces (Census 2011)	Proportion with no usual residents (indicator of holiday lets)
Winterton-on-Sea	674	13%
Happisburgh	1308	17%
Bacton	653	19%
Sea Palling	380	23%
Great Yarmouth		5%
National		4%

Data from the Census on dwelling size, in relation to number of bedrooms, is based on those homes with at least one usual resident. These are predominantly 2 and 3 bedroom homes, almost half (46%) are 3 bed, which is slightly higher than the borough (43%) and nationally (41%).

**Figure 3: Dwelling Size**

Number of bedrooms	Winterton-on-Sea	Great Yarmouth	National
1 Bed	3%	11%	12%
2 Bed	31%	32%	28%
3 Bed	46%	43%	41%
4 Bed	15%	12%	14%
5+ Bed	4%	3%	5%



Of the homes that are occupied by residents, 79.5% are owned, either with a mortgage (24.3%) or outright (55.2%). Home ownership is higher than for the borough (64%) or nationally (63%). The biggest difference is in the proportion of



people who own their homes outright, which is over 20% greater than the Borough. This is perhaps also indicative of the relatively older population.

Overall 17.5% of homes (103) are rented, slightly less than the Borough average of 20.6%. The proportion of socially rented accommodation is low (10.8%) when compared to the Borough (17%) or nationally (18%).

**Figure 4: Housing Tenure**

	Winterton-on-Sea Parish		Great Yarmouth Local Authority	
	count	%	count	%
All households	585	100.0	42,079	100.0
Owned	465	79.5	27,073	64.3
Owned outright	323	55.2	15,024	35.7
Owned with a mortgage or loan	142	24.3	12,049	28.6
Shared ownership (part owned and part rented)	1	0.2	146	0.3
Social rented	63	10.8	7,255	17.2
Rented from council (Local Authority)	60	10.3	5,824	13.8
Other	3	0.5	1,431	3.4
Private rented	40	6.8	6,926	16.5
Private landlord or letting agency	33	5.6	6,280	14.9
Other	7	1.2	646	1.5
Living rent free	16	2.7	679	1.6

In Winterton-on-Sea 30% of households are single occupancy, whereas housing data indicates that there are only 19 one-bed homes. Indeed, the proportion of homes that are one-bedroomed is very low at just 3%.

29% of people aged 16-74 are retired, which is higher than the borough (18.3%) and national (13.7%) averages.

### **Issues**

- **Around 13% of homes in Winterton-on-Sea are not occupied by residents but used by visitors. This is higher than usual across the borough and nationally and reflects the village being a tourist destination for the Norfolk Coast. It is however a lower proportion than some other nearby communities. Anecdotal evidence indicates that this is increasing. This will limit the opportunities for permanent residents, perhaps younger people in particular, to live in the village. It might also lead to increasingly seasonally driven use of local services.**
- **The housing profile is dominated by detached homes, with almost half of homes 3 bedrooms. These will tend to be more expensive and perhaps not affordable for younger people**



- Home ownership is high and in particular the proportion of people who own their homes outright rather than with a mortgage. This might also make it difficult for people with lower incomes, or the younger generation, to stay in the village as there are fewer homes to rent.
- Winterton-on-Sea has a very low proportion of one-bed homes, only 19, in contrast almost a third of households are single occupancy, suggesting there may be an unmet need for smaller unit housing. Some older people living alone will find it difficult to downsize whilst remaining in the village and so are unable to free up family sized homes for younger families.

### 3. Housing Development

Twenty-six new homes, or conversions, have been built in Winterton-on-Sea over the last five years. Unfortunately, we do not have a breakdown by size or type. In terms of tenure, none of these new properties are affordable homes. It is assumed that apart from the 16 homes in 2013/14 all the others have come forward as single dwellings, as infill. It is likely that two of the homes built during 2017/18 are Eco Homes, as observed during the Character Assessment.

**Figure 5: Housing Completions in Winterton**

Year	Number
2017/18*	3
2016/17	1
2015/16	3
2014/15	3
2013/14	16
<b>Total</b>	<b>26</b>

*\* NB this is a provisional figure*

The current local plan document sets out that 30% of new development will be in the primary villages, including Winterton-on-Sea. This was superseded by a paper to the Local Plan Working Party 10 July 2018, which sets out that all additional housing allocations will be accommodated across 5 sites in Gorleston, Belton, Hemsby, Ormesby St. Margaret and Runham. This would deliver a reduction in housing in line with new targets developed from updated national policy guidance.

#### Issues

- **Winterton-on-Sea has not been identified as a location for new housing growth as part of developing Draft Local Plan Part 2. This means that any residential growth or change in use will come about in an unplanned or ad hoc nature, which could be more difficult to influence.**



## 4. Affordable Housing

Affordable housing comprises:

- Affordable housing to rent from a registered provider
- Starter homes
- Discounted market sales housing
- Other affordable routes to home ownership – such as rent to buy

Limited data exists on the demand for affordable housing at a parish level, however the Housing Team at Great Yarmouth Borough Council have provided data from the Allocations Pool as an indication. An applicant can only specify an area they would like to live in for the first three months of being on the waiting list for affordable housing – after this they could be allocated a property anywhere within the borough. Over the last 3 months 66 applications have been made for affordable housing in Winterton-on-Sea, although note that individuals could select more than one village. There are 181 applicants on the housing list currently – but this is more of an indication of demand across the borough rather than in Winterton-on-Sea.

The village has 68 affordable homes provided by the council, plus two Housing Association properties. It is assumed that these are currently occupied, given there are people on the waiting list. The figures for the last 3 months also indicate that there is greatest need for 1 bedroom properties, so there is also a slight mis-match between current supply and demand.

**Figure 7: Affordable housing units provided by the Council**

Property	Number
1-bedroom	10
2-bedroom	30
3-bedroom	24
4-bedroom	4
<b>Total</b>	<b>68</b>

Of the 26 new homes built over the last five years there has been no additional provision for affordable housing. The Borough Council's Local Plan sets out that should any housing development of more than 10 units come forward (except in Areas of Outstanding Natural Beauty when the threshold is 5 – classed as designated rural areas and includes national parks too), the Council will seek 20% of units to be affordable.



**Figure 6: Affordable housing requests**

<b>Number of Bedrooms</b>	<b>Request within last 3 months</b>	<b>Request over 3 months ago</b>	<b>Total requests</b>
<b>1</b>	34	24	58
<b>2</b>	20	14	34
<b>3</b>	8	22	30
<b>4</b>	4	44	48
<b>5</b>		9	9
<b>6</b>		1	1
<b>7</b>		1	1
<b>Total</b>	<b>66</b>	<b>110</b>	<b>181</b>

#### **Issues**

- There is a desire for people to live in Winterton-on-Sea, with 66 requests for affordable housing made in the last three months. With no affordable housing being built, this need will remain unmet. This might make it more difficult to retain younger people in the village.
- There is a slight mismatch between provision and demand – with the majority of affordable homes 2 and 3 bed, but requests predominantly being made for 1 bed properties.

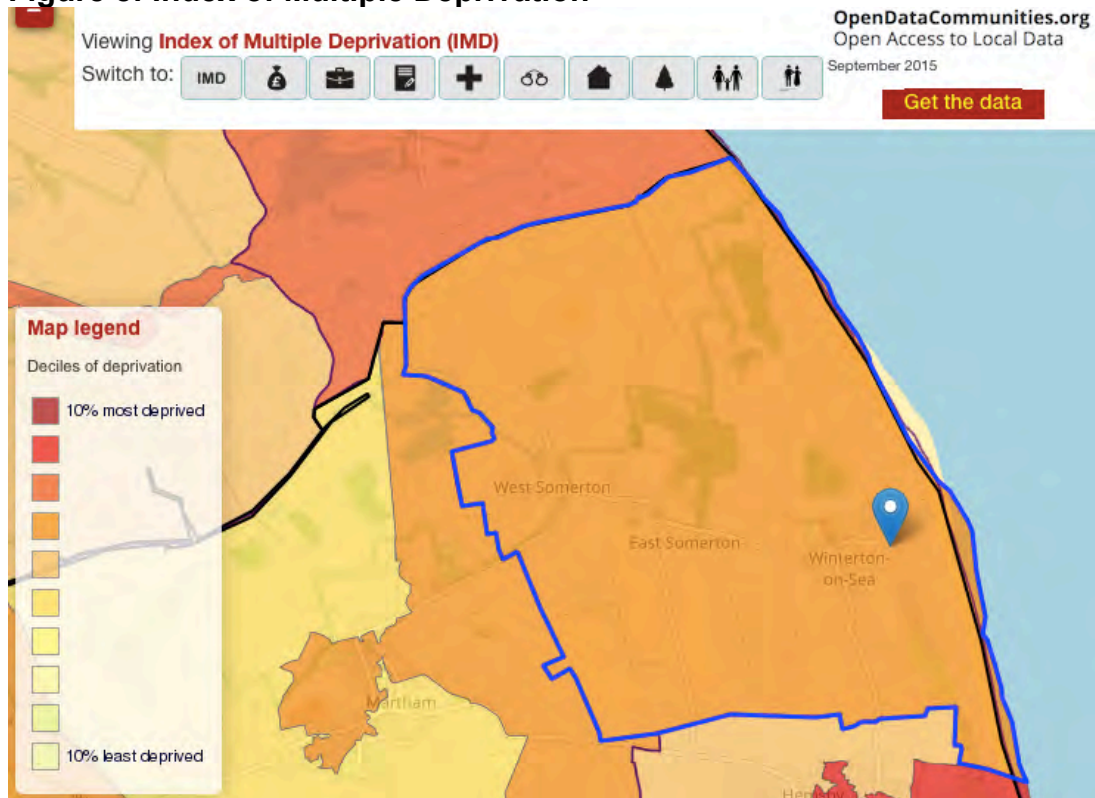
## **5. Deprivation**

The Index of Multiple Deprivation is a measure of relative deprivation across England and an aggregate of a number of indicators, 37 in total across 7 domains. Geographically this is based on Super Output Areas, which do not correspond with Parish boundaries, Winterton-on-Sea falls into an area with East and West Somerton, so any evidence here relates to all three villages.

The figure below shows that Winterton-on-Sea falls into the 40% most deprived neighbourhoods in England – so fairly average. In general deprivation is therefore not likely to be an issue for the Neighbourhood Plan, although it might be the case that some households are deprived.



**Figure 8: Index of Multiple Deprivation**



The parish falls into the 20% least deprived areas nationally for crime. As a snapshot, there were three reported crimes in January 2018, one in February in March 2018, see map below of the locations of crime in March. Crime is therefore not an issue.

**Figure 9: Reported Crime, March 2018**





## 6. Transport Infrastructure and Connectivity

The main road connecting villages along the coast, Bulmer Lane / Hemsby Road, runs along the western edge of the village's built up area. Black Street, the main road through the village, links the church near the top of the settlement, the primary school and village centre, turning into Beach Lane which connects the beach. The road narrows significantly as you travel towards the centre. Other residential roads and estates within the settlement connect out from either Bulmer Lane or Black Street.

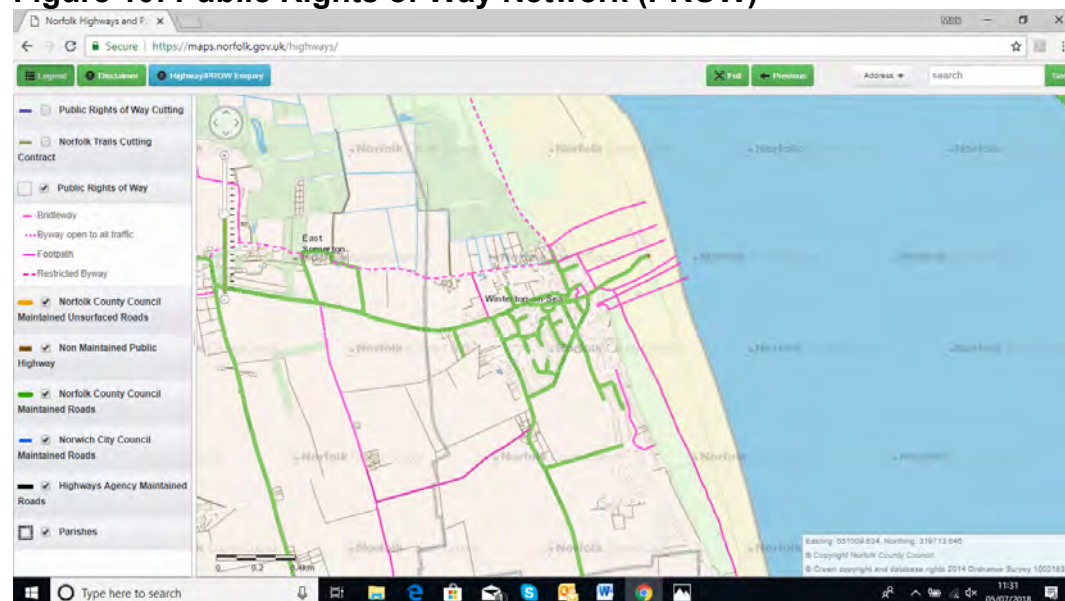
Within the village the roads are quiet in terms of traffic. Those within the village centre are narrow and there is poor visibility at some junctions. This encourages low traffic speeds. Faster speeds can be observed along the main roads – and speeding is a concern to residents along Black Street and The Craft. The settlement predominantly has a 30mph limit, with 20mph advisory outside the primary school.

Parking is constrained within the village centre. Some homes do not have designated parking and additional pressure is placed on common parking areas by high numbers of day visitors to the beach during the summer months.

The village is well connected by public transport to Great Yarmouth, with an hourly bus service, which also goes on to the James Page Hospital. There's a direct bus service once a week to Norwich.

Footways are limited in the village centre which is characterised by narrow streets. There are footways along the main roads, though not always on both sides of the road. There are no dedicated cycle paths. The parish is however quite well served by Public Rights of Way providing access to open natural spaces, such as surrounding countryside, beach and dunes.

**Figure 10: Public Rights of Way Network (PROW)**





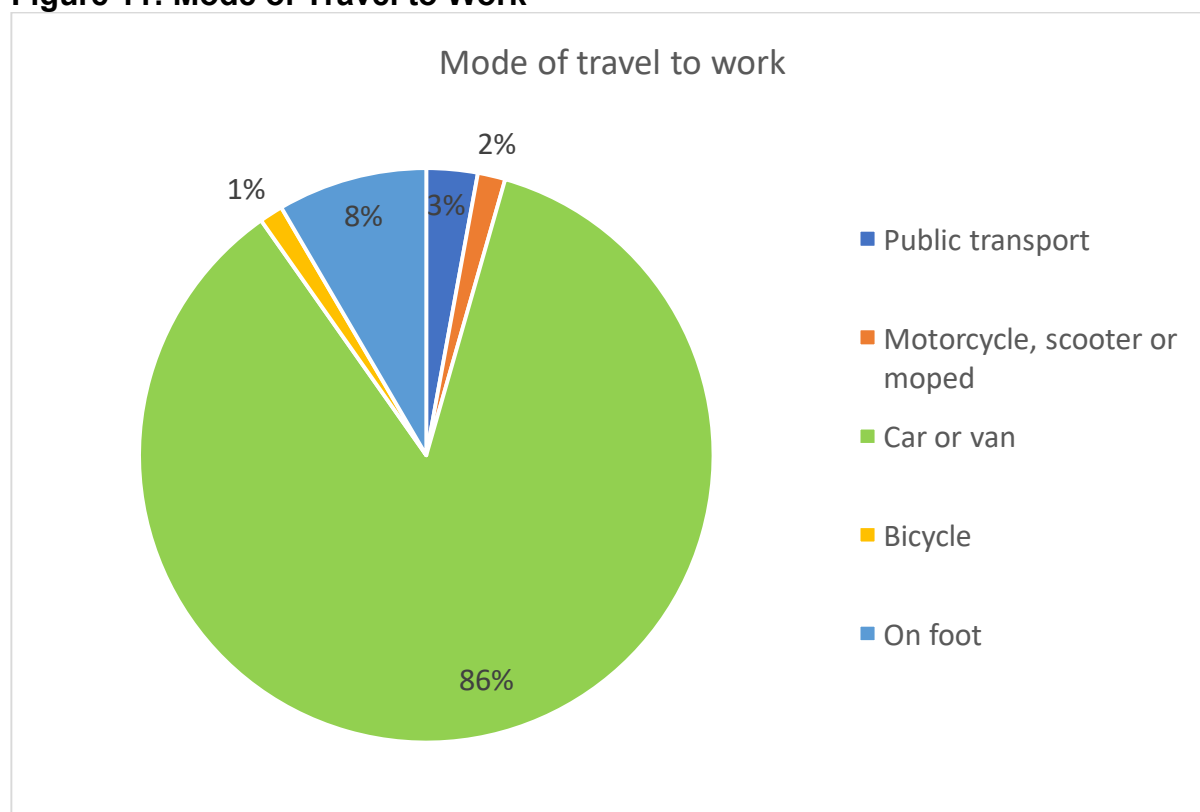
## Issues

- **Parking is constrained within the village centre, which could be exacerbated by new development**
- **The PROW network enables greater access to open space, including the dunes, which may place additional pressure on an ecologically sensitive area.**

## 7. Travel to Work

The average distance travelled to work is 20.4km, which is higher than the borough average of 16.8km. 9% of people travel less than 2km to work, so likely work within the local community, also 13% of people stated that they work mainly at or from home, which is fairly high. This compares with the national and borough averages of 10% and 9% of people working from home. Adding these two figures together, you could assert that almost a quarter of people who live in the village (who are of working age and in employment) also work there.


**Figure 11: Mode of Travel to Work**



For those people aged 16-74 who are in employment (and don't work from home), 86% travel to work by car or van, either as the driver or passenger.



**Figure 12: Car Ownership**

<u>Cars</u>	<u>Winterton-on-Sea</u>	<u>Great Yarmouth</u>
		
All categories: Car or van availability	100.0	100.0
No cars or vans in household	16.2	27.2
1 car or van in household	45.8	44.8
2 cars or vans in household	27.5	21.2
3 cars or vans in household	6.3	5.0
4 or more cars or vans in household	4.1	1.8

A relatively low proportion of households have no car, but this still means that around 1 in 6 households will be very dependent on local services and public transport.

### **Issues**

- **A high proportion of people live and work in Winterton-on-sea, which means they're more likely to make use of local services – along with visitors to the community.**
- **One in 6 households have no car and so rely heavily on local service provision and its retention such as the shop**
- **The car remains the dominant mode of choice for those travelling to work, which indicates that public transport is not flexible or good enough for most commuters**

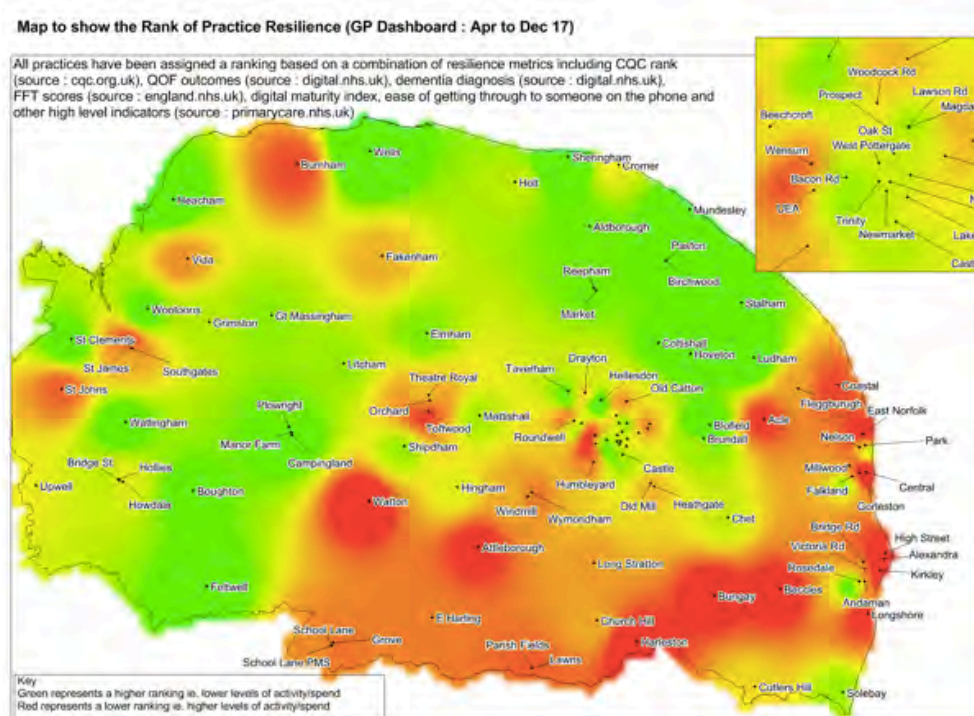
## **8. Access to Services**

Winterton-on-Sea has a range of village amenities including a Shop, Post Office, Chip Shop, Village Hall, Pub, Primary and Nursery School and Church.

The closest doctors surgery is Hemsby Medical Centre, around 1.5 miles away, part of the Coastal Partnership. The surgery is accessible by bus. There is some feeling from residents that Winterton-on-Sea should have its own doctors surgery. Mapping undertaken for the Norfolk and Waveney Sustainability and Transformation Plan indicates that the Coastal Partnership practice ranks low on the resilience scale when compared to other practices across the footprint. This suggests the practice is under some pressure and has high levels of activity. The practice ranks yellow for performance – in relation to overall spend, A&E attendances, non-elective emissions.



**Figure 13: GP Practice Resilience**



Winterton-on-Sea has a Primary and Nursery School, with 74 pupils, currently rated *Requires Improvement* by Ofsted. The school mainly draws children from the village, with a few children from nearby East/West Somerton. Numbers on the roll are low, and reducing with 17 children leaving year six in July and 15 currently reported to start in September. Norfolk County Council is currently consulting on proposals to close the school due to sustainability and leadership issues – and include Winterton-on-Sea within the Hemsby Primary school catchment. It's 1.8 miles from the village to Hemsby Primary and the council is proposing initially to transport affected children from one to the other.

**Figure 14: Number on roll January 2018**

Year	Number on Roll
Nursery	10
Reception	8
Year 1	7
Year 2	10
Year 3	7
Year 4	8
Year 5	7
Year 6	17
<b>Total</b>	<b>74</b>

### Issues

- There is a range of local services which are valued by residents and visitors, the issue will be about sustaining these
- Some services are lacking, including a doctors surgery, which may limit larger scale development. The local practice is also under some pressure.



- The primary school has a recent Ofsted of *requires improvement* and is facing challenges around sustainability with too few pupils. The Council is currently consulting on a school closure, proposing that children attend Hemsby Primary School instead. This will impact upon those families within the village and could affect the village's attractiveness to future families moving in. It may also result in more people, in particular vulnerable road users, walking between Winterton-on-Sea and Hemsby.

## 9. The Natural Environment

The Neighbourhood Plan area, which stretches up along the dunes to Horsey and down to Hemsby, includes a number of sites designated for their natural beauty or importance. This includes:

- Norfolk Coast Area of Outstanding Natural Beauty, encompassing the coastline from the Wash in the west through costal marshes and cliffs to the dunes at Winterton-on-Sea
- Winterton Horsey dunes SSSI
- Winterton Horsey dunes SAC
- Winterton Ness dunes National Nature Reserve

There are also a number of County Wildlife Sites located to the north of the village settlement.

The Winterton-Horsey Dunes SSSI is unusual as it shows greater ecological similarities to the dune system of the West Coast, supporting acidic plant communities, than the geographically closer dunes within the North Norfolk Coast SSSI. The site supports well developed areas of dune heath, slacks and dune grassland verging into grazing marsh and birch woodland. The Great Yarmouth Annual Monitoring Report looks at the condition of SSSIs – the most recent (2016/17) reporting that just 67.92% of Winterton Horsey Dunes is in favourable condition – there's a national target of 95% so this is below.



**Figure 15: Extract on from Great Yarmouth Annual Monitoring Report:  
Condition of SSSIs**

**Figure 10 Sites of Special Scientific Interest (SSSI) 2016/17**

SSSI Sites	% Area Favourable Condition	% Area Unfavourable Recovering Condition	% Area Unfavourable No Change	% Area Unfavourable Declining	% Area Destroyed/ Part Destroyed
Hall Farm Fen, Hemsby	100.00%	0.00%	0.00%	0.00%	0.00%
Great Yarmouth, North Denes	100.00%	0.00%	0.00%	0.00%	0.00%
Winterton-Horsey Dunes (part)	67.92%	9.88%	22.2%	0.00%	0.00%

The Great Yarmouth Landscape and Character Assessment 2008 provides an overview of the Winterton Dunes and Coastal Strip down to California. Key points include:

- Dunes and associated grasslands create a wild and unspoiled character to the coastal landscape, acting as a valuable buffer between the sea/beach and settlement edge as well as supporting a range of habitats
- The sandy beach and dunelands evoke a strong sense of tranquility and peacefulness outside of peak summer season
- Dunes at Winterton form a key natural flood defense and are considerably more stable than other parts of the North Sea coastline
- The Winterton-Horsey Dunes are designated SSSI, SAC and SPA for their habitat value in relation to bird nesting and breeding as well as diverse flora
- A strong sense of place is created by the presence of terns and waders, and associated noise, along the shoreline, as is the presence of seals off the beach

### **Issues**

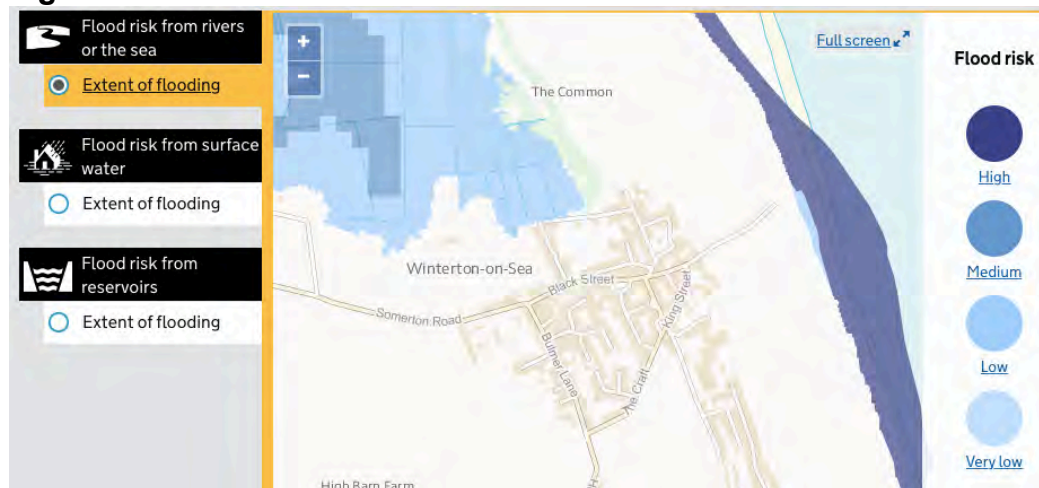
- **Development could place additional pressure on internationally important sites including the Winterton-Horsey Dunes ecosystem which is already below national targets in relation to its condition**
- **The international importance of Winterton-on-Sea from a natural and biodiversity perspective will place significant constraints on development, in terms of where it's located and its sensitivity to natural features. Any increase in development in Winterton-on-Sea will pose a risk to the dunes as it will create more recreational use. It may be necessary to off-set this risk with more accessible but less sensitive open space or access to other open space.**



# 10. Flooding

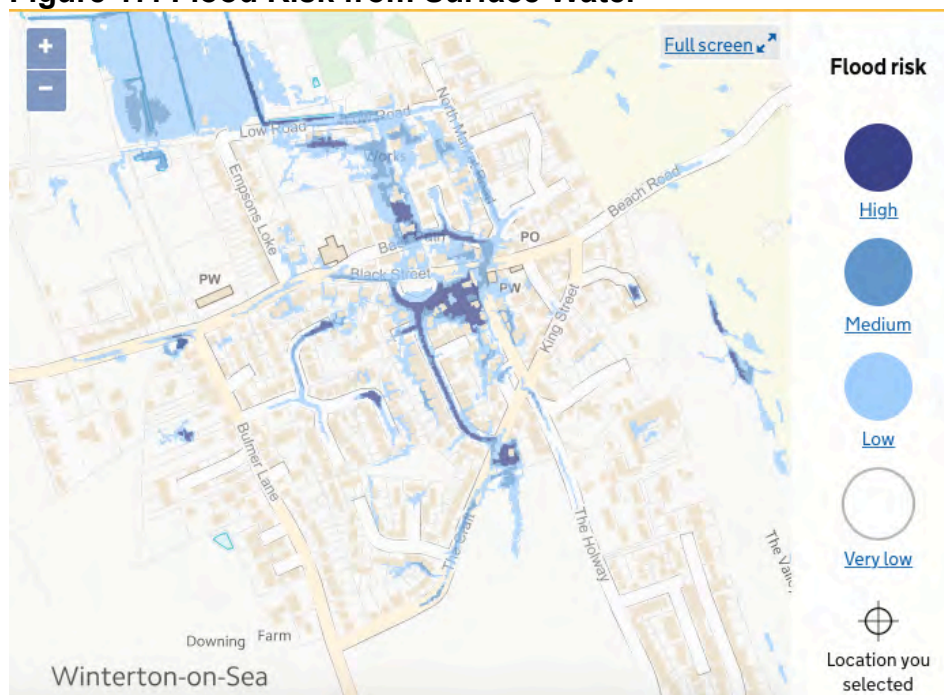
The Environment Agency provides an indication of the long-term risk of flooding based on rivers, sea, surface water and groundwater. The maps below indicate that there is very low to no risk of flooding from rivers or the sea, though it does prevent development encroaching to the north, but there are issues in relation to flood risk from surface water throughout the village.

**Figure 16: Flood risk from Rivers or the Sea**



Flood risk from surface water affects many parts of the village, including the centre, with a high risk area concentrated Black Street and The Lane. High risk means that each year this area has a chance of flooding of greater than 3.3%. Flooding from surface water is difficult to predict as rainfall location and volume can be difficult to forecast.

**Figure 17: Flood Risk from Surface Water**



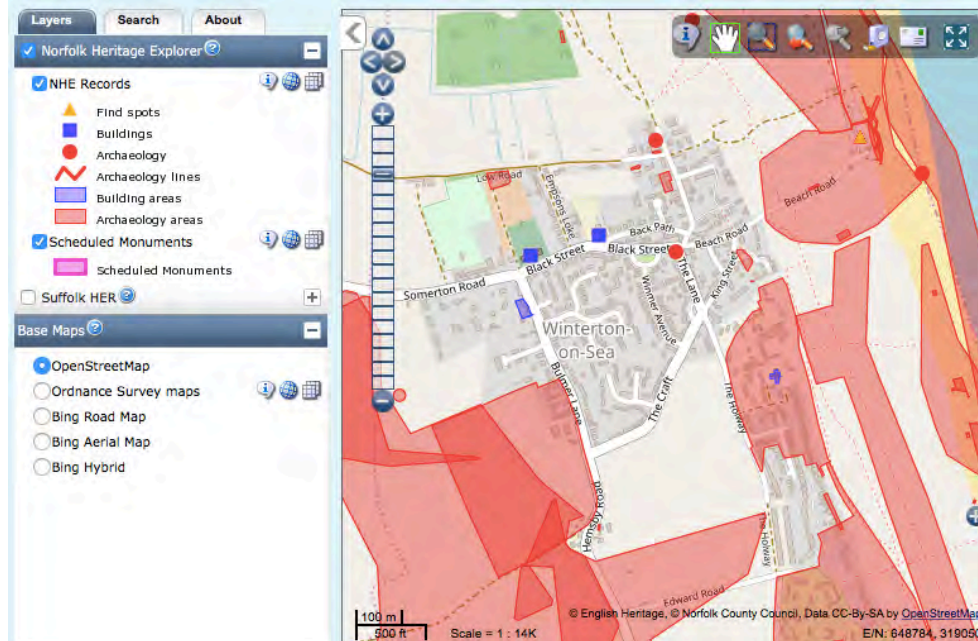


## Issues

- Some parts of Winterton-on-Sea are at high risk of flooding from surface water and fluvial to the north of the village. This could be exacerbated through housing development if surface water runoff is not managed appropriately.

# 11. The Built Environment

Figure 18: Historical Features



The Church and the Monument are both Grade II; there are no other listed buildings in the village. There are also extensive areas of archaeological interest around the village, except to the north, which means there is evidence of past human activity that may be of interest to investigate at some point.



# Appendix 1: Winterton-on-Sea Character Assessment

## Summary

Winterton has a gently sloping topography towards the sea and a general nucleated layout, bounded by fields and by coast, with newer development emanating out from the village centre. The older village centre is denser with narrow and very quiet lanes, limited off street parking and limited footways, and with the houses being very diverse in terms of styles, heights and materials. This diversity and randomness is a key feature of the historic character. There is evidence of newer development reflecting some of the more historic character, but more commonly the newer development is more generic, less dense and with a more open streetscene, with functional advantages such as footways and off-street parking. The nucleated layout limits views and openness, although there are important views of key landmarks such as the church and the lighthouse. Apart from the community services and facilities such as the church, village hall, pub and shops, the overall use is residential in the village with surrounding farmland, although its location has resulted in many houses being holiday lets.

## Land Uses

- Mainly residential in the village, surrounded by open farmland or coastline, including dunes, to the east - although views of the coast from the village are more limited
- The village is an important tourist destination, with holiday lets apparent particularly in the village centre, including a holiday complex 'Hermanus'
- There are community facilities such as village hall, church, pub, school, playground, post office, convenience shop and fish and chip shop.

## Layout

Winterton has a nucleated settlement pattern that clusters out to the West from the village centre which is closest to the beach. Historically it was a fishing village and the village centre retains characteristics of such with buildings grouped closely together along narrow streets without car parking. The settlement is quite dense in places, especially nearer the village centre.

There are a few green spaces, including the village green, but also at the junction of King Street/ The Craft and The Holway in the centre - which does make it feel more open despite a high density of buildings. The settlement becomes more open as you travel away from the centre with residential density lower, verges and some footways such as along the main road. There are no footways in the village centre. The children's playing field is more enclosed, accessible through walkways, where there is 'new estate' feel and design to the layout.



Winterton has a range of village amenities including a Shop, Post Office, Chip Shop, Village Hall, Pub, Primary and Nursery School and Church. There is a bus shelter on the Village Green with hourly bus services to neighbouring settlements along the coast, including Great Yarmouth, and beyond.

The village layout is not uniform, especially in the centre, but it becomes more so as it spreads out. In the centre, the non-uniform layout appears to be a key aspect of the character.

### **Roads, Streets & Routes**

The main road connecting villages along the coast Bulmer Lane/Hemsby Road runs along the western edge of the village's built up area. Black Street, the main road through the village, links the church near the top of the settlement, the primary school and village centre, turning into Beach Road which connects the beach. Black Street narrows significantly as you travel towards the centre. Other residential roads and estates within the settlement connect out from either Bulmer Lane or Black Street.

Within the village the roads are quiet in terms of traffic. Those within the village centre are narrow and there is poor visibility at some junctions. This encourages low traffic speeds. Faster speeds can be observed along the main roads – and speeding is a concern to residents along Black Street and The Craft. The settlement predominantly has a 30mph limit, with 20mph advisory outside the primary school.

Parking is constrained within the village centre where there is a higher density of homes and some without private parking. This includes a row of houses down The Loke, with residents relying on communal parking on street or outside the village hall. Additional pressure is placed on parking availability with Winterton-on-Sea being a visitor destination. As a result parked cars are a significant part of the streetscape within the settlement, particularly in the village centre.

The more modern estate development has off-street parking and footways. Although functionally welcome, these features change the character and feel of these areas.

Bulmer Lane / Hemsby Road is the only one to have a dashed centre line. This has a footway on just one side.

There are no dedicated cycle paths.

### **Topography**

The settlement has a slight natural sloping gradient down towards the sea. The land put forward for new development as part of the Local Plan has a more significant gradient that could result in drainage management issues.

Because of the clustered nature of the village it is not generally an open aspect apart from at the village edges.

### **Streetscape**



The streets are narrow in the village centre, with buildings directly fronting the road, some without front gardens and no verges. Here the street scene is dominated by houses – rather than the road which is the case in the more recently developed areas. As you move away from the centre properties become more set back, and in residential estates properties have front gardens, driveway and garages in the main.

Bulmer Lane is dominated by the highway – which has a centre line and footway on the east side. There are some railings and street furniture fronting properties here also. Railings are not evident elsewhere in the village.

There is street lighting along the main roads, the side roads are not always lit.

Green open spaces are attractive and well cared for. There are some trees and hedging, but the settlement is not dominated by vegetation.

### **Building features**

The settlement is extremely mixed. The village centre has smaller, older, denser and more individualistic housing that is built close to the road. Some social housing is evident. There is estate housing off the village green. There are some more recent eco-housing and the village has lots of holiday lets, some purpose built.

Properties are predominantly detached, but there are also some semi-detached and terraced dwellings. They are mostly two storey and single storey, but some are one and a half with dormer windows, and even some two and a half storey, though these tend to be the exception.

Most properties have red pantile roofs, but there is also thatch and some grey slate. Thatched roofs are a particular feature in the village centre. This includes round thatched buildings as part of the Hermanus holiday park (originally designed to emulate South African round huts), a row of thatched cottages along The Lane that were built during the 1950s/60s, as well as more historic thatched buildings dotted around the centre.

Properties are mostly red brick, but some are timber clad and some use flint in the village centre. This includes the Fisherman's Return pub, dating back 400 years, which has a flint wall to one aspect.

There is a small pocket of red brick new-builds sandwiched in to the east of the village centre, accessed down a narrow lane by the Village Hall. This style of estate and design of buildings is considered to be out of character with the rest of the village.

Along the main road through the village, Black Street, homes are more set back and there are some larger Victorian style properties.

As you move away from the village centre there are several estate developments – dating back to the 1960s/70s and perhaps later. This includes an estate of 2-bed bungalows off Bulmer Lane, as well as more mixed provision of bungalows and



detached houses running off from the village green. The character and feel of these estates is very different from the rest of the village settlement. The homes have garages, front gardens with walls to the front. Here properties and styles are more generic when compared to those in the centre.

## **Views**

Views are limited within the village because of the non-linear, nucleated pattern.

There are views of the church from several streets, such as Black Street and Bulmer Lane, and views are evident toward the dunes from along Black Street

Homes that run along the edges of the village have views over fields – with some homes built during the 1990s along The Craft known in relation to their field views. These same homes also have views of the former Lighthouse, now an upmarket holiday let. Views for these homes will be affected should development come forward in the location proposed.

## **Landmarks**

Key landmarks in the village include:

- The Church
- Village green, with new artistic sign
- The Fisherman's Return – the pub in the village centre
- Hermanus the holiday village, with its distinct style of round building with thatch roofs
- The lighthouse, now holiday let



# Winterton-on-Sea Neighbourhood Plan

## STATEMENT OF BASIC CONDITIONS





## Section 1: Introduction

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1. This Basic Conditions Statement has been prepared by [Collective Community Planning](#) on behalf of Winterton-on-Sea Parish Council to accompany the Winterton-on-Sea Neighbourhood Plan 2020-35 (WoSNP).
2. The purpose of the statement is to demonstrate that WoSNP meets the legal requirements for a Neighbourhood Plan and the five basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, as applied to Neighbourhood Development Plans by Section 38A of the Planning and Compulsory Purchase Act 2004.
3. The five basic conditions are:
  - a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan;
  - b) The making of the neighbourhood development plan contributes to the achievement of sustainable development;
  - c) The making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
  - d) The making of the neighbourhood development plan does not breach, and is otherwise compatible with EU obligations; and
  - e) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the plan.
4. There is one prescribed basic condition for Neighbourhood Development Plans, in relation to e) above, that *“the making of the neighbourhood development plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007), either alone or in combination with other plans or projects”*.
5. This statement confirms that:
  - The legal compliance requirements have been met (section 2);
  - WoSNP has had due regard to national policies and advice contained in guidance issued by the Secretary of State (Section 3);
  - WoSNP contributes towards sustainable development (Section 4);
  - WoSNP is in general conformity with the strategic policies contained in the Great Yarmouth Borough Council (GYBC) and Broads Authority (BA) Local Plans (Section 5);
  - WoSNP does not breach and is otherwise compatible with EU obligations, and that its making is not likely to have a significant effect on the environment, either alone or in combination with other plans or projects (Section 6); and
  - WoSNP meets the prescribed conditions for Neighbourhood Development Plans (Section 7).



6. In December 2020 the GYBC and the BA undertook a Health Check on WoSNP to determine whether it met the basic conditions. The comments provided and actions taken are listed in **Appendix A**.



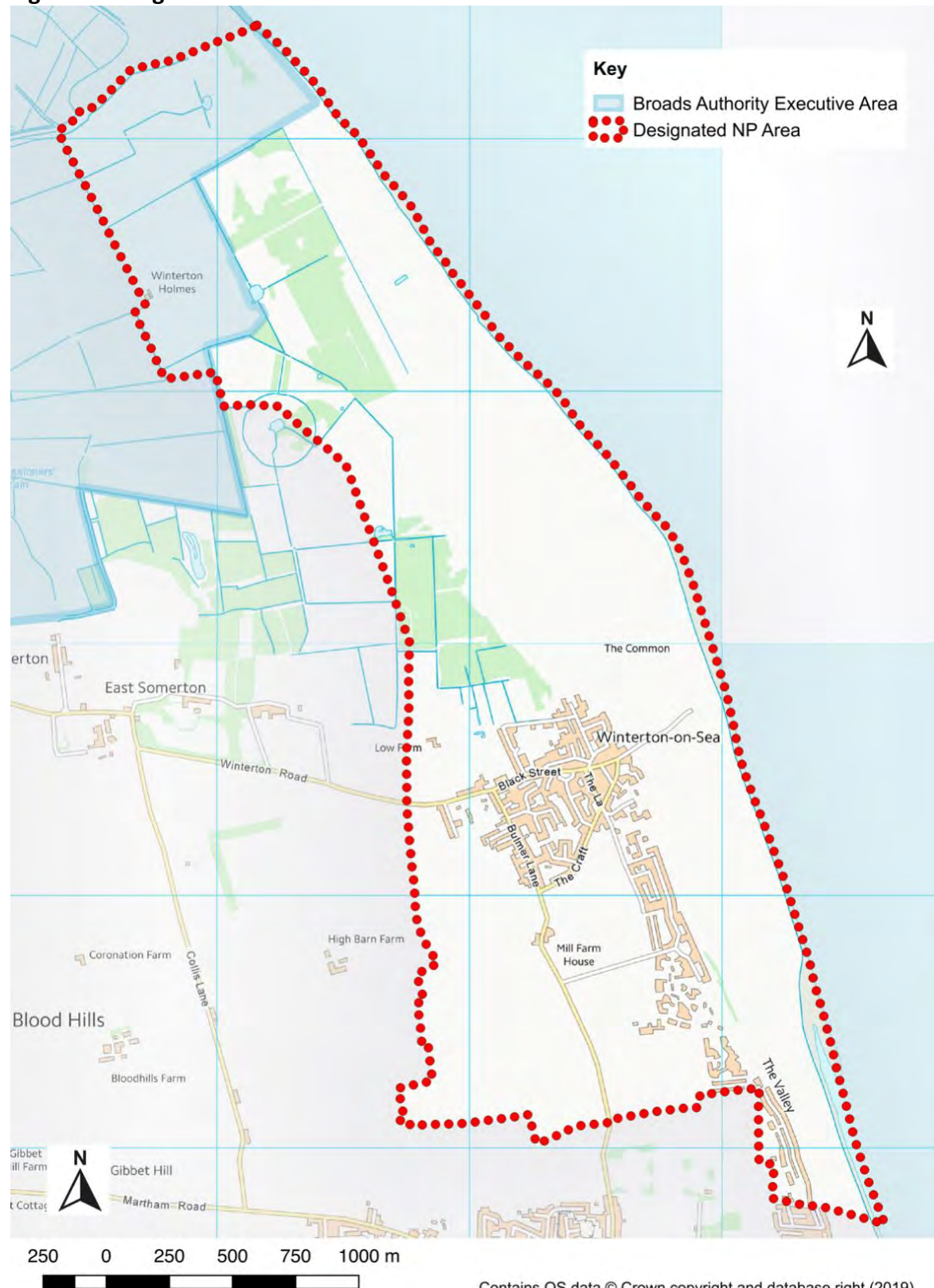
## Section 2: Legal and Regulatory Compliance

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7. The WoSNP has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (as amended). The plan also has regard to policies within the National Planning Policy Framework (NPPF) and guidance from the National Planning Practice Guidance (NPPG). The NPPG largely reflects the Regulations, providing further guidance as to how such requirements can be met.
8. WoSNP relates to the whole parish area that was designated by GYBC and the BA as a Neighbourhood Area in August 2017. The Neighbourhood Plan relates only to this area, which is contiguous with the parish boundary. No other Neighbourhood Development Plan has or is being made for this area. WoSNP has been prepared by Winterton-on-Sea Parish Council who are the qualifying body.
9. WoSNP includes a map of the designated area, see **Figure 1** of this report.
10. WoSNP sets out policies in relation to development and the use of land in the designated neighbourhood area and which has been prepared in accordance with the statutory provisions. Initial consultations had due regard to guidance whilst Regulation 14 (Pre-Submission) consultation was consistent with the specific regulatory requirements, as detailed in the Consultation Statement. In relation to this, the draft Neighbourhood Plan and its supporting documents were published on the Winterton-on-Sea Parish Council website, advertised in the local newsletter and a survey was sent to every resident in the neighbourhood area. Hard copies were available in key public places around the village. Comments were invited online, via email or in writing. A copy was also sent to statutory consultees, some of whom responded.
11. WoSNP covers the period 2020-30 which is in general conformity with the differing timeframes for the strategic policies in the current Local Plans for GYBC (2013-30) and the BA (2015-36).
12. WoSNP does not include provision about development that is excluded development, such as minerals and waste matters, nationally significant infrastructure projects or other prescribed development under Section 61K of the Town and Country Planning Act 1990.



**Figure 1: Designated Area**





## Section 3: Due Regard to the NPPF

13. National planning policy is set out in the National Planning Policy Framework (NPPF). The most recent version was published in February 2019. WoSNP has been prepared with the policies and guidance contained within the NPPF at its core. The NPPF sets out more specific guidance on Neighbourhood Plans at Paragraphs 28 to 30, but there is relevant policy throughout other parts of the NPPF.
14. **Figure 2** demonstrates how WoSNP has had regard to national policy by cross referencing its policies against national policy and guidance. It should be noted that the table is not exhaustive and there may be other cross-references that are not included.

**Figure 2: National Planning Policy Framework**

WOSNP Policy	NPPF Cross References	Comments
General	Para 8, para 13, para 15, para 16, para 28 and 29, para 31, para 34, Section 12.	<p>WoSNP will help to deliver sustainable growth that meets the economic, social and environmental objectives. It provides a suite of policies that will shape and direct development outside of the current strategic policies set out in the prevailing Local Plans. It supports these strategic policies as shown in <b>Figure 3</b>.</p> <p>WoSNP provides a framework for addressing housing needs and other economic, social and environmental priorities, and has been a platform for local people to shape their surroundings. It has been prepared positively and has engaged the community and other consultees, as set out in the Consultation Statement.</p> <p>WoSNP includes non-strategic policies for infrastructure and community facilities, design principles, conserving and enhancing the natural environment and other development management matters such as residential car parking.</p> <p>It is supported by a robust but proportionate evidence base. This is available in a separate document. Key aspects of this are presented in the supporting text of the policies.</p>



WOSNP Policy	NPPF Cross References	Comments
		Some of the policies encompass design, with the emphasis on achieving a rural feel. Policy HO4 is the main policy, but others include E3 and TR2.
HO1: Open market Housing outside the Development Limits	Para 8, 11	This policy seeks to provide clear guidance to developers in circumstances where NPPF para 11d applies and limited weight can be given to the development plan. WoSNP is supportive of applications outside of development limits where it meets a set of criteria: being adjacent to the development limits; not significantly encroaching into the countryside; is proportionate to the size of the village; allows sustainable access to services and facilities; and is consistent with other policies in the development plan.
HO2: Housing mix	Para 8, 11 and 61	This policy will help ensure future development meets the needs of the community including the provision of smaller homes to meet younger people looking to get on the housing ladder, and older people looking to downsize.
HO3: Affordable housing	Para 8, 11, 77, 78,	This policy is supportive of small rural exception and entry level housing to meet local need. The policy seeks to ensure that affordable housing is well located with respect to the rest of the village and its services.
HO4: Design	Para 102, Para 122, Section 12, para 148	This policy requires high quality design, with new development in keeping with that of the village, in particular blending with its historic nature. Contemporary and innovative design is encouraged. The policy requires an appropriate density. Applications will need to demonstrate sustainable access to local services. There is a requirement for electric vehicle charging points.
HO5: Principal Residence Housing	Para 8, 29, 91	This policy intends to support a strong, vibrant and healthy community by restricting the growth of second homes within the community, which are already high and have been demonstrated to have a significant impact upon the resident population. This is a central part of the vision for WoSNP, which aims to balance the needs of residents and visitors.



WOSNP Policy	NPPF Cross References	Comments
HO6: Tourist Accommodation	Section 6	This policy supports growth in the tourism sector in WoS, already a key strength of the community. It allows for development outside of the development limits where well related to the settlement or involves the conversion of existing buildings.
E1: Protecting and enhancing the environment	Para 8, Section 15	This policy protects and enhances the natural environment and requires biodiversity improvement as part of all development.
E2: High Grade Agricultural Land	Section 15, para 170	The policy looks to limit major development on productive agricultural land, specifically that identified as Grade 1 & 2, which is a key characteristic of the wider landscape and important for the local economy.
E3: Promoting Winterton-on-Sea's Heritage	Section 16	This policy intends to set out a positive strategy for conserving WoS's heritage, particular the historic village centre.
E4: Surface Water Flooding and Drainage	Section 14	This policy will help to adapt to climate change and ensure that surface water is managed appropriately and sustainably.
CA1: Winterton-on-Sea Primary School	Para 121	This policy supports the sustainable future of WoS Primary School, recognising that more effective use of the site may be required in future to assure the schools continued provision and role as a key community asset.
CA2: Economic Development	Section 6, para 92, 102, 109	Supports sustainable new business and services, subject to demonstrating it does not exacerbate existing and significant traffic and parking problems within the Historic Village Centre. It positively seeks to provide for the development needs of the community.
CA3: Local Green Space	Section8, Para 8 and Paras 99-101	The policy supports protection of 7 green open spaces and designates local green space in accordance with the NPPF requirements.
CA4: Investment in open space	Para 96, 98	The policy promotes improvements to accessible existing open space provision and public rights of way.
TR1: Public car parking	Para 91, 92	Parking, especially for visitors, is a key constraint within the WoSNP area and one which significantly impacts upon the quality of life of residents. This policy supports additional off-road parking opportunities, which would enhance cohesion, wellbeing of residents and public safety.



WOSNP Policy	NPPF Cross References	Comments
TR1: residential car parking standards	Section 9, para 105	The policy sets out a minimum requirement for off road parking.
TR2: Walking	Section 9, para 91	The policy promotes improvements to encourage safe and convenient walking within the parish



## Section 4: Sustainable Development

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15. Sustainable development is defined as ‘development that meets the needs of the present without compromising the ability of future generations to meet their own need’<sup>1</sup>. It is about ensuring better quality of life for everyone, now and for generations to come. In doing so, social, environmental and economic issues and challenges should be considered in an integrated and balanced way.
16. This is captured by Paragraph 8 of the NPPF in particular, which summarises the three interdependent objectives. **Figure 2** includes a number of references to NPPF para 8, demonstrating the policies in WoSNP that have due regard to these overarching objectives.
17. The NPPF as a whole represents sustainable development, and **Figure 2** sets out that WoSNP is very consistent with the NPPF. It should therefore be the case that WoSNP will help to deliver sustainable development in Winterton-on-Sea through delivering the economic, social and environmental objectives.
18. WoSNP is positively prepared, reflecting the presumption in the NPPF in favour of sustainable development, but it seeks to manage development pressures to ensure that, in addition to economic and growth considerations, reasonable environmental and social considerations are taken into account.

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<sup>1</sup> United Nations: Report of the World Commission on Environment and Development: Our Common Future, March 1987



## Section 5: General Conformity with Local Strategic Policies

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19. It is a requirement that WoSNP is in general conformity with the relevant local strategic policies. The Guidance on Neighbourhood Planning sets out what is meant by general conformity. When considering whether a policy is in general conformity with a qualifying body, independent examiner, or local planning authority, should consider the following:
- Whether the neighbourhood plan policy of development proposal supports and upholds the general principle that the strategic policy is concerned with;
  - The degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy;
  - Whether the draft neighbourhood plan policy of development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy;
  - The rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach.
20. The WOSNP area falls within two local authority boundaries, Great Yarmouth Borough Council (GYBC) and the Broads Authority (BA). The map at **Figure 1** demonstrates the area which falls within the Broads Authority Executive Area.
21. Both GYBC and BA have current Local Plans of which WoSNP is in general conformity with. Great Yarmouth Local Plan Core Strategy 2013-30 and Local Plan for the Broads 2015-36 contain the strategic policies of relevance for this neighbourhood plan. **Figure 3** reviews each policy with respect to the Core Strategy Policies and also relevant Development Management Policies from the BA Local Plan.
22. At the time of writing this statement GYBC are at Regulation 19 publication for their Local Plan Part 2 (LPP2), which is technically a stage ahead of WoS in plan-making terms. Although limited weight will be given to LPP2 at this time, it does contain some important strategic policies including UCS3 (Revised housing target), GSP1 (Development Limits), GSP2 (Neighbourhood Plan Target), GSP5 (Habitat Protection), GSP6 (Green Infrastructure), GSP7 (Cycling & pedestrian routes), and GSP8 (Planning obligations). In response to feedback from GYBC, WoSNP has been developed to reflect the emerging policies and in **Figure 3** below reference has also been made to how WoSNP is in conformity with the policies referenced above.



**Figure 3: General Conformity with Local Strategic Policies**

WOSNP Policy	GYBC Local Plan Cross-references	BA Local Plan Cross-references	Comments
HO1: Open Market Housing outside the Development Limits	CS2, CS3 Emerging LPP2: UCS3, GSP2.	SP15	This policy would only apply in circumstances where the application of the development limit can be afforded only limited weight, aiming to give some certainty to developers on how their application will be considered. It therefore supports and upholds the general principle of policies on strategic housing need and development limits. GYLP sets development limits, BA no limits/boundaries for Winterton. Emerging Policy GSP2 in LPP2 sets no housing target for WoS.
HO2: Housing mix	CS3	SP15, DM41	Policy provides additional local detail that will help ensure housing development meets the needs of the community based on the proportionate evidence base produced for the neighbourhood plan.
HO3: Affordable Housing	CS4	SP15	Policy CS4 (part d) of the GYLP sets out some requirements in relation to delivery of small rural exception sites. HO3 adds a WoS context to this, in particular providing a definition of adjacent and requirements in terms of sustainable travel options. Although SP15 of the Broads Local Plan is not supportive of small-scale rural housing schemes outside of the development boundary, the BA Exec Area is further than 50m from the development limits so it is not in conflict with this.
HO4: Design	CS3, CS4, CS9, CS10, CS12	DM8, DM43, SP3	Development expected to be of a high-quality design and enhance the character of the immediate area, with particular reference to the historic and eclectic architectural character of the village centre. Pointers given to ensure residential development blends well with existing, as set out in the Character Appraisal which accompanies the WoSNP. Innovative design and high environmental standards supported.
HO5: Principal Residence Housing	CS3	DM30	The policy provides additional local detail. Second home ownership is an issue within WoS (as demonstrated in the evidence base) and this policy looks to



WOSNP Policy	GYBC Local Plan Cross-references	BA Local Plan Cross-references	Comments
			restrict homes owned by those outside of the community. This is in general conformity with GYLP CS3 that focuses on ensuring new residential meets the housing needs of local people. DM30 of the Broads LP allows for second homes in exceptional circumstances only.
HO6: Tourist Accommodation	CS8	SP12, DM29, DM30	This policy supports the development of new tourist accommodation within WoS, helping to achieve a strong tourism sector within the borough (CS8). The policy explicitly applies outside of the Broads Authority Executive Area to avoid conflict with SP12 which is more restrictive.
E1: Protecting and enhancing the environment	CS9, CS11 Emerging LPP2: GSP5	SP6, DM8, DM13	This policy ensures that all new development contributes towards biodiversity improvement, incorporating natural features. In conformity with the emerging LPP2 policy GSP5, this policy seeks to protect and enhance the conservation of key European wildlife sites.
E2: High Grade Agricultural Land	CS6, CS11	SP4	The policy seeks to protect viable arable land where soils are identified as Grade 1 or 2, thus protecting geodiversity and the local economy. The policy applies outside of the BA Executive Area to ensure general conformity with SP4 Soils, which also protects grade 3a.
E3: Promoting Winterton-on-Sea's Heritage	CS9, CS10	SP5	This policy ensures that new development relates well to the built and historic characteristics of WoS, with particular reference to the Conservation Area and Historic Village Centre which the WoSNP defines, thus providing additional local detail to the local plans.
E4: Surface Water Flooding and Drainage	CS11, CS12, CS13	SP2, DM2, DM5, DM6, DM43	The policy ensures development is designed to reduce flood risk and manage surface water in a sustainable way. Policy also covers foul drainage, requiring connection to the mains, unless demonstrated this is not feasible.
CA1: Winterton-on-Sea Primary School	CS6, CS15	SP16	This policy seeks to support retention of WoS primary school by allowing complementary uses, setting a distinct local approach in conformity with the local plan policies.



WOSNP Policy	GYBC Local Plan Cross-references	BA Local Plan Cross-references	Comments
CA2: Economic Development	CS6, CS7, CS8	SP10	The policy supports proposals for small business within the development limits to better serve day-to-day needs of the community. This is subject to considering the impacts of visitor pressure on transport infrastructure, which provides a distinct local flavour that recognises the traffic constraints in the village centre.
CA3: Designated Local Green Spaces	CS11	DM7, DM8	This policy supports retention of green open spaces, designating local green spaces important to the character, wildlife and enjoyment of local people. These support healthy lifestyles and add to the network of green infrastructure locally.
CA4: Investment in open space	CS9, CS15 Emerging LPP2: H4	DM7, DM8	This policy promotes improvements to existing green open space and community assets, to encourage opportunity for healthy lifestyles. It provides distinct local detail.
TR1: Public Car Parking	CS8	SP16	This policy seeks to ensure there are adequate facilities available to support visitors and enhance the public realm in WoS.
TR2: residential car parking standards	CS9	DM23	This policy provides updated parking standards for WoS, providing an additional level of detail reflecting local character.
TR2: Walking	CS9, CS16	SP8	This policy supports the provision of safe and convenient routes for pedestrians, with infrastructure to be delivered alongside development.



## Section 6: EU Obligations

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### Strategic Environmental Assessment

23. In July 2019 a Screening Opinion request was made to GYBC as to whether Strategic Environmental Assessment and Appropriate Assessment (see **section 7**) was required. This was supported by a short report and assessment. In this WoSNP was assessed for likely significant effects upon the environment in light of the plan characteristics, the effects and area characteristics, including the environmental areas listed under Schedule 2 Part 6 of the EA Regulations (2004). The assessment recommended that SEA would not be required. This was supported by GYBC who undertook a screening and scoping exercise in consultation with the Statutory Environmental Bodies.

24. The GYBC Screening Opinion Conclusion was:

*In accordance with the 'Strategic Environmental Assessment Directive' and the Environmental Assessment of Plans and Programmes Regulations (2004), the Borough Council is satisfied to conclude that through the information submitted by the SEA Screening Assessment (subject to the above suggested amendments) and the statutory body responses along with this Screening Opinion, the draft Winterton-on-Sea Neighbourhood Plan is **not likely to have significant environmental effects**. The main reasons for this conclusion are that the draft neighbourhood plan:*

- largely conforms to the adopted Core Strategy*
- is to operate at relatively small scales*
- does not contain allocations*
- offers limited opportunity for new development*
- recognises its sensitive landscape and seeks to conserve and enhance its environmental assets.*

*The draft Winterton-on-Sea Neighbourhood Plan is therefore 'screened out'.*

25. **Section 7** of this report considers the requirement for Appropriate Assessment.

26. WoSNP has regard to and is compatible with the fundamental rights and freedoms guaranteed under the European Convention on Human Rights, transposed into UK law by the Human Rights Act 1998. WoSNP is highly likely to be compatible because it has been prepared within the existing framework of statute, and national planning policy and guidance. In accordance with established processes, its preparation has included consultation with the local community.

27. In conclusion, the WoSNP does not breach and is compatible with EU Regulations including:

- Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (often referred to as the Strategic Environmental Assessment (SEA) Directive);



- Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (often referred to as the Environmental Impact Assessment (EIA) Directive);
- Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora and Directive 2009/147/EC on the conservation of wild birds (often referred to as the Habitats and Wild Birds Directives respectively). These aim to protect and improve Europe's most important habitats and species. They may be of relevance to both neighbourhood plans or Orders; and
- Other European directives, such as the Waste Framework Directive (2008/98/EC), Air Quality Directive (2008/50/EC) or the Water Framework Directive (2000/60/EC) may apply to the particular circumstances of a draft neighbourhood plan or Order.



## Section 7: Prescribed Conditions

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28. There is one prescribed condition for Neighbourhood Development Plans identified in Schedule 2 of the Neighbourhood Planning (General) Regulations 2012:

*“The making of the neighbourhood development plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007), either alone or in combination with other plans or projects”.*

29. A Habitats Regulations Assessment (HRA) considers the implications of a plan or project for European wildlife sites, in terms of any possible harm to the habitats and species that form an interest feature of the European sites in close proximity to the proposed plan or project, which occur as a result of the plan or project being put in place, approved or authorised. Where likely significant effects are identified, alternative options should be examined to avoid any potential damaging effects.
30. HRA is a step by step decision making process. It can be broken down into four stages. Screening; Appropriate Assessment; Alternative solutions; imperative reasons of overriding public interest and compensatory measures.
31. A screening assessment was undertaken on WoSNP (draft April 2019) to determine whether it will have ‘likely significant effects’ upon internationally designated habitat sites. While the designated plan area does include Winterton-Horsey Dunes Special Area of Conservation, the draft Neighbourhood Plan does not allocate sites for development. Many of the policies seek to conserve and enhance the natural environment. There is a specific policy around off-street parking, to alleviate current constraints in the village centre, this was assessed as unlikely to result in additional spaces for visitors. In this context the plan is unlikely to present additional residential or recreational disturbance beyond that identified in GYBC’s Local Plan Core Strategy.
32. A number of amendments to the submitted HRA Screening Assessment were recommended and have been made.
33. HRA Screening Opinion Conclusion was:

*As Competent Authority and in accordance with the Conservation of Habitats and Species Regulations 2017, the Borough Council identifies **no ‘likely significant effects’** on nearby internationally protected wildlife sites (particularly Winterton- Horsey Dunes SAC) resulting from the draft Winterton Neighbourhood Plan either alone or in combination with other projects and programmes. No ‘appropriate assessment’ or full ‘Habitat Regulations Assessment’ is therefore required.*



## Appendix A

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In December 2020 GYBC and the BA undertook a Healthcheck on the WoSNP. Below are the comments provided and how they were considered in finalising the plan for formal submission.

### Comments received from Great Yarmouth Borough Council

**Paragraph 25:** The text to this paragraph is potentially misleading as the Neighbourhood Plan does not contain any housing allocations. As such it is highly unlikely that it could be argued that Paragraph 14 would apply. Another thing to consider is that the arrangement only applies for two years following a plan being made. This is at a time when the Borough Council is about to publish a deliverable housing land supply in excess of 6 years. **Removed reference to Para 14, retained remainder of para.**

### Policy HO1: Open Market Housing outside the Development Limits

If paragraph 11d) of the NPPF was triggered (due to GSP1 being out of date as a result of a lack of five year supply or failure to meet the housing delivery test), Policy HO1 would also be out-of-date if considering a proposal which was contrary to it and therefore could only be afforded limited weight.

The presence of the policy in the plan if anything would give an indication that development which meets the criterion of the policy is less harmful and despite the caveats in the first paragraph, the policy could be used as justification for development outside of the development limits even where there is a five year supply. Additionally, in circumstances where there is no five-year supply, the proposals in the policy may be actually less strict than the application of the NPPF in the context of Winterton.

Some of the wording uses in the policy is not particularly precise or qualified by the supporting text and only repeat key planning considerations in the NPPF.

In conclusion, I do not see a need for this policy, but more importantly, it appears contrary to the NPPF. It will have limited weight in such circumstances and I cannot think of any real examples of such proposals coming forward in Winterton. I therefore recommend that the policy is removed from the plan.

**Policy removed from the plan.**

### Policy HO2: Housing mix

A problem could be permitted development rights. The supporting text could suggest the removal of permitted development rights from new properties. **Added reference to permitted development rights.**

### Policy HO3: Affordable housing

The policy does not add any detail really to that existing in Core Strategy Policy CS4 and paragraph 71 of the NPPF. The only element that is additional is the connection to local services and sustainable means of transport, though these would be picked up through usual considerations for such developments (e.g. policies CS1, CS2, and CS16) and the definition of adjacent.

The Borough Council does not support a scheme that is up to 50m from the existing Development Limits. The Borough Council strongly disagrees with this arbitrary and generous



definition of adjacent, meaning up to 50m. The policy therefore conflicts with Policy CS4 and emerging Policy GSP1.

**As it currently stands exception sites for affordable housing do not come forward in WoS and there have been no new affordable homes in the last five years. Furthermore, the 2020 AMR reports that affordable housing need far outstrips supply. The AMR does not mention any Rural Exception Sites coming forward and so it is likely that the current expectation that they are abutting settlement boundaries is acting as a barrier.**

**Therefore, the community would like to encourage affordable housing and see this policy as a way of doing so. The decision has been made to change 50m to 'reasonably' adjacent, adding that it is not necessary for sites to be touching and some degree of separation is allowed. The plan has to be in general conformity with the NPPF, with departures allowed where there is reasoned justification. It is felt that reasoned justification has been provided within the plan to include the word 'reasonably' rather than just adjacent. It is not felt that this is in conflict with the GYLP.**

#### **Policy HO5: Principal Residence Housing**

There is still concern at how this can be enforced, and whether such occupancy conditions are justified and can be upheld.

This policy and policy HO6 support tourist accommodation. Such accommodation cannot be restricted by the same condition. This may provide a loophole to 'principal accommodation'.

**This policy has been used elsewhere and tested in the courts which upheld the policy.**

#### **Policy HO6: Tourist Accommodation**

There is concern as to how the occupancy can be maintained as suggested in the policy. The Borough Council cannot prevent the same people from occupying the property throughout the year.

**There are normally occupancy conditions on holiday lets, restricting occupation to short periods.**

#### **Policy E1: Protecting and Enhancing the Environment**

This should not be applicable to 'any development coming forward'. For example, is this proportionate for a porch or small household extension. I believe that brownfield development is exempt in the Environment Bill. This needs to be amended. **Amended.**

What is 'Winterton PCC'? **This is the formal name of the County Wildlife Site.**

'Development will not be permitted where it results in harm to views of the dunes or beach from public viewpoints.' – it is not clear which area(s) this relates to. Should these be specified in the supporting text? Note that the AONB and Broads Area are already afforded the highest status of protection, therefore there is no need for the policy to repeat this. **Ok removed.**

#### **Policy E4: Surface Water Flooding and Drainage**

The [National Planning Practice Guidance](#), Site-specific flood risk assessment: Checklist (Part 6) and 'Other considerations', sets out how and when FRAs and SuDS should be required – this is for major developments (10 units or more) or areas of flood risk (Zones 2 or 3, or in a Critical Drainage Catchment). These elements will not apply to the whole parish or every development. Some developments do not require FRAs.



The policy should be re-worded to reflect these thresholds. It is unreasonable to request such information on applications below these thresholds without sufficient evidence. If there is evidence of work with the LLFA, this should be published.

**The policy does not require a flood risk assessment – just a surface water drainage strategy. This is required to demonstrate how developers will how deal with the known surface water flood risk, which does not seem unreasonable. The reference cited above relate to fluvial and now surface water flood risk. The NPPF has no guidance as to when an assessment should be required where there is surface water flood risk, whilst the NP policy provides this.**

**The requirement for development proposals coming forward in areas of low surface water flooding has been removed to make the requirement less onerous for developers.**

#### **Policy CA2: Economic development**

It is not entirely clear what types of ‘economic development’ are being supported. It might be worth setting out in the supporting text the type and use of businesses that would be supported. Also, small-scale is critical to avoid a development or use that would be inappropriate for the village – it would need to be compatible with the sensitive setting of the village. **This is set out in para 72.**

#### **Figure 5: Local Green Space**

I need to get this map amended for you. The legend is incorrect. It should show the greyed out area as ‘Outside of Winterton-on-Sea Neighbourhood Plan Area’.

#### **General comments**

Are there any arrangements to monitor or review the plan?

**According to PPG, “There is no requirement to review or update a neighbourhood plan”.**

#### **Evidence Base**

Affordable housing policy (page 7) – while Policy CS4 sets out the Borough’s approach. The Council is severely restricted by national requirements with the ‘major sites’ threshold and the need to consider viability. Each of these would also apply to any neighbourhood plan policy.

Natural Environment – It may be worth referring to the relevant protected species that can be found including little terns, adders and Natterjack toads. It would also be hard not to mention the large seal population visits.

#### **Consultation Statement**

No comments.

#### **Statement of Basic Conditions**

For the reasons set out above, the Borough Council disagrees that the Neighbourhood Plan is in general conformity with the strategic policies of the local plan (Core Strategy) and has regard to the National Planning Policy Framework in respect of Policies HO1 and HO3. Representations were made by the Borough Council at Regulation 14, however, the changes made to the plan have not addressed these issues.



The Borough Council has included further comments and suggestions on other policies to aid clarity and interpretation, and ultimately the implementation of such policies by officers considering development proposals. These comments should also be carefully considered before submitting the final plan.

## **Comments received from Broads Authority**

### Comments on the Neighbourhood Plan

HO1 – I struggle with this. I find it a bit odd that there is such a policy that is only relevant if there is no 5 year land supply. I have not seen this before. If there is no five year land supply and the NPPF is triggered, how will this policy actually influence things? GYBC planners might have a view on this policy. It might be ok, but I personally struggle with it. **Policy removed.**

Regarding the 50m and adjacent approach. I do not agree with this.

- 50m away is not adjacent to and it is not very near or touching. Adjacent means next to or adjoining something else.
- The approach to such entry level and exception sites is adequately set out in national policy.
- I feel that by saying up to 50m away, it is contrary to national policy – see para 71b of the NPPF which says such sites are to be adjacent to settlements. It is also contrary to the Local Plan for the Broads as policy DM34 defers to GYBC's criteria for exception sites.
- Also, what is the justification for 50m as a distance? I cannot see any.
- Para 39 says 'reasonably adjacent' but footnote 2 correctly says that the NPPF requires such sites to be 'adjacent', with no use of the word 'reasonably'. As such, you need to remove 'reasonably' from para 39 as that is not what national policy says.
- The issue of adjacent continues through the Plan. At para 2 of policy HO4 on page 12 and TRS3 para 1 and then para 99 all talk of applications adjacent to the development limits, with no context. This could be interpreted as any development any time may be allowed adjacent to the development limits if it meets that criterion in the policy. So care needs to be taken when saying adjacent throughout the plan (if it needs to be included in the plan in the first place).

**We've changed this so that the policy supports rural exception and entry level exception sites that are reasonably adjacent to the development limits. This has regard to national policy, but takes a reasoned departure on the basis that affordable housing is much needed in WoS. The 2020 AMR for the borough reports that affordable housing need far outstrips supply. The AMR does not even mention any Rural Exception Sites coming forward and so it is likely that the current expectation that they are abutting settlement boundaries is acting as a barrier.**

HO2. Why is the threshold 5 dwellings? It seems that windfall schemes could be smaller in size. So this policy might not apply to many schemes. **According to the evidence base this is the average size of development over the last five years.**

Second homes section – is this saying that second homes cause issues but holiday homes do not? In trying to justify this policy, can it be explained why holiday homes seem to be welcomed, but second homes not? It is not clear at the moment. Para 48 goes some way, but



I feel you may need more explanation. **Have added some text which reflects the community's perspective on this. Holiday homes might also cause an issue but balanced against this is the likely economic benefits from tourism and holiday spend.**

HO5 – rather than saying Great Yarmouth Borough Council, you could say 'Local Planning Authority' in para 2. That covers things if development is in our area. **Applies specifically to GYBC area.**

E2 – did you want to say that this does not apply to the BA area in the policy? You say that in other policies. **Intention is for this to apply to BA area too.**

Para 70 – perhaps mention that BA does not have a CIL. Not sure if GYBC does? **Added.**

Para 71 and policy CA1 – I got the impression from para 71 that the school was of utmost importance. I thought the field centre would be complementary. But CA1 seems to say the primary school could be replaced by something else like an education centre, so would be lost. It might be worth checking the message that is being given. **Have clarified.**

CA2 – I see that the bullet points are separated by an 'or'. But by meeting the second bullet point, there could still be parking on street adding to the issues that are described throughout the plan. It might be worth checking the message that is being given. **Originally there was an 'and' but this was considered too restrictive, the working group choose to accept an increase in parking if there was not a material increase in traffic.**

TR1 – I don't understand why, if parking is such a problem, there is scope to redevelop parking and not necessarily provide an alternative. You may want to explain this a bit more.

#### Heritage officer comments

Para 42 it states that the houses are diverse in terms of their height – I think you could accurately say that they are predominantly single storey or of two storeys. Could some of this be re-worded to say, 'Many of the houses in the village centre are historic and are diverse in terms of their architectural style and the materials used, which is characteristic of the village's built environment'? I'm not sure I would focus any more on the 'randomness' of design, as I'm not sure it will help in assessing new developments (e.g. people could submit anything and say it adds to the randomness of design in the village centre). Also they go on to reference the Character Appraisal, which does give details of the predominant materials etc. **Amended.**

Para 65 – I think there is a single Winterton-on-Sea Conservation area (GYBC Conservation area no. 9) that is split into two separate areas. **Amended.**

Para 66: The proposed Historic Village Centre – I am not sure why they want to include the east side of Winner Avenue? I can understand the green being included. What are the benefits of a new designation of Historic Village Centre? **This is something the community felt strongly about.**



Policy E3: Should it be 'Protecting' rather than 'Promoting'? Promoting feels to me more like a tourist-initiative, perhaps with interpretive signs about historic buildings and areas? **Amended.**

Policy E3: Views of the church which are of particular importance and could be mentioned (or in the supporting text). **Added.**

Policy E3: Should this policy make reference to the requirement for alterations to existing buildings to enhance the character of the area. **Decision not to add this.**

In a couple of places in this document and some of the supporting documents (e.g. the Evidence Base and key Issues document) they make reference to locally important 'landmark' buildings, in particular the Fisherman's Rest PH, the lighthouse, the Hermanus Holiday Park roundhuts. I would suggest that these are candidates for local listing and perhaps this is an exercise they should consider as part of the NP process? GYBC could provide their criteria for local listing. Other candidates for consideration would be the former Methodist Chapel on Beach Road, Corner Croft on Back Road and the row of mid-20<sup>th</sup> century thatched cottages along The Lane. **Could be considered when the NP is reviewed.**

**Note that most of the comments have been applied, but these are not considered to be relating to the basic conditions.**

#### Evidence base

The deprivation data is 2015. There is 2019 information available now. Are you able to assess the 2019 information and compare and amend as required?

Page 9, crime – this is from 2018. It is now nearly 2021. I suggest you update this.

Again Figure 14 is 2018. Figure 15 is 2016/17. It seems prudent to update them.

Given that some information in the document is a few years old, what date is the flood risk data? Is that current and up to date? If not, suggest you add in up to date information and then check the implications on policies in the NP.

As stated in the comments to the NP, I cannot see evidence to back up the 50m approach.

**Additional addendum produced to update evidence which has been superseded.**

#### Second and Holiday homes

I see that this relies on Census data. The 2011 Census data is quite old. You could use Council Tax data as that would be more up to date. Considering the implications of the policy, I wonder if it is prudent to contact GYBC and ask for council tax data showing second homes in the ward? I see now that Council Tax data is referred to on page 2, but in a short para. To me, that is the main and most up to date evidence and I wonder if more needs to be made of it? Also, what date is the Council Tax data from? What is the detail of the Council Tax data? Again, if a few years old, it might be worth updating. **As much info as provided by GYBC included in the report.**

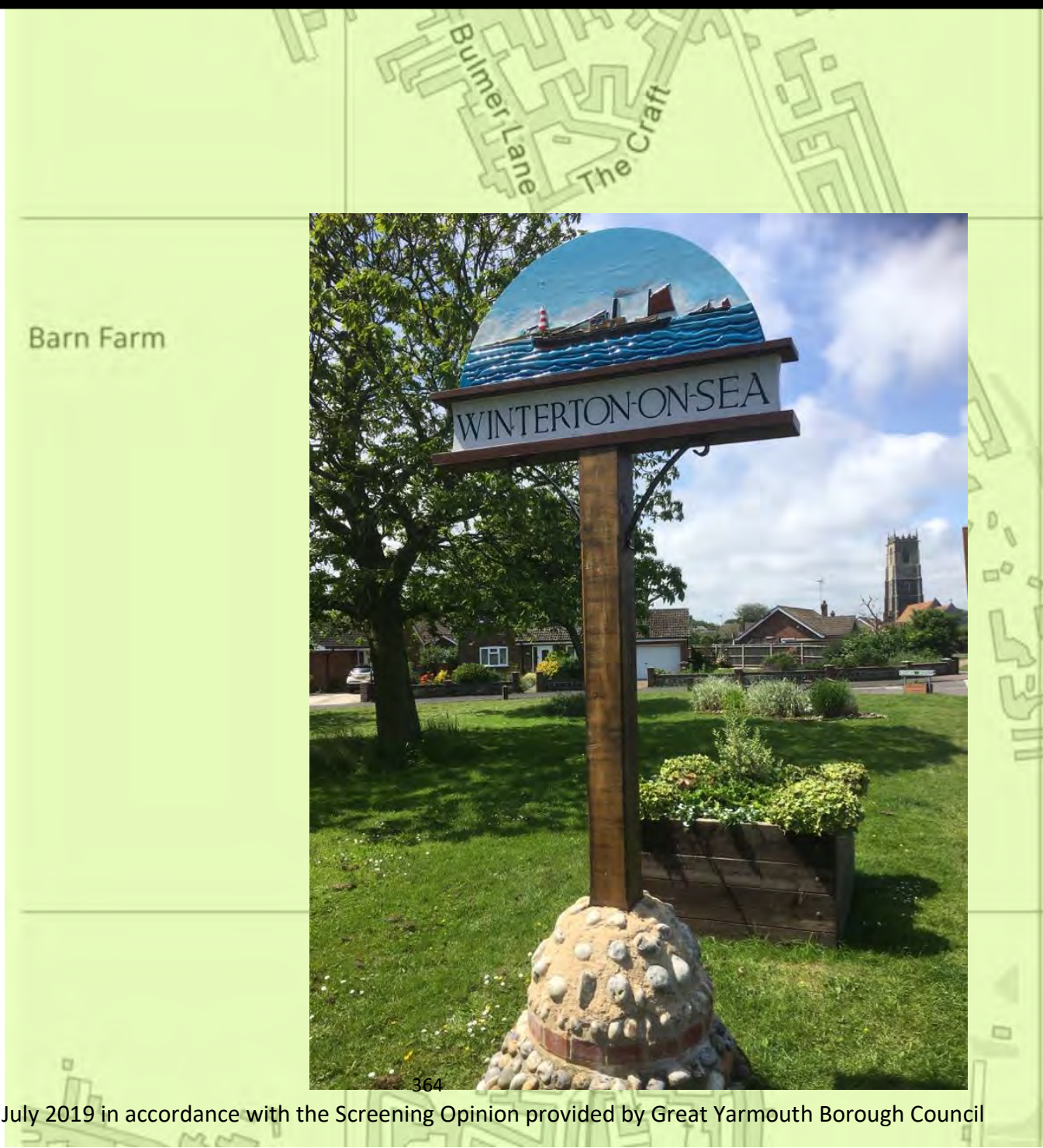


There does not seem to be a final conclusion and recommendation in the study. That might be appropriate. **Final conclusion and recommendation added.**





# Winterton-on-Sea Neighbourhood Plan





# Contents Page

	Page
Introduction	2
Legislative Background	4
Screening Process	5
Assessment	5
Conclusions	13



# 1.Introduction

## Neighbourhood Plan Area

The Winterton-on-Sea Neighbourhood Plan Area has been designated to cover the entire parish.

**Figure 1: Designated Area**





## Vision

Winterton-on-Sea is a thriving community and popular visitor destination, providing a range of local services and facilities. There is a good balance between the needs of residents and those visiting for the day or longer. It has the quiet, laid-back feel that is fitting for an old fishing village, with low traffic volumes and speeds away from the main roads.

The village has a good mix of housing, including homes for younger residents and families, which has been designed sensitively and reflects the local character.

The natural environment, including the sensitive dunes, is precious to the community and its condition and ecology has improved in recent years.

## Objectives

- **Housing:** To support the provision of affordable housing so that Winterton-on-Sea is a place where people of all ages can live.
- **Sustainable services:** To support services, clubs and facilities that offer opportunities for enhancing the wellbeing of residents and encourages visitors to spend locally.
- **Infrastructure:** To provide the right infrastructure to ensure that visitors to the village do not place additional pressure on environmentally sensitive areas.
- **Recreation and accessibility:** To improve the walkability of the village and connections to the wider countryside and surrounding communities such as Hemsby.
- **Traffic and transport:** Seek opportunities to reduce the impact of vehicular traffic and parking in the village centre.
- **Environmental protection:** To protect, promote and enhance the sensitive landscape and habitats of the dunes and beach so that they are prioritised over future development.

## Draft Planning Policies

The neighbourhood plan for Winterton-on-Sea contains policies that seek to deliver the vision, it does not identify or propose allocation of specific development sites within the parish. Below is a summary of key points from the draft policies.

### Housing:

- Support for development proposals that meet local and strategic policies and meet criteria in relation to the settlement boundary
- Promote smaller unit housing and homes suitable for younger and older residents



- Support small scale rural or entry level exception sites for affordable housing outside the settlement boundary
- High quality design that complements the character and appearance of the parish
- Focus any new housing development on principal residence housing
- Support for tourist accommodation that encourages the local economy

#### Environment:

- Protect and enhance environmentally sensitive areas such as the dunes
- Protect the best and most versatile agricultural land
- Development should preserve and enhance the character of Winterton-on-Sea's Conservation Areas, including the Historic Village Centre
- Requirement for Flood Risk Assessments and Surface Water Drainage Strategy

#### Community Assets

- Support for proposals that encourage sustainability of the village primary school
- Support for small scale business, subject to parking and traffic considerations
- Identification of 7 Local Green Spaces of community value for protection
- Investment in existing open space assets

#### Traffic and Transport

- Off road parking standards for new dwellings
- Support for public car parking proposals subject to no increase in traffic through the village centre.
- Encourages development that promotes safe and convenient walking within the parish.

## 2. Legislative Background

To be 'made' a Neighbourhood Plan must meet certain Basic Conditions. These include that making of the plan 'does not breach, and is otherwise compatible with EU obligations'. One of these obligations is Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'. This is often referred to as the Strategic Environmental Assessment (SEA) Directive. This seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing plans and programmes. The SEA Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (the SEA Regulations) and it is these regulations that the plan will need to be compatible with. A key stage in the Neighbourhood Planning process is determining whether or not SEA is required.

As a general rule of thumb, SEA is more likely to be necessary if:

- A Neighbourhood Plan allocates sites for development
- The Neighbourhood Plan area contains sensitive environmental assets that may be affected by the policies or proposals
- The Neighbourhood Plan is likely to have significant environmental effects not already addressed through the Sustainability Appraisal of the relevant Local Plan.

Another key obligation is Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, often referred to as the Habitats Directive. Under the Habitats Directive an assessment referred to as an Appropriate Assessment must be undertaken if the plan in question is likely to have a significant effect



on a European protected wildlife site. The SEA Directive requires that if a plan or programme requires an Appropriate Assessment under the Habitats Directive, then that plan or programme will also require an SEA.

## 3. Screening Process

Three steps will be followed for this screening process:

1. Preparation of a screening report – this report
2. Request a screening opinion from the consultation bodies in light of the report – Great Yarmouth Borough Council responsibility
3. In light of their responses, determine whether the plan is likely to have significant effects on the environment (and therefore require an SEA) – Great Yarmouth Borough Council in discussion with Winterton-on-Sea Parish Council.

## 4. Assessment

### SEA Screening Assessment

Policies set out in the draft Neighbourhood Plan have been used to undertake this screening assessment. If the conclusion of the screening exercise is that SEA is not required, any major changes to existing policies or introduction of new ones will be subject to further screening to ensure significant effects are not likely.

**Figure 2: Impact of WoSNP on environmental characteristics of the area**

Characteristic	Identification within the Neighbourhood Plan Area	Likely impact of Neighbourhood Plan
National Nature Reserve	Winterton Ness Dunes	Positive impact – WoSNP aims to protect the dunes, including a policy that supports positive conservation. More generally any development is required to deliver ecological gain.
Natura 2000 sites – SPAs & SACs	Winterton-Horsey Dunes are designated a Special Area of Conservation and the Greater Wash is designated a Special Protection Area	Positive impact – WoSNP aims to protect the dunes, including a policy that supports positive conservation. More generally any development is required to deliver ecological gain. The plan will have negligible additional recreational pressures.
Sites of Special Scientific Interest SSSI	Winterton Horsey Dunes	Positive impact – WoSNP contains a policy that specifically references the SSSI, recognising that this is already protected in national policy, but seeking to clarify local expectation. Policy aims to protect the dunes, including supporting positive conservation. More generally any development is required to deliver ecological gain. There are also policies to improve existing open spaces, including Public Rights of Way, which will divert some recreational activity away



Characteristic	Identification within the Neighbourhood Plan Area	Likely impact of Neighbourhood Plan
		from the dunes. The plan will have negligible additional recreational pressures.
National Parks	The Broads has equivalent status	Positive impact – WoSNP aims to protect the dunes, including a policy that supports positive conservation. More generally any development is required to deliver ecological gain. The plan will have negligible additional recreational pressures.
Areas of Outstanding Natural Beauty	Norfolk Coast Area of Outstanding Natural Beauty	Positive impact: WoSNP contains policy protecting the coast, including dunes and beach, including the requirement that development does not interrupt public views of the beach or dunes. There is an expectation that any development proposals deliver ecological gain.
World Heritage Sites	None	-
Scheduled Monuments	None	-
Locally designated nature conservation sites	There are 3 County Wildlife Sites in Winterton-on-Sea, 1 is parish council land and includes the allotments. The other 2 are woodland to the north of the settlement.	Positive impact: Whilst CWSs already have certain protections WoSNP contains policy that recognizes their importance and supports development proposals that incorporate significant and demonstrable conservation and/or habitat enhancement to improve their biodiversity.
Biodiversity Action Plan Priority Habitat	This includes the Horsey-Winterton Dunes with features – foredunes, yellow dunes, dune grassland, slacks and dune heath and little terns.	Positive impact – WoSNP aims to protect the natural environment, seeking development that achieves a net ecological gain.
Nationally listed buildings	Winterton-on-Sea has 3 listed buildings – the church, memorial to Clement Trotter and the War Memorial. All of these are clustered in the older part of the village around the church.	Positive impact – WoSNP aims to protect and enhance the cultural heritage of the parish. The plan specifically identifies a Historic Village Centre, requiring any development sensitive and appropriate to this and the wider Conservation Areas.
Buildings at risk	None	-
Conservation area	Two within the NP area	Positive impact – the plan seeks to preserve the setting of the two conservation areas.
Flood Zone 3	There are areas of higher flood risk, particularly in the north of the settlement, as identified in the Borough Council's Strategic Flood Risk Assessment.	Positive impact - WoSNP seeks to ensure that future development mitigates its own flood risk.
Areas with surface water flooding issues	Flood risk from surface water affects many parts of Winterton-	Positive impact – WoSNP requires that proposals coming forward in areas of high, medium or low risk of surface water flood risk, or all



Characteristic	Identification within the Neighbourhood Plan Area	Likely impact of Neighbourhood Plan
	on-Sea village, including the village centre.	developments of 5 or more properties will need a Surface Water Drainage Strategy.
Air Quality Management Area	None in the vicinity.	-
The best and most versatile agricultural land	A small area of the WoSNP area to the south of the built-up area is classified as Grade 1 Agricultural Land	Positive impact: WoSNP seeks to protect the best and most versatile agricultural land, only permitting development where special circumstances can be demonstrated.
Source Protection Zones	None	-

**Figure 3: Assessment of the likelihood of significant effects on the environment**

Note that this assessment has been made based on criteria from Article 3.5 of the SEA Directive.

Criteria for determining likely significance of effects	Is the WoS Neighbourhood Plan likely to have a significant effect	Justification for decision
The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	No	The WoSNP does not include any site-specific development proposals, however, it does contain policies that aim to manage development in the parish. These policies are in general conformity with the adopted and emerging Local Plan of Great Yarmouth Borough Council.
The degree to which the plan or programme influences other plans and programmes including those in the hierarchy.	No	Once 'made' the WoSNP will form part of the adopted Local Development Plan, setting a number of non-strategic policies that are in general conformity. It does however contain a rural exceptions policy that may permit development proposals exclusively for affordable housing on small sites that would not otherwise be appropriate for housing, subject to Housing Needs Assessment. This accords with national policy. Whilst this goes beyond the level of development permitted by the current Local Plan, it does so only within Winterton-on-Sea and not considered significant enough to trigger the requirement for SEA. Any individual environmental matters would be dealt with on a site by site basis.



Criteria for determining likely significance of effects	Is the WoS Neighbourhood Plan likely to have a significant effect	Justification for decision
The relevance of the plan or programme for the integration of environmental considerations.	No	See Figure 2: Impact on Environmental Characteristics of the Area. Whilst impacts are identified, many of these are positive, and unlikely to be of a significant nature.
Environmental problems relevant to the plan or programme.	No	None identified.
The relevance of the plan or programme for the implementation of Community legislation on the environment.	No	WoSNP generally conforms with the Great Yarmouth Local Plan.
The probability, duration, frequency and reversibility of the effects	No	WoSNP does not contain any site-specific development proposals. It will however influence development, expecting it to have minimal impacts on the natural environment and heritage assets. The timeframe of the plan is to 2039.
The cumulative nature of effects.	No	WoSNP will not lead to any cumulative effects in combination with any existing or emerging plans. The emerging Local Plan for Great Yarmouth will be subject to a full Sustainability Appraisal, which will look at these matters in more detail.
The transboundary nature of the effects.	No	The nearby community of Rollesby is developing a Neighbourhood Plan and links with this have been considered when drafting the WoSNP. Other nearby communities, including Hemsby, have declared a neighbourhood plan area but are at a very early stage of development.
The risks to human health or the environment.	No	No risks to human health have been identified. Policies within the WoSNP seek to protect the environment.
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	No	Impacts of WoSNP will be confined to Winterton-on-Sea Parish and are unlikely to extend beyond this. The current population (mid-year estimate for 2016) is 1,295 so the plan will impact upon a relatively small population of people.
The value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> <li>• Special natural characteristics or cultural heritage</li> <li>• Exceeded environmental quality standards or limit values of intensive land-use</li> </ul>	No	See Figure 2. Some positive beneficial impacts are anticipated, but due to the low quantum of development anticipated in Winterton-on-Sea, it is not considered that impacts will be significant.



Criteria for determining likely significance of effects	Is the WoS Neighbourhood Plan likely to have a significant effect	Justification for decision
<ul style="list-style-type: none"> <li>The effects on areas or landscapes which have a recognized national, community or international protection status.</li> </ul>		

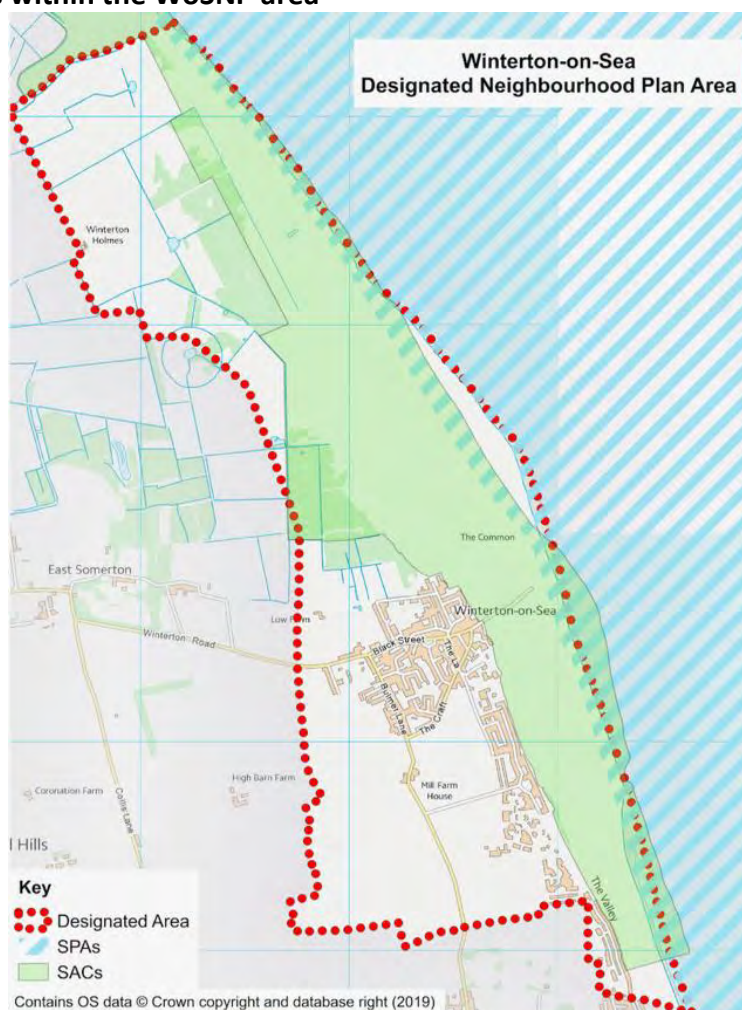
## Habitats Regulations Assessment

The Habitats Regulations Assessment (HRA) refers to the assessment required for any plan or project to assess the potential implications for designated European wildlife sites. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar Sites, collectively known as internationally designated wildlife sites.

There are two designated European wildlife sites in the Winterton-on-Sea Neighbourhood Plan area. This includes:

- The Winterton-Horsey Dunes which is a Special Area of Conservation
- Great Yarmouth North Denes which is a Special Protection Area

**Figure 4: European Sites within the WoSNP area**





This screening assessment has also considered the impact on European sites within 15km of the neighbourhood plan area, as an in combination assessment area. These include:

**Figure 5: European Sites within 15km of WoSNP area**

Special Areas of Conservation	Special Protection Areas	Ramsar Sites
Winterton-Horsey Dunes	Broadland	Broadland
The Broads	The Greater Wash	Breydon Water
Haisborough, Hammond & Winterton	Outer Thames Estuary	
Southern North Sea	North Denes	

**Figure 6: Impact of WoSNP Policies on European Sites**

Policy	Significant Effect Likely	Comments
HO1: Settlement Boundary and Residential Development	No	This policy does not allocate land for development. It requires development proposals to meet national and local policy and criteria in relation to the settlement boundary. It is therefore considered this policy will have no significant effects on the identified European Sites.
HO2: Housing Mix	No	The policy does not allocate land for development. It requires that proposals provide a mix of housing types, especially smaller unit housing and homes for younger people. It is therefore considered this policy will have no significant effects on the identified European Sites.
HO3: Affordable Housing	No	The policy does not directly allocate land for development and aligns itself with the local plan policy. It allows for small scale exception site proposals situated up to 50m outside the development boundary. Although it supports development proposals within the plan area, these are strongly considered to be of a local scale and potential effects will need to be assessed by site-specific HRAs identifying any necessary mitigation measures. The Borough Council has an adopted Habitats Monitoring and Mitigation Strategy and guidance to address in-combination effects from increased recreational disturbance at the site-specific level.
HO4: Design	No	This policy does not directly allocate land for development, it focuses on controlling the design of new housing when it is brought forward within the plan area. Such development may have some effects on the identified sites, but it is anticipated that any development would be of a local scale and will be managed and mitigated through the planning application process. It is therefore considered this policy will have no significant effects on the identified European Sites.
HO5: Principal Residence Housing	No	This policy does not directly allocate land for development but requires any new housing to be restricted in perpetuity to ensure it is only occupied as a principal residence. Although it supports development proposals, these would be of a local scale



Policy	Significant Effect Likely	Comments
		and will be managed and mitigated through the planning application process. It is therefore considered that this policy will have no significant effect on the identified European Sites.
HO6: Tourist Accommodation	No	This policy does not allocate land for development but supports proposals for new tourist accommodation that encourages the local economy where such proposals are well related to the village or make use of existing buildings. Any such development proposals would be of a local scale and potential effects will need to be assessed by site-specific HRAs identifying any necessary mitigation measures. The Borough Council has an adopted Habitats Monitoring and Mitigation Strategy and guidance to address in-combination effects from increased recreational disturbance at the site-specific level.
E1: Protecting and Enhancing the Environment	No	This policy does not allocate land for development and ensures that the protection and enhancement of identified environmental sites, including the dunes, is considered when development proposals are assessed. It supports proposals that will promote the preservation and restoration of the dunes and beach. It is therefore considered this policy will have no significant effects on the identified European Sites.
E2: High Grade Agricultural Land	No	This policy does not allocate land for development in the plan area. It seeks to protect high grade agricultural land from development by ensuring special conditions are taken into account when development proposals are considered. It is therefore considered to have no significant effect on the identified European Sites.
E3: Promoting Winterton-on-Sea's Heritage	No	This policy does not allocate land for development in the plan area. It ensures that the protection and enhancement of the landscape and character of Winterton-on-Sea is taken into account when considering development proposals. It is therefore considered to have no significant effect on the identified European Sites.
E4: Flooding and Drainage	No	This policy does not allocate land for development. It requires any development proposals that should come forward to take into account flood risk and drainage. This policy will have no significant effect on the identified European Sites.
CA1: Winterton-on-Sea Primary School	No	This policy does not allocate land for development but has regard to improving the sustainability of Winterton-on-Sea's Primary School. It is considered to have no significant impact on identified European Sites.
CA2: Economic Development	No	This policy does not directly allocate land for development but encourages development proposals for small business that can demonstrate adequate parking provision and that there is not a material increase in traffic in the village centre, which is nearest the dunes. It is therefore considered this policy will have no significant effect on the identified European Sites.



Policy	Significant Effect Likely	Comments
CA3: Local Green Space	No	This policy does not allocate land for development. It ensures protection of 7 designated Local Green Spaces of community value within the parish. It is therefore considered this policy will have no significant effect on the identified European Sites.
CA4: Investment in Open Space	No	This policy does not allocate land for development. It requires any development proposals to make a contribution towards the provision of high-quality open space. Any enhancement of green open space provision, particularly footways linking nearby settlements, could reduce existing recreational pressure, ie dog walking, on the Winterton-Horsey Dunes. The policy also supports the principle of open space contributions funding provision of a new public car park. This would be proposal specific and need to conform with Policy TR1, see below. It is therefore considered this policy will have no significant effect on the identified European Sites.
TR1: Public Car Parking	No	This policy does not directly allocate land for development, but supports the continuation of existing car parking provision at the beach and supports additional provision of public car parking outside of the village centre. Additional car parking provision seeks to address known parking constraints within the parish, including congested parking along beach road and in the historic village centre. This could potentially lead to an increase in recreational pressure on the Winterton-Horse Dunes SAC, however this is considered to be limited as would be designed to address local on-street parking concerns, providing alternative free parking, rather than additional. Therefore, although there could be an impact, this is considered not to be significant.
TR2: Residential Car Parking	No	This policy does not allocate land for development, but ensures that off road vehicle parking is taken into account when development proposals are being considered. It is therefore considered this policy will have no significant effect on the identified European Sites.
TR3: Walking	No	This policy does not allocate land for development. It encourages development proposals to enhance and improve access to surrounding countryside, green infrastructure and village facilities, connecting with existing footpaths and footways. Such development and associated improvements to walking infrastructure could place additional recreational pressure on the Winterton-Horsey Dunes SAC, though it could also help to confine people to the Public Rights of Way, rather than the dunes in general. Development proposals within the plan area would be of a local scale and will be managed and mitigated through the planning application process. It is therefore considered this policy will have no significant effects on the identified European Sites.

#### In combination effects



Existing plans and proposals must be considered when assessing new plans or programmes for likely significant effects as they may create 'in combination' effects. For the Winterton-on-Sea Neighbourhood Plan the existing plans to be considered are Great Yarmouth Borough Council Local Plan, which has been through rigorous assessment with regards to their impact on European Sites. The neighbourhood plan has been produced to be in strategic conformity with both of these documents. In addition, no sites have been allocated for development within the plan. Therefore considered there is likely to be no in combination effects as a result of the Winterton-on-Sea Neighbourhood Plan.

It is concluded that the plan will not lead to a significant effect on the integrity of the European Sites identified above, and therefore does not require a full HRA to be undertaken.

## 5. Conclusions

### SEA Screening

On the basis of the SEA Screening Assessment set out in this document, the conclusion is that the Winterton-on-Sea Neighbourhood plan will not have significant environmental effects in relation to any of the criteria set out in Schedule 1 of the SEA Regulations, and therefore does not need to be subject to a full SEA. Note the following reasons:

- WoSNP supports implementation of the Great Yarmouth Borough Council Local Plan which has already been subject to SEA
- The WoSNP does not propose more development than is set out in the Great Yarmouth Borough Council Local Plan, though it is noted that the plan contains a policy that supports rural exception sites for affordable housing.
- The WoSNP represents a lower tier in the hierarchy of planning documents for Great Yarmouth Borough Council, and therefore has limited influence on other plans or programmes.
- The WoSNP seeks to avoid of minimise negative environmental impacts and has been assessed as having some positive impact on environmental characteristics in Winterton-on-Sea, though given the scale of likely development, these are not considered to be significant.

### HRA Screening

The HRA Screening Assessment concludes that no significant effects are likely to occur with regards to the integrity of the Winterton-Horsey Dunes SAC or Great Yarmouth North Denes SPA which fall within the plan area, or those European Sites that are located within 15km, due to the implementation of the plan. As such the plan does not require a full HRA to be undertaken.

The main reason for these conclusions are:

- The WoSNP does not directly allocate any sites for development
- The development that is supported in the plan which may have some effect on the environment is determined to be local in scale and these local impacts will be addressed and mitigated at the planning application stage.



# **SEA Screening Opinion for Winterton-on-Sea Draft Neighbourhood Plan (dated April 2019)**

**July 2019**





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## Contents

<b>SEA Screening Opinion</b>	<b>1</b>
Introduction [to SEA Screening]	
Background	
Strategic Plan	
Winterton-on-Sea draft Neighbourhood Plan proposals	
Responses from statutory consultees	2
SEA Screening Opinion Checklist	
SEA Screening Opinion Conclusion	4
 <b>HRA Screening Opinion</b>	 <b>5</b>
Introduction [to HRA Screening]	
Submitted HRA Screening Assessment	
HRA Screening Opinion Conclusion	6
 <b>Appendices</b>	
i. Environment Agency consultation response	7
ii. Natural England consultation response	8
iii. Historic England consultation response	12



## SEA Screening Opinion

### *Introduction*

This screening opinion determines whether or not the draft Winterton-on-Sea Neighbourhood Plan (April, 2019) is likely to have significant environmental effects and therefore require a Strategic Environmental Assessment (SEA) in accordance with the [European Directive 2001/42/EC](#) (the ‘Strategic Environmental Assessment Directive’) and implemented through the [Environmental Assessment of Plans and Programmes Regulations \(2004\)](#).

### *Background*

In order to meet one of the ‘Basic Conditions’ (tests that the neighbourhood plan is examined with), a neighbourhood plan must not breach or be otherwise compatible with the Strategic Environmental Assessment (SEA) Directive. In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a SEA. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a “screening” assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.

As part of the screening exercise, the neighbourhood plan will be assessed for likely significant effects upon the environment in light of across the ‘plan characteristics’, the ‘effects and area characteristics’ including the environmental areas listed under Schedule 2 Part 6 of the EA Regulations (2004) such as biodiversity and human health. In most cases, neighbourhood plans will not require a SEA, but are more likely to be required where the neighbourhood plan allocates sites for development, contains policies that may affect sensitive environmental assets, or where significant environmental effects have not been addressed through a sustainability appraisal of the local plan.

### *Strategic Plan*

The draft Winterton-on-Sea Neighbourhood Plan is largely in conformity with the Borough Council’s adopted Local Plan Part 1: Core Strategy. The Core Strategy was subject to a full Sustainability Appraisal (incorporating SEA) and ensured that generally there were no adverse environmental effects, and where there were effects these were adequately mitigated through the plan.

### *Winterton-on-Sea draft Neighbourhood Plan proposals*

The draft policies of this plan generally detail a restrictive stance on development, with particular focus to preserving both the historic character and sensitive environment of the settlement and parish. Within the designated neighbourhood area, the draft policies will seek to:

- support development within the development boundary, and restrict development outside of it
- support affordable housing, elderly housing, and lower occupancy housing
- discourage second homes



- encourage tourist development
- conserve and enhance habitats and higher graded agricultural land
- protect the historic character of the centre of the village
- expect mitigation measures against flooding and drainage
- support proposals that encourage continued use of the primary and nursery schools
- designates Local Green Spaces
- supports increased car parking space

Most of the policies focus new development within the settlement boundary which is tightly defined around the existing settlement, and development outside of the boundaries only permitted in exceptional circumstances. This approach combined with policies to enhance the surrounding sensitive environment, and existing local and national planning policies to protect environmental assets, will ensure that likely significant effects on the environment are negligible

A 'Habitat Regulations Assessment' (HRA) Screening Assessment has also been reviewed (this is detailed below), and this has fed in as part of the overall assessment of environmental effects.

#### *Responses from statutory consultees*

The relevant statutory 'consultation bodies' (Environment Agency, Natural England and Historic England) were consulted on the SEA Screening Assessment and the responses have been summarised as follows:

Consultation Body	Response
Environment Agency	No allocations, many environmental constraints, but, confirmed that they do not disagree with the conclusion reached.
Natural England	No specific comments on this draft neighbourhood plan.
Historic England	On the basis of the information supplied, concur with the Parish Council that the preparation of a Strategic Environmental Assessment is not required.

The full consultation body responses are appended to this opinion.

#### *SEA Screening Opinion Checklist*

The neighbourhood plan has been assessed using the 'Practical Guide to SEA Directive's' application chart.

SEA guide criteria	Yes/No	Reason
Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	If passed through a referendum, the neighbourhood plan becomes part of the Borough Council's adopted Development Plan.
Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	Communities have the choice to prepare a neighbourhood plan. However, because the plan (if adopted) will form part of the Development Plan, it must be screened for SEA
Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport,	Yes	The neighbourhood plan is prepared for town and country planning and land use.



SEA guide criteria	Yes/No	Reason
waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))		The plan sets out a framework (within the neighbourhood plan area) for future development of houses, tourism uses, and community uses, which may fall under parts 10 and 12 of Annexe II of the EIA Directive.
Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	No	For full details, see this HRA screening opinion.
Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Yes	The neighbourhood plan does not specifically allocate any sites for development. The policies relating to residential and tourist development have the potential to lead to small areas of development, and the plan designates 'Local Green Spaces'.
Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Yes	The Neighbourhood Plan sets a framework for future development within the neighbourhood plan area.
Is the PP's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)	No	This is not applicable to neighbourhood plans
Is it likely to have a significant effect on the environment? (Art. 3.5)	No	The plan has been assessed for having "likely significant effects" across the 'plan characteristics', the 'effects and area characteristics' including the environmental areas listed under Schedule 2 Part 6 of the EA Regulations (2004). Overall, the plan is considered to have a negligible effect on the environment. While there are several sensitive environmental assets (Winterton-Horsey Dunes SAC, in particular) within the neighbourhood area, impacts upon the environment are considered to be minimal owing to the limited potential of future development set through its generally restrictive policies and absence of any allocations.
Requires / Does not require SEA	No	For the reasons set out above (and discussed in further detail within this report).



*SEA Screening Opinion Conclusion*

In accordance with the 'Strategic Environmental Assessment Directive' and the Environmental Assessment of Plans and Programmes Regulations (2004), the Borough Council is satisfied to conclude that through the information submitted by the SEA Screening Assessment (subject to the above suggested amendments) and the statutory body responses along with this Screening Opinion, the draft Winterton-on-Sea Neighbourhood Plan is **not likely to have significant environmental effects**. The main reasons for this conclusion are that the draft neighbourhood plan:

- largely conforms to the adopted Core Strategy
- is to operate at relatively small scales
- does not contain allocations
- offers limited opportunity for new development
- recognises its sensitive landscape and seeks to conserve and enhance its environmental assets.

The draft Winterton-on-Sea Neighbourhood Plan is therefore 'screened out'.



## HRA Screening Opinion

### *Introduction*

This screening opinion determines whether or not the draft Winterton-on-Sea Neighbourhood Plan (April, 2019) will have 'likely significant effects' upon internationally designated habitat sites (or Natura 2000 Sites). If 'likely significant effects' are established, an 'Appropriate Assessment' will need to be undertaken, this is usually incorporated into a 'Habitat Regulations Assessment' (HRA), in accordance with the [Conservation of Habitats and Species Regulations 2017](#).

### *Submitted HRA Screening Assessment*

The Borough Council has assessed the HRA screening report in consultation with Natural England. While the designated plan area does include Winterton-Horsey Dunes Special Area of Conservation (SAC), the draft neighbourhood plan does not allocate any sites for development, and sets out a generally restrictive approach to development. Many of the policies seek to conserve and enhance the natural environment. The aim of the parking policy appears to be to reduce the level of on-street parking within the historic centre of the village, this is therefore unlikely to result in additional spaces for visitors. In this context the plan is unlikely to present additional residential or recreational disturbance beyond that identified in the Borough Council's Local Plan Core Strategy.

It is, however, recommended that a number of amendments are incorporated into the submitted HRA Screening Assessment:

- Figure 1, Update Neighbourhood Area Designation Map (including The Broads Area)
- Figure 2 –
  - Winterton-Horsey Dunes SAC & SSSI – the plan will have negligible additional recreational pressures
  - National Parks – The Broads Area has equivalent status to national parks [see NPPF paragraph 172]
  - Conservation Areas – there are 2 areas within the Neighbourhood Plan area, the plan from the Council's website can be accessed [here](#)
  - Flood Risk – There are areas of higher flood risk, particularly in the north of the settlement, refer to the Borough Council's [Strategic Flood Risk Assessment](#) in addition to the Environment Agency's mapping; also ensure that all types of flood risk are assessed
- Figure 5 –
  - Typo – 'Breydon Water'
  - Should also include North Denes SPA & Southern North Sea SAC (marine site – as is Outer Thames Estuary and The Greater Wash)
- Figure 6 –
  - Affordable Housing & Tourist Accommodation – recommend rewording "...be of a local scale and potential effects will need to be assessed by site-specific HRAs identifying any necessary mitigation measures. The Borough Council has an adopted Habitats Monitoring and Mitigation Strategy and guidance to address in-combination effects from increased recreational disturbance at the site-specific level."



*HRA Screening Opinion Conclusion*

As Competent Authority and in accordance with the Conservation of Habitats and Species Regulations 2017, the Borough Council identifies **no ‘likely significant effects’** on nearby internationally protected wildlife sites (particularly Winterton-Horsey Dunes SAC) resulting from the draft Winterton Neighbourhood Plan either alone or in combination with other projects and programmes. No ‘appropriate assessment’ or full ‘Habitat Regulations Assessment’ is therefore required.

Note – Should the plan content change significantly from that of the April 2019 submitted draft, there may be potential for likely significant effects on the environment which have not been considered in this ‘Screening Opinion’, in such cases the neighbourhood plan may need to be re-screened by the Borough Council.



# Winterton-on-Sea Neighbourhood Plan

## Evidence Base Update January 2021

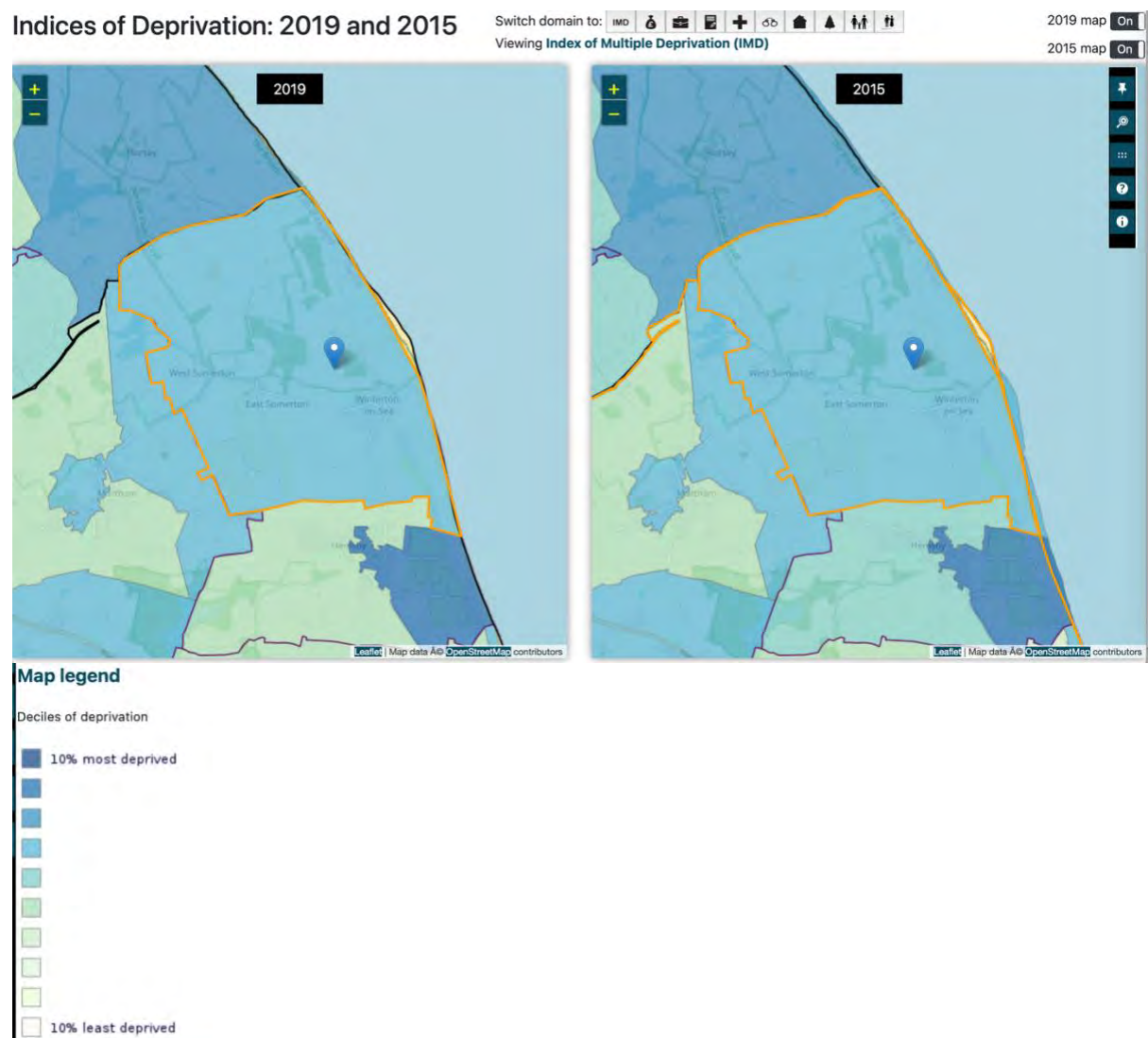
### Introduction

This document provides updated data and evidence in support of the Neighbourhood Plan. Where findings deviate from the original evidence presented in 2018 a review of the policies contained within the Neighbourhood Plan has been undertaken to understand the impact of this. Where required references to evidence within the plan have been updated.

### Index of Multiple Deprivation

Winterton-on-Sea is ranked 10,343 out of 32,844 Lower Super Output Areas in England; where 1 is the most deprived LSOA. This is amongst the 40% most deprived in the country. In 2015, the LSOA was ranked 10,874, so relatively it is in a similar though slightly more deprived position. In general deprivation is not likely to be an issue for the Neighbourhood Plan.

#### Indices of Deprivation: 2019 and 2015

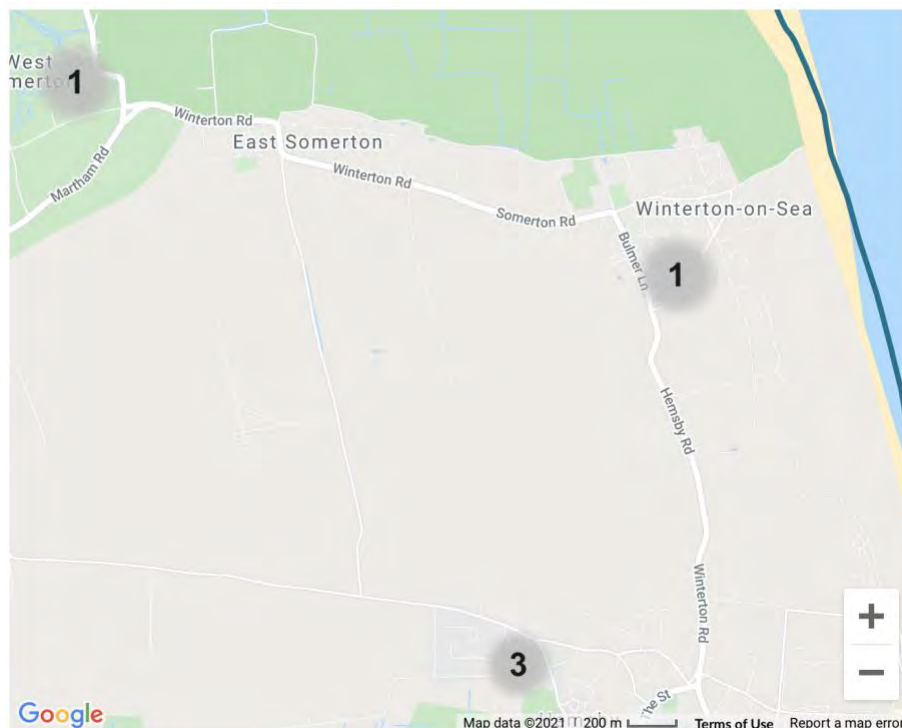




## Reported Crime

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Reported Crime remains low. As a snapshot, reported crimes in November 2020, the latest figure available, was just one.



Source: <https://www.police.uk/pu/your-area/norfolk-constabulary/rural-flegg-villages/?tab=CrimeMap>, November 2020, latest data

## Condition of Winterton-Horsey Dunes SSSI

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The condition of the Winterton-Horsey Dunes SSSI is reported annually in Great Yarmouth Borough Council's Annual Monitoring Report. The figure below reports the latest position, however, as noted in the Borough Council's report, Natural England have not assessed the Winterton-Horsey dunes since 2009. It is therefore likely that the condition has altered since the last assessment, and the figures below, which state that 67.92% of the SSSI is in favourable condition, should be taken as a baseline.



**Figure 25: Current recorded condition of the Borough's SSSI's**



Source: Great Yarmouth Annual Monitoring Report, 2019/20 [https://www.great-yarmouth.gov.uk/media/5943/Annual-Monitoring-Report/pdf/Annual Monitoring Report 2019-20.pdf](https://www.great-yarmouth.gov.uk/media/5943/Annual-Monitoring-Report/pdf/Annual%20Monitoring%20Report%202019-20.pdf)

## Flood Risk from Surface Water

Flood risk from surface water affects many parts of the village, including the historic centre, with a high-risk area concentrated along Black Street and The Lane. The map below is taken from the Environment Agency website, January 2021. This map is almost identical to that reported in the 2018 evidence base.



Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>



## Second and Holiday Homes Winterton-on-Sea Evidence Base

### Introduction

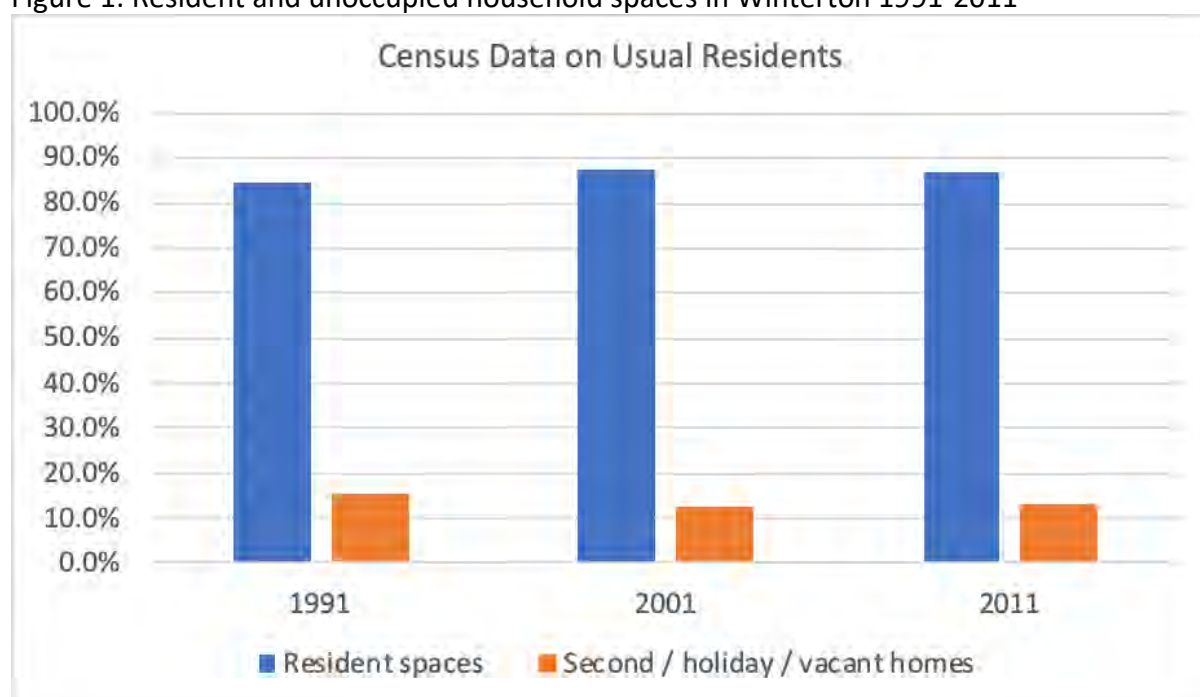
This supplementary evidence note is intended to support Policy HO4 Principle Residence Housing in Winterton-on-Sea's Neighbourhood Plan. It provides local evidence on the prevalence of holiday lets and second homes within the parish and the perceived impacts of this by residents.

The National Planning Policy Framework does not make any allowance for the impact of second homes or holiday homes in a local authority's housing target. Additionally, whilst every effort is made to reduce the number of empty properties there are in the community and bring them back into use, no such device exists for second homes.

As demonstrated by St Ives, Cornwall, it is possible to include a non-strategic policy in the Neighbourhood Plan to address this, where there is sufficient evidence to support its inclusion.

### Data on Holiday Lets / Second Homes

Figure 1: Resident and unoccupied household spaces in Winterton 1991-2011



*Note that the data above for 1991 is for the Ward of Winterton and Somerton so is over a larger area.*

Census data indicates that in 2011 just over 13% of homes in Winterton-on-Sea were unoccupied at the time of the Census. This is a slight increase from 2001, over which period there was a 7% increase in the number of households. The majority of unoccupied homes will be second and holiday homes rather than empty properties.



## **Second and Holiday Homes Winterton-on-Sea Evidence Base**

The main Evidence Base which accompanies the Neighbourhood Plan compares the level of second/holiday/vacant homes with that of nearby communities, providing the following chart:

**Figure 2: Comparison of Winterton with nearby coastal communities**

<b>Community</b>	<b>Household spaces (Census 2011)</b>	<b>Proportion with no usual residents (indicator of holiday lets)</b>
Winterton-on-Sea	674	13%
Happisburgh	1308	17%
Bacton	653	19%
Sea Palling	380	23%
Great Yarmouth		5%
National		4%

This suggests that Winterton-on-Sea has lower levels than other communities along the Norfolk Coastline, though they remain higher than the borough or national picture. These figures were discussed with the Neighbourhood Plan group and it was suggested that the proportion of holiday and second homes had increased significantly over the last 8/9 years since the 2011 Census.

Research locally, through local insight as well as online accommodation sites, indicates that the highest concentration of second / holiday homes is on The Lane, King Street and North Market Road. On these roads the number of second / holiday homes outnumbers permanent residents. These streets are all located within the village centre. Appendix A provides a map of known holiday homes within the village, as taken from publicly available sources, it highlights the location of 67 homes in the village. This does not include second / holiday homes in The Lighthouse Field at Hermanus or properties on Winterton Valley Estate.

Another measure to consider is Council Tax records. Data received from Great Yarmouth Borough Council indicates that around a third of homes are second / holiday homes. This includes the holiday units at Hermanus and Winterton Valley Estate so is not exclusively restricted to dwellings.

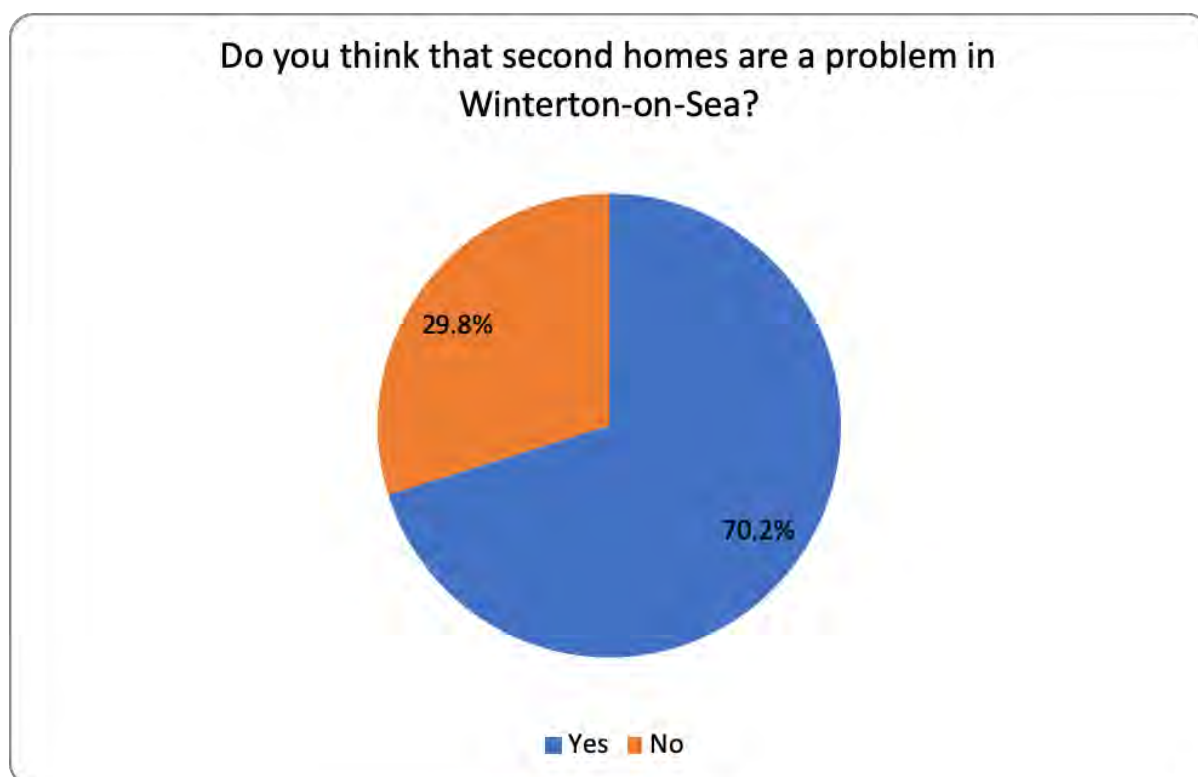
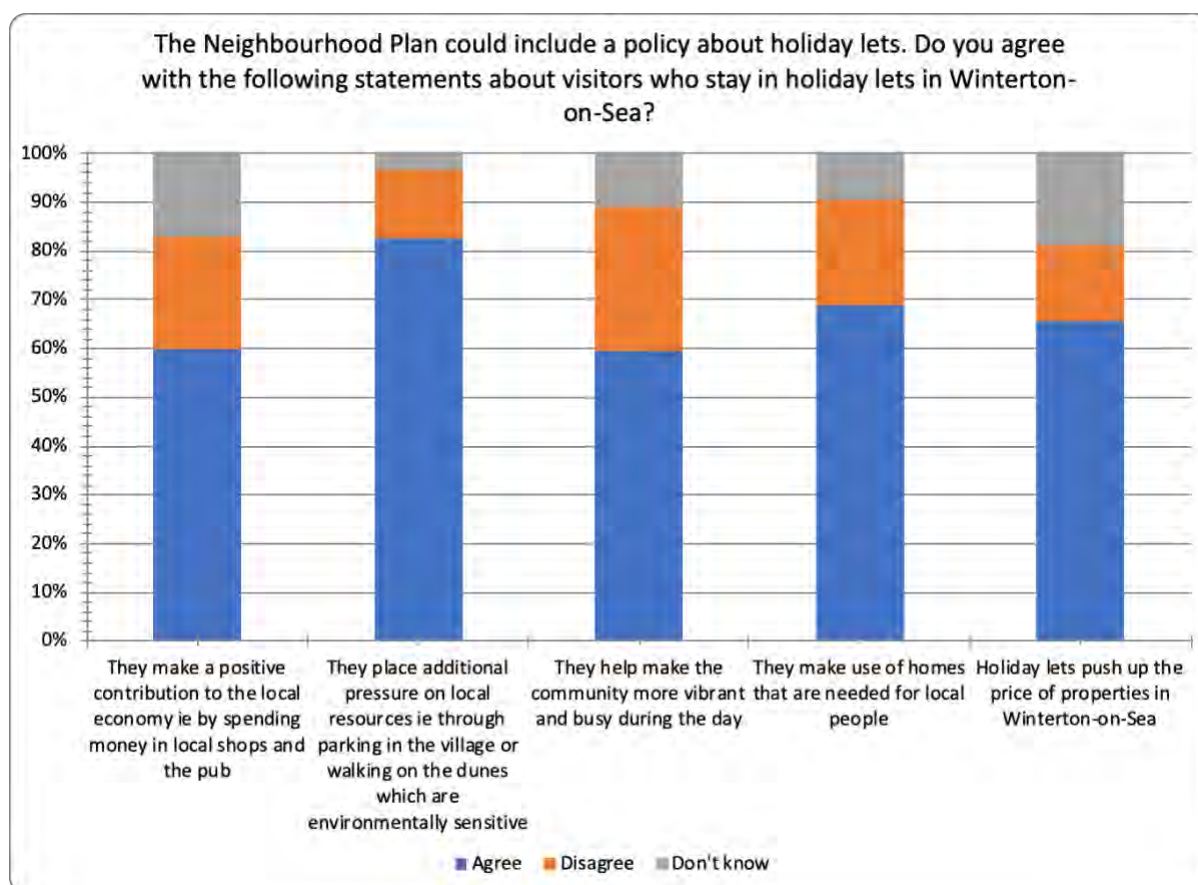
The data suggests that Winterton-on-Sea is an area in which potential second home owners compete with other home buyers to purchase available housing. Potential second home owners may be more successful as they can afford the high prices expected by sellers and generally have more disposable income than local residents.

### **The impact of Second / Holiday homes**

The decision was made to ask residents during the Issues and Options Consultation in November 2018 for their views on the impact that second / holiday homes had in the village. Key findings from this are presented below.



## Second and Holiday Homes Winterton-on-Sea Evidence Base





## **Second and Holiday Homes Winterton-on-Sea Evidence Base**

Respondents were asked to provide their views on second / holiday homes, analysis of this is provided below.

- Second homes are usually empty in the winter months and are perceived as taking homes from local people (20)
- The village needs a core of permanent residents, including families, to thrive all year round (15)
- Local people are now priced out the market (9)
- There are issues with antisocial behaviour such as noise, vandalism and parking across other people's driveways (9)
- Holidaymakers and second home owners generate spend in the village (6)
- The balance of holiday lets / second homes and properties with permanent residents is too far in the direction of holiday lets (6)
- Winterton is becoming a retirement village, which is more of an issue (5)
- There's a lack of spend locally (3)
- There's a good balance locally at the moment (2)
- Restricting further second homes / holiday lets would not necessarily mean more affordable homes in the village (1)

Overall there were 65 responses to the survey, of which 97% were residents of the village.

### **Conclusions**

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Evidence indicates that the percentage of households with no usual residents in Winterton-on-Sea is markedly greater than across the borough or county as a whole. Council Tax data, which is more recent than Census data on usual residents, suggests that the proportion of second home ownership overall is near to a third of all properties in the parish. Local research indicates that the highest concentrations of second or holiday homes is in the village centre, on The Lane, King Street and Beach Road, where they outnumber dwellings occupied by permanent residents.

Feedback from the community shows that the socio-economic effects second and holiday homes are being felt by local residents. The increase in second home owners has, it is widely reported, resulted in rising property prices, which has put homes in the parish beyond the reach of young families and local people wishing to join the property ladder for the first time. This threatens the long-term viability and vitality of the village as a sustainable year-round community. In 2018 the village almost lost its local primary school due to the gradual decline in numbers of children on roll. This is in part due to the decline in families with young children living in the community. Other reported impacts include some residents feeling isolated as they have few permanent neighbours, especially in the winter months, and that this can harm community cohesion. This perhaps is mostly related to second home ownership rather than holiday lets as the tourist economy in Winterton increasingly operates year-round. Other impacts are reported, such as less maintenance, including gardening, being carried out on second homes occupied only intermittently, and this can harm the street-scene and overall character.



## **Second and Holiday Homes Winterton-on-Sea Evidence Base**

The data suggests that Winterton-on-Sea is an area in which potential second home owners compete with other home buyers to purchase available housing. Potential second home owners may be more successful as they can afford the high prices expected by sellers and generally have more disposable income than local residents. Although housing development in Winterton-on-Sea is likely to be limited, a policy intervention restricting new homes to principal residents would ensure any new homes are available for people who wish to live locally within the parish.

### **Definitions**

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**Census data:** A household space is the accommodation used or available for use by an individual household. Household spaces are identified separately in census results as those with at least one usual resident, and those that do not have any usual residents. A household space with no usual residents may still be used by short-term residents, visitors who were present on census night, or a combination of short-term residents and visitors. Vacant household spaces, and household spaces that are used as second addresses, are also classified in census results as 'household spaces with no usual residents'.

**Council Tax:** Most dwellings have a liability to pay Council Tax and a bill is issued for each dwelling, irrelevant of ownership or rental of the property.

**Business Rates:** This is the commonly used term for non-domestic rates that are charged on most non-domestic premises, including commercial properties such as shops, self-catering units, offices, pubs, warehouses and factories.



## Second and Holiday Homes Winterton-on-Sea Evidence Base

### Appendix A: Holiday Homes (September 2020, from publicly available sources)





**Second and Holiday Homes  
Winterton-on-Sea Evidence Base**

*Holiday Homes in Winterton-on-Sea*

- 1 = Carothan (sleeps 4), Somerton Road
- 2 = Church Farm (sleeps 16), Black Street
- 3-7 = Bobtail Cottage (sleeps 4), Natterjack (sleeps 4), Herring House (sleeps 6), Little Tern Cottage (sleeps 6), Marram House (?) - Church Farm Barns
- 8 = Castaway (sleeps 4), Back Path
- 9 = Little Tern Cottage (sleeps 4), North Market Road
- 10 = Swallowtail Cottage (sleeps 6), North Market Road
- 11 = Hideaway (sleeps 6), Larners Loke
- 12 -15 = Samphire, Sedge, Pinrush & The Farmhouse, Low Farm Barns, Low Road
- 16 = Sam's Snug (sleeps 4), Bulmer Lane
- 17 = Lavender Cottage (sleeps 6), Bulmer Lane
- 18 = The Hay Barn (sleeps 2), Hemsby Road
- 19 = Mill Farm Eco Barn (sleeps 8), Hemsby Road
- 20 = Poppylands (sleeps 5), Bush Road
- 21 = Rosehearty (sleeps 6), Bush Road
- 22 = Drifters (sleeps 8), Bush Road
- 23 = Sea Star (sleeps 10), Bush Road
- 24 = Eva's Lookout (sleeps 8), Bush Road
- 25 = Sea Clef (sleeps 6?), Bush Road
- 26 = Bonnets (sleeps 4), Bush Road
- 27 = Winterton Lighthouse (sleeps 7), The Holway
- 28 = Sunny View (sleeps 6), The Craft
- 29 = Cobbles End (sleeps 4), Winmer Avenue
- 30 = The Cranny (sleeps 4), King Street
- 31 = April Cottage (sleeps 4), King Street
- 32 = Ship's Timbers (sleeps 2), King Street
- 33 = Ostlers Cottage (sleeps 6), King Street
- 34 = Ruby Gem (sleeps 4), King Street
- 35 = Admiral Cottage (sleeps 4), King Street
- 36 = Beach Cottage (sleeps 4), King Street
- 37 = Moonfleet House (sleeps 8), Beach Road
- 38 = Hidden Gem (sleeps 4?), May Cottages
- 39 = Snowdrop Cottage (sleeps 4), Old Chapel Road
- 40 = Dune Vista (sleeps 5), Old Chapel Road



Second and Holiday Homes  
Winterton-on-Sea Evidence Base

## *Holiday Homes in Winterton-on-Sea*

- 41 = Beachcomber (sleeps 6), Miriam Terrace, North Market Road
- 42 = Seahorse Cottage (sleeps 6), Miriam Terrace, North Market Road
- 43 = Miriam Cottage (sleeps 6), Miriam Terrace, North Market Road
- 44 = Hillside Cottage (sleeps 5), North Market Road
- 45 = Net House (sleeps 4), North Market Road
- 46 = Lazy Days (sleeps 6), Black Street
- 47 = Eastwyn (sleeps 5), Black Street
- 48 = Prospect Cottage (sleeps 4/5), Prospect Place
- 49 = Juanperi (sleeps 5), Prospect Place
- 50 = Cushty Cottage (sleeps 6), Prospect Place
- 51 = ? (sleeps 4/5), Prospect Place
- 52 = Castaway (sleeps 4), Back Path
- 53 = Cleveland House (sleeps 10), The Lane
- 54 = Periwinkle Cottage (sleeps 8), The Lane
- 55 = Sea Holly Cottage (sleeps 7), The Lane
- 56 = Captain's Cottage (sleeps 6), The Lane
- 57 = Ketch Cottage (sleeps 4), The Lane
- 58 = Harbour Cottage (sleeps 4), The Lane
- 59 = Compass Cottage (sleeps 4), The Lane
- 60 = Starboard Cottage (sleeps 6), The Lane
- 61 = Skipper's Lodge (sleeps 4), The Lane
- 62 = Henry's Cottage (sleeps 4), Pratt's Buildings, King Street
- 63 = Isabels Cottage (sleeps 4?), Pratt's Buildings, King Street
- 64 = Sevena Cottage (sleeps 5/6?), Sevena Cottages, King Street
- 65 = Captain's Nook (sleeps 6), Coastguard Cottages, King Street
- 66 = Beachside (sleeps 4), King Street
- 67 = Winterton Hall (sleeps 2?), Winterton

Sources:

[airbnb.co.uk](https://www.airbnb.co.uk)

[homeaway.co.uk](https://www.homeaway.co.uk)

[holidaylettings.co.uk](https://www.holidaylettings.co.uk)

[wintertoncottages.co.uk](https://www.wintertoncottages.co.uk)

[packholidays.co.uk](https://www.packholidays.co.uk)

[eastrustoncottages.co.uk](https://www.eastrustoncottages.co.uk)

[visitwinterton.co.uk](https://www.visitwinterton.co.uk)

[holidaycottages.co.uk](https://www.holidaycottages.co.uk)

[cottages.com](https://www.cottages.com)



# Planning Committee

05 March 2021

Agenda item number 16

## Consultation Responses

Report by Planning Policy Officer

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### 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.

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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 comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 22 February 2021

Appendix 1 – Planning Policy consultations received



# Appendix 1 – Planning Policy consultations received

**Organisation:** Greater Norwich Authorities

**Document:** [www.gnlp.org.uk](http://www.gnlp.org.uk)

**Due date:** 15 March 2021

**Status:** Regulation 19 – pre-submission

**Proposed level:** Planning Committee Endorsed

## Notes

This stage of consultation is prior to the Greater Norwich Authorities submitting the Local Plan for examination by an independent Planning Inspector.

This is the Publication draft version of the Greater Norwich Local Plan (GNLP), also called the Regulation 19 Pre-Submission Draft Plan. There are two parts to the plan, the first is the Publication draft GNLP Strategy which contains the planning strategy for growth in Greater Norwich from 2018 to 2038 and the second is the Publication draft GNLP Sites document which contains allocation policies for the sites to deliver the strategy. The plan is supported by a Sustainability Appraisal and other background evidence. The GNLP will supersede the current Joint Core Strategy for Greater Norwich and the Site Allocation Plans in each of the three districts.

Members will recall that Mike Burrell from the Greater Norwich Local Plan Team presented to February Planning Committee on the subject of this version of the Greater Norwich Local Plan.

## Proposed response

### Summary for Members

Whilst the consultation notice says “the publication period allows for any concerns to be formally raised as a ‘representation’ regarding the soundness or legal compliance of the GN Local Plan”, following discussions with members of the Greater Norwich Local Plan Team, our approach will be to make the comments and seek changes as additional modifications. We will therefore not raise soundness issues with the Local Plan. This is because, in relation to this particular Local Plan, the changes we are seeking will add clarity and context and ensure better consistency – they are not necessarily fundamental changes that affect a policy, although we consider them still important comments. We consider that these changes could be made as additional modifications, rather than main modifications (which tend to be changes that are more significant and fundamental to a plan). We have asked for confirmation about this approach. As the examination progresses, we will monitor it to see how our comments are taken forward.

### Start of proposed response

Thank you for consulting the Broads Authority. We have a number of comments and observations. We do not think they are soundness issues, but the changes are needed, in our opinion, to make the plan better, clearer and more consistent. We believe they can be



addressed as additional modifications. As such, we have not completed the form as we are not raising soundness objections. If you can please confirm or advise on your approach to addressing our comments that would be welcomed. Perhaps we need to come up with a statement of common ground when the examination is underway?

#### Comments on Strategy document

##### **Main points**

The following points are quite important, but are not soundness issues. They do not affect the soundness of the Local Plan. They can however be easily added to the Local Plan to provide context, especially given the stance in the Plan that the sites in East Norwich are seen as one, including the part in the Broads. Other comments would aid clarity. These comments could be addressed as additional modifications.

- Policy 3
  - The Built and Historic Environment – first bullet point – it states developers should be ‘undertaking a heritage impact assessment if significant impacts might arise’ – government guidance states that this is required for any application that affects any heritage asset or their setting – including locally identified heritage assets. Is the wording therefore needed and if so does it need re-wording?
  - Policy 3 second bullet point – ‘public benefits’ might be better wording than ‘benefits’. Should this be re-worded to put the emphasis on avoiding harm to Heritage assets?
  - Policy 3 - The Built and Historic Environment – last sentence states ‘importance of the heritage asset’, for the sake of consistency of terminology would ‘significance of the heritage asset’, as per the NPPF, be better?
  - Policy 3 – Natural Environment – first para – it states ‘ancient trees and woodland’ should be protected. Could this be broadened out to include other trees which contribute greatly to our settlements and green spaces?
- The map on page 100 needs to show the part of the utilities site in the Broads. The preceding text talks about looking at the area as a whole, yet misses the bit of the Utilities Site that is in the Broads.
- Policy 7.1, page 105, there needs to be some acknowledgement in this policy, even if it is a footnote, to say that part of the Utilities site is in the Broads and that the entire area is being considered together, regardless of local planning authority administration boundaries.
- Para 205 – ‘*The strategic approach to heritage is first to consider the potential location of development, for example does the location itself “fit” well in relation to adjoining settlements*’. We are not entirely clear what this means. Does it mean that new development should relate well to its historic context?



- Para 205 - goes on to state that development should avoid intruding into important views of historic assets. Historic England guidance on the Setting of Historic assets ([The Setting of Heritage Assets \(historicengland.org.uk\)](https://historicengland.org.uk)) and numerous appeal decisions make clear that the setting of a heritage asset is much greater than views and it is the setting of heritage assets that need to be considered not specific views.
- Para 205 - Also 'historic assets' is used – should the term be heritage assets to ensure it correlates with the terminology defined in the NPPF?
- Para 207 – should this state 'public benefits' not just benefits?
- Para 207 – This paragraph recognises that in certain circumstances a balance will need to be struck between development and protection and this recognition is useful. It might be helpful if this section was weighted more towards protection of the historic environment, taking a precautionary approach. The NPPF states that substantial harm to grade II listed HAs should be exceptional and to SAMs or grade II\* / grade I HAS should be wholly exceptional (para 194). Equally para 195 of the NPPF states applications should be *refused* where a proposal will lead to substantial harm unless there are substantial public benefits that outweigh that loss or *all* of 4 tests can be met.

The reason for the following is not explained and is different to the NPPF. Depending on what is meant, it could affect the setting of the Broads. We would welcome some explanation around the wording used and also its justification.

- Policy 7.4, page 117 seems to imply that rural exception sites or entry level exception sites can be 'well related' to settlement boundaries. The NPPF says that such sites should be adjacent. Why is this approach being changed? It does not seem to be explained anywhere in the document. What is well related as well? How far from a settlement boundary can a development be? Depending on what is meant, this could affect the setting of the Broads and we may strengthen the status of our comment later in the examination process. Perhaps of relevance are the changes to the NPPF that are proposed to the current paragraph 172, proposed paragraph 175: 'The scale and extent of development within these designated areas should be limited, while any development within their settings should be sensitively located and designed to avoid adverse impacts on the designated landscapes'.

The following points are not soundness issues, but the plan could easily be amended to include them. It seems logical to address these comments as additional modifications. They provide clarity and context and further useful information.

- Policy 2, bullet 5 – would welcome, perhaps in a footnote, reference to the landscape character assessment for the Broads, so it is clear that our LCA might be of relevance as well.
- Policy 7.1, page 106, last bullet point – you might want to have a footnote that refers to the local plan for the Broads and our policies on navigation.



### Minor comments

Minor points for you to consider. These could aid clarity. They could be additional modifications.

- 10.3 – should this also refer to off shore wind's on-shore infrastructure?

### Typo and grammatical errors

Typos and grammatical errors for you to consider

- Page 105: Development of sites allocated in the East Norwich strategic regeneration area identified on the Key Diagram and defined on map 9 including Carrow Works, the Deal Ground and the Utilities Site will create a highly sustainable mixed-use gateway quarter accommodating substantial housing growth and optimising economic benefits. Development across the sites will provide in the region of 4,000 additional homes in the plan period and significant new employment opportunities for around 6,000 jobs. East Norwich also has the potential to act as a long-term catalyst for regeneration of the wider area, potentially including the following sites if they become available:
- Page 106: • creating an inclusive, resilient and safe community in which people of all ages have good access to high quality homes that meet housing needs, the provision of area-wide economic and social infrastructure and services, including (but not limited to) the creation of new employment opportunities, a new local centre, and a new primary school should need to be established'.

### Comments on the sites document

The following points are quite important, but are not soundness issues. They do not affect the soundness of the Local Plan. They can however be easily added to the Local Plan to provide context. Other comments would aid clarity. These comments could be addressed as additional modifications.

- Throughout the various parts - as this is a planning document, no need to say 'National Park'. Just say 'the Broads'. There are many occurrences, so perhaps search for the term.
- It would be useful if all of the site allocation plans had street names on – the required standard for most planning applications is at least two street names.
- We note there is no mention of dark skies or limiting light pollution in the policies. The Broads has intrinsically dark skies, as can be seen at this map. We therefore recommend that wording could be added.

### Norwich sites

The following comments are factual, observations, seek clarity, seek consistency or are typographical or grammatical. They are not soundness issues, but the comments could be addressed as additional modifications.

### Observation:

As a matter of consistency. We note that para 2.198 says this 'Given the site's highly



accessible location and the intention to provide new public transport links it is considered suitable to include car-free housing. In any event car parking levels should be kept low'. We note that other sites may say that the site is considered suitable for car free housing, but the wording in those instances does not go on to talk about the last part – car parking levels should be kept low. You may want to check to see if this wording is needed for other allocations.

### **0360/3053/R10**

#### **Main points**

- Map page 15, this needs to show the part of the utilities site that is in the Broads. This does not affect the soundness of the Local Plan. It could, however, be easily added to the Local Plan to provide context, especially given the stance in the Plan that the sites in East Norwich are seen as one, including the part in the Broads.
- We request that wording like that at 2.134 is included in the supporting text for CC4b. '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

#### **Minor points**

- Page 12, point 6 of policy. Typographical/grammatical error: 'heritage assets affected by the proposal on and off site including key views from and into the site'.
- Page 12, point 8 of policy – something to consider. You may wish consider biodiversity on this brownfield land that may establish or has been established over the years. Open mosaic habitat of intrinsic biodiversity value is a NERC Act habitat. Brownfield sites are listed as a Priority Habitat in Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act), as 'open mosaic habitat on previously developed land'. For more information go here [www.buglife.org.uk/sites/default/files/Identifying%20open%20mosaic%20habitat.pdf](http://www.buglife.org.uk/sites/default/files/Identifying%20open%20mosaic%20habitat.pdf) and here [jncc.defra.gov.uk/pdf/UKBAP\\_BAPHabitats-40-OMH-2010.pdf](http://jncc.defra.gov.uk/pdf/UKBAP_BAPHabitats-40-OMH-2010.pdf)

### **0068**

#### **Main points**

- As part of point 1, refer to the scheme making the most of its riverside location, as is stated in other policies. This is a matter of consistency. 0401 and GNLPO409AR for example have good wording in point 1 that can be used. It is not clear why this wording is in most, if not all other river side policies and not this one. This may simply be a drafting error. This would make the plan consistent.
- 2.30 – support the fact that early engagement with us is recommended, but not clear why the only reason is flood risk. Or does that part of the sentence only refer to AWS?



It may need clarifying that in general, given its location, early engagement with the Broads Authority is recommended, rather than just saying to do with flood risk.

#### Minor points

- Typographical/grammatical error: 'Missing full stop:(or if developed for student accommodation, a minimum of 125 student bedrooms). A small element of commercial, office, and/or educational use at ground floor level may also be acceptable'.

#### **0401**

##### Main point

- We request that wording like that at 2.134 is included in the supporting text for CC4b. '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

##### Minor point

- Typographical/grammatical error: 2.51: 'The site is likely to accommodate at least 100 homes, or if the site is developed to include student accommodation (at least 250 bedrooms)'. Suggest removing brackets as the sentence is not really reading well or right as drafted.

#### **Cc4b**

##### Main point

- We request that wording like that at 2.134 is included in the supporting text for CC4b. '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

##### Minor point

- Typographical/grammatical error: 2.121: 'Development of site CC4a should explore continued use/re-provision of the existing community garden facility'.

#### **Cc7**

##### Main point:

- 2.131: the trees seem to be in the Conservation Area and so have some protection. You might want to refer to that.



## CC16

### Main point

- 2.203 – we request that this is worded like 2.134 as follows: ‘2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority’. At the moment, what is worded only refers to the EA. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

### Minor point

- Does not mention about making most of riverside location in supporting text like other policies. The actual policy does. You may wish to add something to the supporting text to be consistent.

### Urban fringe

The following comment is factual. It is not a soundness issue, but it seems logical to address these comments as additional modifications.

### Factual update

- Para 3.75 – last sentence, amend as follows ‘the Church of St Andrew **and its ruins**’ – as both the church and ruins are listed.

### Key service centres

The following comment seeks to improve context. It is not a soundness issue, but it seems logical to address these comments as additional modifications.

### Main point:

- GNLP0378R/GNLP2139R, GNLP0312 and para 5.42 – please also mention dark skies of the Broads. The Broads has intrinsically dark skies. You mention the setting of the Broads, which is welcomed, but please add reference to protecting the dark skies of the Broads.

### Broadland villages

The following comments are factual, observations, seek clarity, seek consistency. They are not soundness issues, but it seems logical to address these comments as additional modifications.

### Main points:

- Cantley map, page 15 – show the Broads for consistency and to show the context.
- Horstead and Coltishall map, page 25 – show the Broads for consistency and to show the context.
- GNLP1001 – please also mention dark skies of the Broads. The Broads has intrinsically dark skies. You mention the setting of the Broads, which is welcomed, but please add reference to protecting the dark skies of the Broads.



- Coltishall, Horstead and Belaugh – should the Conservation Areas that covers parts of all three of these villages be mentioned in the text?
- Salhouse – again should the Conservation Area be mentioned – potential for limited impact on the wider setting of the CA at the site allocated in Salhouse.



# Planning Committee

05 March 2021

Agenda item number 17

## Circular 28 83 Publication by Local Authorities of Information about the handling of planning applications

Report by Planning Technical Support Officer

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### Summary

This report sets out the development control statistics for the quarter ending 31 December 2020

### Recommendation

To note the report.

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## 1. Development control statistics

- 1.1. The development control statistics for the quarter ending are summarised in the tables below.

**Table 1**

Number of applications

Category	Number of applications
Total number of applications determined	40
Number of delegated decisions	40
Numbers granted	40
Number refused	0
Number of Enforcement Notices	2
Consultations received from Neighbouring Authorities	15



**Table 2**

Speed of decision

Speed of decision	Number	Percentage of applications
Under 8 weeks	33	82.5
8-13 weeks	0	0
13-16 weeks	0	0
16-26 weeks	0	0
26-52 weeks	0	0
Over 52 weeks	0	0
Agreed Extension	7	17.5

**Table 3**

National performance indicators: BV 109 The percentage of planning applications determined in line with development control targets to determine planning applications.

National target	Actual
60% of Major applications <sup>1</sup> in 13 weeks (or within agreed extension of time)	N/A
65% of Minor applications <sup>2</sup> in 8 weeks (or within agreed extension of time)	100%
80% of other applications <sup>3</sup> in 8 weeks (or within agreed extension of time)	100%

Author: Thomas Carter

Date of report: 22 February 2021

Appendix 1 – PS1 returns

Appendix 2 – PS2 returns

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<sup>1</sup> Majors refers to any application for development where the site area is over 1000m<sup>2</sup>

<sup>2</sup> Minor refers to any application for development where the site area is under 1000m<sup>2</sup> (not including Household/ Listed Buildings/Changes of Use etc.)

<sup>3</sup> Other refers to all other applications types



## Appendix 1 – PS1 returns

Measure	Description	Number of applications
1.1	On hand at beginning of quarter	32
1.2	Received during quarter	59
1.3	Withdrawn, called in or turned away during quarter	0
1.4	On hand at end of quarter	51
2.	Number of planning applications determined during quarter	40
3.	Number of delegated decisions	40
4.	Number of statutory Environmental Statements received with planning applications	0
5.1	Number of deemed permissions granted by the authority under regulation 3 of the Town and Country Planning General Regulations 1992	0
5.2	Number of deemed permissions granted by the authority under regulation 4 of the Town and Country Planning General Regulations 1992	0
6.1	Number of determinations applications received	0
6.2	Number of decisions taken to intervene on determinations applications	0
7.1	Number of enforcement notices issued	0
7.2	Number of stop notices served	0
7.3	Number of temporary stop notices served	0
7.4	Number of planning contravention notices served	2
7.5	Number of breach of conditions notices served	0
7.6	Number of enforcement injunctions granted by High Court or County Court	0
7.7	Number of injunctive applications raised by High Court or County Court	0



## Appendix 2 – PS2 returns

**Table 1**

Major applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	0	0	0	0	0	0	0	0	0	0
Offices/ Light Industry	0	0	0	0	0	0	0	0	0	0
Heavy Industry/Storage/Warehousing	0	0	0	0	0	0	0	0	0	0
Retail Distribution and Servicing	0	0	0	0	0	0	0	0	0	0
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Large-Scale Major Developments	0	0	0	0	0	0	0	0	0	0
<b>Total major applications</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>



**Table 2**

Minor applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	1	1	0	0	0	0	0	0	0	1
Offices/Light Industry	1	1	0	1	0	0	0	0	0	0
General Industry/Storage/Warehousing	2	2	0	2	0	0	0	0	0	0
Retail Distribution and Servicing	0	0	0	0	0	0	0	0	0	0
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Minor Developments	10	10	0	7	0	0	0	0	0	3
<b>Minor applications total</b>	<b>14</b>	<b>14</b>	<b>0</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>



**Table 3**

Other applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Minerals	0	0	0	0	0	0	0	0	0	0
Change of Use	1	1	0	0	0	0	0	0	0	1
Householder Developments	23	23	0	21	0	0	0	0	0	2
Advertisements	0	0	0	0	0	0	0	0	0	0
Listed Building Consent to Alter/Extend	2	2	0	2	0	0	0	0	0	0
Listed Building Consent to Demolish	0	0	0	0	0	0	0	0	0	0
Certificates of Lawful Development <sup>4</sup>	0	0	0	0	0	0	0	0	0	0
Notifications <sup>4</sup>	1	1	0	0	1	0	0	0	0	0
<b>Other applications total</b>	<b>27</b>	<b>27</b>	<b>0</b>	<b>23</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>

<sup>4</sup> Applications for Lawful Development Certificates and Notifications are not counted in the statistics report for planning applications. As a result, these figures are not included in the total row in Table 4.



**Table 4**

Totals by application category

<b>Application type</b>	<b>Total</b>	<b>Granted</b>	<b>Refused</b>	<b>8 weeks or less</b>	<b>More than 8 and up to 13 weeks</b>	<b>More than 13 and up to 16 weeks</b>	<b>More than 16 and up to 26 weeks</b>	<b>More than 26 and up to 52 weeks</b>	<b>More than 52 weeks</b>	<b>Within agreed extension of time</b>
Major applications	0	0	0	0	0	0	0	0	0	0
Minor applications total	14	14	0	10	0	0	0	0	0	4
Other applications total	26	26	0	23	0	0	0	0	0	3
<b>TOTAL</b>	<b>40</b>	<b>40</b>	<b>0</b>	<b>33</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>
<b>Percentage (%)</b>		<b>100</b>	<b>0</b>	<b>82.5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>17.5</b>



# Planning Committee

05 March 2021

Agenda item number 18

## Appeals to the Secretary of State update- 5 March 2021

Report by Senior Planning Officer

### Summary

This report sets out the position regarding appeals against the Authority.

### Recommendation

To note the report.

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
<b>APP/E9505/C/20/3245609</b>	Larry Rooney	Appeal submitted 26 January 2020 Request for Hearing  Start date 17 August 2020	Black Gate Farm, Cobholm, Great Yarmouth NR31 0DL	Appeal against Enforcement Notice: Change of use and standing of seven caravans for residential use	Committee decision 8 November 2019  Statement submitted 12 October 2020  Hearing date 9 February 2021



Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
					<b>Hearing cancelled. Hearing rescheduled to 20 July 2021</b>
<b>APP/E9505/W/19/3240574 BA/2018/0012/CU</b>	Mr Gordon Hall	Appeal submitted 14 February 2020 Request for Hearing  Start date 26 May 2020	Barn Adjacent Barn Mead Cottages Church Loke Coltishall	Appeal against refusal of planning permission: Change of Use from B8 to residential dwelling and self contained annexe.	Delegated decision 15 April 2019  Statement submitted 30 June 2020.  Hearing date 2 February 2021  <b>Hearing cancelled. Hearing rescheduled to 27 April 2021</b>
<b>APP/E9505/D/20/3258679 BA/2020/0105/HOUSEH</b>	Mr N Hannant	Appeal submitted 2 September 2020  Start date 9 November 2020	Gunton Lodge Broadview Road Lowestoft	Appeal against refusal of planning permission: Second floor balcony.	Delegated decision 25 August 2020.  Questionnaire submitted 16 November 2020



Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
<b>APP/E9505/W/21/3267755 BA/2020/0138/FUL</b>	Mr K Wheeler	Appeal submitted 27 January 2021  Awaiting start date.	39 Riverside Estate Brundall	Appeal against conditions imposed: Occupation restriction	Delegated decision 7 August 2020
<b>APP/E9505/C/21/3269284 BA/2017/0035/UNAUP3</b>	Mr Henry Harvey	Appeal submitted 18 February 2021  Awaiting start date	Land east of Brograve Mill, Coast Road Waxham	Appeal against Enforcement Notice. Unauthorised excavation of scrape	Committee decision 8 January 2021

Author: Cheryl Peel

Date of report: 22 February 2021

Background papers: BA appeal and application files



# Planning Committee

05 March 2021

Agenda item number 19

## Decisions made by officers under delegated powers – March 2021

Report by Senior Planning Officer

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### Summary

This report sets out the delegated decisions made by officers on planning applications from 25 January 2021 to 19 February 2021 and Tree Preservation Orders confirmed within this period.

### Recommendation

To note the report.

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### Decisions made by officers under delegated powers

Parish	Application	Site	Applicant	Proposal	Decision
Beccles Town Council	BA/2020/0462/HOUSEH	44 Puddingmoor Beccles NR34 9PL	Mr & Mrs C Reeve	First floor extension above existing rear extension and additional single storey rear extension	Approve Subject to Conditions



Parish	Application	Site	Applicant	Proposal	Decision
Beccles Town Council	BA/2020/0431/LBC	Waveney House Hotel Puddingmoor Beccles Suffolk NR34 9PL	Waveney House Hotel	bedroom 12 - internal layout change	Approve Subject to Conditions
Brundall Parish Council	BA/2020/0460/COND	59 Riverside Estate Brundall Norwich Norfolk NR13 5PU	Mr Gary Fletcher	External material and design changes, variation of condition 2 of permission BA/2018/0420/FUL	Approve Subject to Conditions
Catfield Parish Council	BA/2020/0428/HOUSEH	Vine Cottage Staithe Road Catfield NR29 5BP	Mr Tony Tkaczuk	Replacement Garage / Cart Lodge Out-Building to Detached Bungalow	Approve Subject to Conditions
Coltishall Parish Council	BA/2020/0426/LBC	The Old Maltings 14 Anchor Street Coltishall Norwich NR12 7AQ	Mr D Smith	New door entry system controller / new external lights	Approve Subject to Conditions
Ellingham And Kirby Cane PC	BA/2020/0441/HOUSEH	1 Ivy Cottage Geldeston Road Ellingham Norfolk NR34 0HS	Mr Simon Whitlam	Erection of timber framed cart lodge	Approve Subject to Conditions
Horning Parish Council	BA/2020/0384/FUL	Boathouse Ferry Cott Lane Horning Norwich Norfolk NR12 8PP	Mr Geoffrey Harrison	Proposed replacement boathouse, boardwalk and mooring	Approve Subject to Conditions



Parish	Application	Site	Applicant	Proposal	Decision
Horning Parish Council	BA/2020/0404/HOUSEH	Daydreams Horning Reach Horning NR12 8JR	Mrs Caroline Cunningham	Retention of extended mooring cut and quay heading	Approve Subject to Conditions
Ludham Parish Council	BA/2020/0452/HOUSEH	Ludham Manor Staithe Road Ludham Norfolk NR29 5AB	Mr George Mathieson	Sunroom extension & alterations to north elevation	Approve Subject to Conditions
Neatishead Parish Council	BA/2020/0453/FUL	Ye Olde Saddlery The Street Neatishead NR12 8AD	Mr & Mrs Thompson	Change of use of outbuilding to cafe (Class E(b)) & pizza takeaway (Sui Generis)	Refuse
Neatishead Parish Council	BA/2020/0420/HOUSEH	Mashobra Irstead Road Neatishead Norfolk NR12 8BJ	Ms Alex Craker	New dormer window & oriel window to accommodate lift & wheelchair accessible bathroom	Approve Subject to Conditions
Neatishead Parish Council	BA/2020/0449/HOUSEH	Ye Olde Saddlery The Street Neatishead NR12 8AD	Mr & Mrs Thompson	Erection of outbuilding in rear garden (retrospective)	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2020/0424/HOUSEH	Broads Retreat Borrow Road Lowestoft NR32 3PW	Mr Luke Smith	Replace timber quay heading with steel piles, timber capping & waling	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2020/0422/FUL	North Bay House Borrow Road Lowestoft NR32 3PW	HELLENDOORN	Single storey flat roof extension for equipment store	Approve Subject to Conditions



Parish	Application	Site	Applicant	Proposal	Decision
Thurne Parish Council	BA/2020/0284/REM	Hedera House The Street Thurne Norfolk NR29 3AP	Carol Delf	Reserved Matters application for appearance, design and landscaping/boundary treatment only following outline approval on pp BA/2017/0487/COND.	Approve Subject to Conditions
Wroxham Parish Council	BA/2020/0423/HOUSEH	The Summerhouse Beech Road Wroxham Norwich NR12 8TP	Mr & Mrs Emma Elbourne	Installation of a gate & fence	Approve Subject to Conditions

### Tree Preservation Orders confirmed by officers under delegated powers

Parish	Address	Reference number	Description
N/A	N/A	N/A	N/A

Author: Cheryl Peel

Date of report: 22 February 2021