

Planning Committee

06 March 2020

Agenda item number 14

Consultation documents and proposed responses: Rollesby Neighbourhood Plan; NCC Rail Prospectus; NCC Local Transport Plan; GYBC North Quays SPD

Report by Planning Policy Officer

Summary

This report outlines the officer's proposed response to planning policy consultations recently received, and invites Members' comments or guidance.

Recommendation

To note the report and endorse the proposed response.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's endorsement, comments or guidance are invited.

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Date of report: 19 February 2020

[Broads Plan](#) objectives

Appendix 1 – Rollesby Neighbourhood Plan pre-submission consultation

Appendix 2 – Norfolk County Council Rail Prospectus

Appendix 3 – Norfolk County Council Local Transport Plan

Appendix 4 – Great Yarmouth Borough Council, North Quay SPD.

Appendix 1 – Rollesby Neighbourhood Plan pre-submission consultation

Organisation: Rollesby Parish Council

Document: Rollesby Neighbourhood Plan Pre-Submission Consultation

<https://rollesbypc.norfolkparishes.gov.uk/2019/11/05/rollesby-neighbourhood-plan-consultation/>

Due date: 28 February 2020, but we have an extension to 6 March 2020.

Status: Pre-Submission Consultation

Proposed level: Planning Committee endorsed

Notes

Rollesby 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 15 January through to 28 February 2020.

The consultation offers a final opportunity for you to influence Rollesby's Neighbourhood Plan before it is submitted to Great Yarmouth Borough Council.

All comments received by 28 February 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
- Design of new development
- Heritage
- The Natural environment
- Community assets
- Flood risk
- Traffic and transport

Proposed response – summary of main points

Main document

- Page 11, policy HO1: bullet point b says that development outside of allocation and development limit may be acceptable if it has other community benefits. This is

contrary/different to our strategic policy SP15 d and we therefore have big concerns about this wording. We are concerned that it could be promoting dwellings that are isolated and lack access to services and facilities. This could even be contrary to the NPPF para 79. **This is an area of concern.**

- GYBC Local Plan did not allocate the specific sites that this Neighbourhood Plan does and did not allocate 90 dwellings to the village. How is the HRA for GYBC Local Plan actually relevant and therefore how can it be deferred to/relied upon? **This is an area of concern.**
- In the HRA, under Recreational Pressure, there is no reference to impact and assessment of potential for any increase in boat access for parishioners and local anglers. **This is an area of concern.**
- There could be improved reference in the Plan to the Broads and our planning documents.
- The Plan needs to refer to the impact on the setting of the Broads as well as impacts on the Broads.
- Some wording in supporting text of the Plan sets standards and that wording might be best in the policy itself.

The Environment Report

- The Broads specific criterion does not refer to the setting of the Broads.
- There does not seem to be any commentary on how the negative effects have been addressed, if indeed they can be. They just seem to be identified as negative effects with no mitigation.

Comments on Neighbourhood Plan

- Throughout – you refer to various statistics and evidence – suggest you say the source and year of the evidence.
- Throughout – how does the HNA relate to GYBC's SHMA? Is there a link to the HNA that could be put in the document?
- Para 1 – last sentence. Later (para 90) you talk about how the bus service is quite poor. You might want to clarify this reference using similar language to that in para 90 and in para 90 you might want to detail the frequency of services – for example, are there any to and from Rollesby between 7am and 9am and 4pm and 6pm?
- Para 2 – you might want to make this change: '...from the field and from many homes...' to make it read better.
- Para 5 – '...and a number of Listed Buildings **and** has been designated...'
- Page 3, figure 1 – request you add the Broads Authority area and a key.

- Page 5, last bullet – please refer to the setting of the Broads as well
- Paras 19 and 20 – please refer to the Local Plan for the Broads that was adopted in May 2019.
- Para 32 – typo – not
- Page 11, policy HO1 – para starting ‘Elsewhere...’. Does it matter that the threshold of five that you state is below the level at which affordable housing can be required (which is ten)? You will not be able to seek affordable housing on schemes of this size. You may want to discuss this with GYBC.
- Page 11, policy HO1: bullet point b says that development outside of allocation and development limit may be acceptable if it has other community benefits. This is contrary/different to our strategic policy SP15 d and we therefore have big concerns about this wording. We are concerned that it could be promoting dwellings that are isolated and lack access to services and facilities. This could even be contrary to the NPPF para 79. Rather than saying ‘Small in-fill proposals within the development limits of up to five dwellings will be supported in principle as long as the proposal does not unduly harm the local character in terms of landscape and adjacent buildings, amenity, important views, and is a gap within an otherwise continuous line of housing or development’, perhaps the following wording could be used: ‘In-fill development of up to five properties on gap-sites will be supported in principle, as long as the proposal is within the development limit. It must also be sympathetic to its context, including the surrounding built environment, its landscape setting and must respect views and the amenity of neighbouring properties’.
- Para 41 – the Broads Authority can demonstrate a 5 year land supply. You might want to say that.
- Para 41 – Grammar ‘...The County Council has agreed that not to...’
- Section 6.2 – you might want to state the source of this data
- Policy HO2, para 3 – is viability the only reason to part from policy? What about local housing need evidence?
- Policy HO2, last para – I do not fully understand this. Perhaps add an explanation in the supporting text.
- Para 50 – this looks like policy requirements and seems appropriate to be in the policy itself.
- Para 50 – I think life time homes is addressed through Part M of the building regulations. We removed the reference to Life Time Homes from our Local Plan before it was adopted.
- Para 51 - this looks like policy requirements and seems appropriate to be in the policy itself.

- Paras 52, 53 and 54 – what is the instruction related to these paragraphs? What do these add?
- Policy HO3 – you might want to check with GYBC if the wording relating to those who will live in affordable housing is relevant to planning.
- Para 56 – ‘...will need **to** have due regard to...’
- Para 57 – re archaeology. There will be known unknowns and unknown unknowns. So not just limited to the 60. You might want to refer to the Broads area having potential for exceptional waterlogged heritage. It is only an area along Fleggburgh Road that is designated a conservation area (not Martham Road). I would suggest that a list of listed buildings and any buildings of local interest are identified in an appendix.
- Policy HO4 – we have a landscape guide: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0005/986657/Landscaping-Strategy-guide_2017-Appendix-B-ba280717.pdf. Also, did you want to talk about the potential for biodiversity enhancements? We have a guide on that too: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0011/823583/Biodiversity-guide_18_11_2016.pdf.
- Policy HO4 d: wording should be added along the lines of ‘The character, integrity and appearance of heritage assets will be protected and where possible enhanced’ – or this could be a separate policy to apply to both listed buildings and conservation areas? Point j: ‘off the A149’? Do you mean developments fronting the A149?
- Page 20, figure 4 – as this is a planning document, we request that you say ‘Broads Authority Executive Area’ rather than National Park.
- Policy E1 – on page 22, penultimate para of the policy box, what is ‘significant’? Last para of policy box – not just within the area, but those near need to take into account the Broads and its setting. Please include that.
- Para 74 – the Broads has a Landscape Character Assessment too: <https://www.broads-authority.gov.uk/planning/planning-policies/landscape-character-assessments>.
- Preserving local character (and darkness), openness of views and ensuring landscape treatment (particularly to boundaries) need to be compatible with the agricultural/rural landscape. I believe that all of this has been covered under Policies E1, E2 and E3. Surprised to see there are only 2 important views identified, however in terms of the Broads area and bearing in mind the generally wooded character surrounding the Trinity Broads there might not be individual views that need identifying. In addition, any views that could potentially need further consideration would be picked up within the assessment process for any planning applications.
- Is there the potential for some contradiction between the proposals for development located along the A149 to join the two parts of the village together and the objective to retain open views across the landscape (Policy E2 and elsewhere in the document)?

- Policy E2, first para on page 25 – not just the setting of Rollesby, but the Broads as well. Please mention that. The third paragraph about protecting productive agricultural land – the allocations are all on grade 1 and 2 and there is no reference to this in the Neighbourhood Plan anymore. Strongly suggest you refer to that issue rather than not include it.
- Policy E3 – you might want to state that you are excluding the Broads from this policy as we have a policy that would apply to Rollesby part of the Broads. Those reading the policy might wonder why you are excluding a protected landscape from the policy if there is no explanation. Para 2 – you might want to say ‘will only be supported’
- Policy E4, b – you might want to refer to SuDS being multi-functional. Last paragraph of policy – we have a policy on that; see DM2. How do you see your policy fitting with ours?
- Policy CA2 – do you think that the requirements in this policy are in keeping with the NPPF and Green Belts? Or do they go further? If they go further, you may need to set this out explicitly. That being said ,page 30-31, Policy CA2 Designated Local Green Spaces - not sure how well the policy will protect these due to the wording – ‘will not be permitted unless there are very special circumstance which significantly outweigh the harm to the Local Green Space.’ It might help if worded more strongly. For example, Norwich Open Space Policy is worded ‘development leading to the loss of open space ... will only be permitted where:’
- Para 89 – do you have any evidence relating to speeds? Have you spoken to Norfolk County Council about recent speed surveys? Have you completed your own speed survey?
- Para 90 – you might want to detail the bus service as referred to earlier.
- Para 94 – says ‘support for supporting’ and perhaps this could be worded better. But does para 94 contradict para 95 where you say the standards are out of date. I was confused reading paras 94 and 95 – are you saying they are out of date but you will use them? What about if they are updated?
- Policy TR1 – towards the end of para 1, you say ‘should’ a few times. This is weak wording and elsewhere in the Plan you say ‘will need to’ and that is stronger. Did you want to use stronger wording?
- Policy TR2 – what kind of improved cycling facilities do you want? You talk in a bit more detail in the policy about footway improvements, but not so much in detail about cycle improvements.
- Para 104 – again, any evidence about speeds? Any evidence or justification for both sides of the road needing to be developed to get a 30mph? Is that advice from Norfolk County Council as Highways Authority?

- Policy SSAO1 – should the masterplan refer to affordable housing? Who will agree the masterplan? Should the masterplan look to reduce built area considering all the sites are grade 1 or 2 agricultural land? Should the masterplan show SUDS so they are planned in from the start?
- Policy SSAO2 to SSAO4
 - You might want to say ‘...in accordance with the agreed masterplan...’.
 - Regarding ecological gain, did you want to refer to potential requirements put in place by the Government? They may have a different value and refer to biodiversity or environmental net gain you see. It could be that your NP standard is in place until a Government standard takes over and then you will review things in 2029?
 - Criterion c – where did this requirement on 10% of dwellings come from? The associated policy/wording elsewhere in the Plan does not say this (para 51). That seems quite a low threshold – what is your justification for 10%? I would have thought the standard you set out should be applied to all of the dwellings on this scheme.
- Policy SSAO2 –d – what are the proposed improvements?
- Policy SSAO3 – what do you mean by ‘substantially’?
- Policy SSAO5 – does not mention SuDS or energy standard wording as is included in other policies.
- Figures 12 and 14 – please show the Broads. Suggest the maps are larger. Suggest that each site has its own map so the detail can be shown.
- Page 40-41, there is a reference to Policies Map Figure 13 within Policy SSAO1, SSAO2 and SSAO3, but figure 13 is a table to - assume the reference is incorrect.

Comments on HRA

- No page numbers
- Figure 3 and under figure 5 – think you mean Happisburgh
- How is the HRA for GYBC actually relevant and therefore how can it be deferred to? GYBC did not allocate the specific sites that this Neighbourhood Plan does.
- The HRA keeps referring to the 10% ecological gain required by the Neighbourhood Plan. But that is not really relevant to impacts on protected sites. It would be helpful if that was made clear.
- P3 Spelling of Breydon
- 1.1, second para – rather than saying ‘significant negative effects’ just use the accepted terminology of ‘likely significant effects’.

- Section 2, first para – needs some better punctuation and re-read.
- Figures 3, 4, 5 – you may want to mark the 15km boundary on these maps
- Page 5 – last set of bullets – there are five there, what happened to the other 4 from Figure 1?
- P6 Potential impact pathways – add disturbance from lighting
- P6 Recreational Pressure – add a description of impact and assessment of potential for any increase in boat access for parishioners and local anglers. This element is missing from the recreational assessments which are focussed on walkers throughout the document. This needs to be amended in other relevant areas of the document.
- Page 6 – second para of 3.2 – why just the Broads sites? Why not other protected sites?
- Page 7 and in general – the emerging Norfolk GI RAMS says all dwellings are in a zone of influence and therefore there will be a LSE.
- 3.3 – was the GYBC HRA since the ruling about in combination effects of nitrogen deposition? Therefore is the conclusion correct?
- P7 3.4. Water quality and quantity – the assessment of impact is missing from this section making it inconsistent to e.g. 3.3 and 3.5
- 3.4 – it is not clear if effects on water quality and quantity is ruled out or not.
- Figure 6 and top of page 8 – the difference in distances set out in Figure 6 are up to 700m – so why has only the nearest allocation been considered. If a cat wanders another 200m from RNP02 or 300m from RNP03 for example, it is at the Broadland SPA? Also those extra distances are not far when in a car to fly tip...
- Figure 8, HO1, description column – the second part of the policy directs where growth can go – so are you sure there is no LSE?
- Figure 8 - CA1 description column talks about the creation of new services but the LSE column says that development would not come forward as a result of this policy – is that right?
- Page 12 – table – top two rows – there is no mention of the GYBC monitoring and mitigation strategy.
- 4.2 – if the RNP allocated more than the GYBC policy, is the conclusion of the GYBC HRA still relevant?
- Page 14 and 15 – figures 11 and 12 – is the GI RAMS ZOI relevant?
- Page 15 second para under figure 12 – is PROW in phase 3 too late? When will the 1.42Ha of green space be delivered?

- Page 15, third para under figure 12 – how does biodiversity net gain mitigate impacts on European sites?
- Page 16 – where has the 5km distance come from?
- 5.1 – does not mention recreation impact, but 5.2 is about recreation impact.
- 5.1, para 2 – again use ‘likely significant effects’
- 5.2, para 1 – add y to ‘Horse’ in ‘Winterton-Horse Dunes SAC and SSSI’.
- Page 17, last para –when will the green space be delivered? What phase?
- Top page 18 – I think this is the first mention of the GYBC monitoring and mitigation strategy.
- Para just above 5.4 – what about the other allocations? Why just focus on this one? All are generally in the same area and similar distance from sites.
- Page 19 top – later on there is reference to surface water management so should surface water run-off be mentioned in this paragraph too?
- P19 ‘Nutrient levels in the Trinity Broads are higher than recommended for shallow lakes....’ It is a requirement not a recommendation. Suggest change to ‘Nutrient levels in the Trinity Broads are failing to meet the required targets set for the SAC. This results in algal blooms and associated decline in water plants and other aquatic wildlife ’
- P19 Water abstraction and excessive summer drawdown may also effect water quality and water clarity
- P20 second para ‘It is evident from the screening undertaken that many of the policies already provide strong protection for the natural environment’ – remove ‘strong’ and replace with ‘a level of’. If these policies result in changes being implemented, they are unlikely to reverse the current rates of biodiversity decline or fully protect the natural environment.
- P22 Appendix A: the condition is referring to SSSI condition? This needs to be stated.
- Para just above 6.2 – what is the ‘strategic mitigation’ referred to?
- 6.4 – use the term ‘likely significant effects’.
- I recommend to contact E&SW Miranda Cooper Miranda.Cooper@nwl.co.uk and Trinity Broads Warden Eilish Rothney EilishR@norfolkwildlifetrust.org.uk if you haven’t already done so.
- As well as links to referring to the Broads Local Plan and the Broads Management Plan, reference to Trinity Broads Management Plan, for information on the SAC condition, recreational management and assessment of disturbance needs to be made. This local document contains greater information on existing protections against disturbance,

for example voluntary wildfowl refuges during the winter months to avoid disturbance.

Comments on Environment Report

- Page 1, third column of table at bottom – and the Broads Authority
- Page 10, issue 5 – what key services are nearby? What is the distance and how does one do that? The Secondary Village reference resulted in an allocation of 20 dwellings, not around 90 dwellings. So is Rollesby suitable for 4.5x the allocation that was set out in the GYBC Local Plan?
- Page 11, issue 16 – as this is a planning document, best not to refer to the Broads as a National Park.
- Page 18, row 18 –the questions relating to the Broads should be something like ‘Does the proposal impact negatively on the Broads and its setting?’
- Considering my comments above, Figure 14 on page 25 might need updating.
- Section 4 – There does not seem to be any commentary on how the negative effects have been addressed, if indeed they can be. They just seem to be identified as negative effects with no mitigation. How do you address the negatives that you have found to try to make them neutral or positive? I cannot see that.
- Page 35, 4.3.22 – not sure how this conclusion can be reached without detailing how one would access the key services. See previous comments.

Appendix 2 – Norfolk County Council Rail Prospectus

Organisation: Norfolk County Council

Document: Norfolk County Council Rail Prospectus

<https://norfolk.citizenspace.com/consultation/norfolk-rail-prospectus-2020/>

Due date: 28 February 2020 (extension until 6 March 2020)

Status: Draft

Proposed level: Planning Committee endorsed

Notes

We want your views on the rail priorities for our revised rail prospectus. The current Norfolk Rail Prospectus was agreed in 2013. It shows in detail what the council believes is required from rail and the benefits that this will deliver. It will be used in our work so that as many as possible of these requirements are built into forthcoming programmes.

Proposed response – summary of main points

- The comments seek improved reference to linked modes of transport/multi-mode transport – for example e-bikes, cycle parking, charging infrastructure.
- The issue of the train being an alternative to cars when accessing the Broads for holidays is raised.
- Raised the issue of stations being of heritage value and sensitive repair.

Page 33 – why the decline on the GY line? Rail seems an obvious solution considering the unreliability of the Acle Straight. Is it the cost when compared to the bus that takes a similar time?

Page 35 – reference to cycle racks needs more I would suggest. Conveniently located secure cycle racks with CCTV coverage. Where it says ‘all stations to have facilities’ – other than CCTV and racks (which is mentioned later on and needs more on that) what do you mean? As worded, it is not helpful. Facilities is in the list later on. Then talks about need for car parking facilities – first time this is mentioned – how important is being able to drive to a station?

Page 37 – section on bikes on trains – so what is the recommendation? Section is lacking.

Page 45: ‘id required’

Throughout there is reference to car park CCTV – what about cycling parking being covered by CCTV?

Is work completed in 2009 still relevant in 2020?

Is it worth cross referring to the numerous Market Town Access Improvement Strategies that are being completed?

Suggest that the sensitive repair and re-use of building of heritage value (either listed or of local list) should be a particular priority.

Increasing use of trains as an alternative to cars as a way of accessing the Broads National Park will be key to reducing the Global Warming impact of tourism.

Very supportive of anything to improve cycle connectivity at rural stations. Particularly with the growing popularity of e-bikes this will become a more popular form of multi-modal transport. This could also be part of the solution to the comment made by a lot of our parish councillors that they feel car dependent and are cut off from public transport.

I think the overall prospectus could be better at focusing on trains as part of multi-modal transport as a general principle, which includes both bus and cycle connections at either end, and green cars.

Pricing? Set nationally - but would be nice if the Council took a stance on the cost of rail. Potential for cheaper tickets at weekends when lines are less busy to attract more customers? Something contrasting it to the price of cars on the routes – they highlight that the route to the North Norfolk coast is too slow, but also quite expensive for a family to go by rail instead of by car if they want to visit the seaside at Cromer or Yarmouth, or start a day out in the Broads. This is not just about complexity of ticketing, which is all the prospectus mentions.

Lots of reference to improved car parking, no reference to charging infrastructure for cars at rail station car parks. This could be relevant for people who use the stations as “park and ride” facilities, for example driving from Waxham to Acle and then getting the train into Norwich.

Appendix 3 – Norfolk County Council Local Transport Plan

Organisation: Norfolk County Council

Document: Norfolk County Council Local Transport Plan

<https://norfolk.citizenspace.com/consultation/norfolk-county-council-local-transport-plan-2020/>

Due date: 28 February 2020 (extension until 6 March 2020)

Status: Draft

Proposed level: Planning Committee endorsed

Notes

We want your views on the key areas we are focusing on for our next Local Transport Plan. The current Local Transport Plan for Norfolk was agreed in 2011. Since that time there have been many changes to the way that people travel, and how much. Technology has meant that we are now increasingly able to live our lives without the need to travel, for example using online resources such as internet shopping. The way we travel is also changing, with more information and more technology being built into vehicles and more options such as car clubs and bike share schemes. Norfolk County Council has also recently adopted an environmental policy to achieve 'net zero' carbon emissions on our estates by 2030, but within our wider areas, work towards 'carbon neutrality' by 2030

Proposed response – summary of main points

- Issue of greater spends resulting in increased CO2 emissions and the CO2 impact of building the road itself raised.
- Also raised making the transport network resilient to climate change.
- Alternative fuels, other than electric cars, needs to be addressed.

1. When considering CO2 neutrality vs road improvements, one consideration needs to be the impact of speed limits on emissions. Raising speed limit to 70mph from 60mph would lead to an immediate 15% increase in CO2 emissions from transport. This has also been a particular recent problem in the Netherlands regarding Nitrogen deposition in protected areas, forcing them to reverse speed limit increases.
2. When considering CO2 neutrality and road building, what about the CO2 impact of building a road itself? Widening roads could involve substantial disturbance of centuries old grassland, major carbon store in its own right, which would run counter to the Councils Million trees programme.
3. The Centre for Alternative Technology Zero carbon report highlighted that for a zero carbon Britain there needs to be, in addition to a switch to electric and alternative fuelled vehicles;
 - a. Less miles driven

- b. Work to increase average vehicle occupancy from 1.6 per journey to 2. More car sharing essentially.

As it currently stands the questions indicate that the strategy is to allow a continuous increase in miles driven, which will mostly be driven in petrol and diesel cars, and make it harder to meet the stated 2030 carbon neutral target.

- 4. Hydrogen and other alternative fuels – There needs to be a fuel for working with heavy agricultural machinery, heavy construction machinery, long distance lorries, long distance buses. These are also a potential option for trains on less used rural routes, as an alternative to expensive electrification. These options are not picked up by only focusing on electrification.
- 5. Should the aims and objectives include modal shift to more sustainable modes of transport and reduction in greenhouse gas emissions as well as making the transport network in Norfolk resilient to the effects of climate change?

Appendix 4 – Great Yarmouth Borough Council, North Quay SPD.

Organisation: Great Yarmouth Borough Council

Document: <https://www.great-yarmouth.gov.uk/planning-consultations>

Due date: 23 February – we asked for an extension to 6 March 2020 and sent them the draft responses on 23 February 2020.

Status: Draft

Proposed level: Planning Committee endorsed

Notes

The SPD is being prepared to guide the potential comprehensive regeneration of the North Quay area, complimenting the vision set out in Policy CS17 of the adopted Local Plan Core Strategy. When finalised the SPD will provide further guidance and clarity on the Council's ambitions for North Quay, as well as the site constraints and other matters that would need to be considered by anyone looking to develop a future scheme or planning application for that site.

Between October and November 2019 the Council published the North Quay Consultation Leaflet in order to obtain the public's initial views on what needs to be considered in the Supplementary Planning Document. All responses received during this previous consultation have subsequently been considered by the Council and have informed the formal draft document, which we are now seeking further comments on.

Proposed response – summary of main points

- Improve reference to the site being next to the Broads Authority Executive Area.
- The views from the water to the development are important and not referred to.
- Would welcome emphasis that the scheme embraces the waterside/waterfront location.
- This is a potential gateway between the urban area of Great Yarmouth and the Broads, resulting in this location being sensitive in visual terms.
- Concern that the requirement to enhance the ecology of the area is dampened down by saying 'consider' or 'where possible'.
- Some colours on plans are not explained on keys.

Comments on Draft SPD

- 1.2 - Vauxhall Bridge is grade II listed.
- 1.8 - recognises that the SPD proposals for North Quay have direct relationship with regeneration of The Conge and Hall Quay. It would be useful for the mappings and narrative to include reference to the Vauxhall Gardens project that the County Council

developed (2017) and have LEP funding available for/until March 2021. The land acquisition exercise being explored by GYBC in connection with the SPD could enable this project to be delivered whereas it has previously been constrained. Relevant contacts with knowledge of the proposals are David Glason and Jane Beck at GYBC, and David Wardale at Norfolk County Council.

- Page 7 – please refer to the site being next to the Broads Authority Executive Area
- Page 8 – please add the Broads Authority Executive Area
- Figure 2 – it could be made more explicit as to whether this figure is existing or proposed. What does the pale yellow colour in the NW corner represent?
- Page 13 – you could add character to the ‘Townscape...’ title and refer to the Broads. An acknowledgement that the site is next to the Broads would be prudent.
- Page 13 and Figure 3 – Might be worth identifying buildings that aren’t listed but may be of local value, for example the old fish restaurant as it has an impressive frontage.
- Page 15, 2.22 – reference BA area
- Photo page 26 image title is misleading, it shows Cobholm and Southtown rather than Gorleston
- Page 26, 4.1 – Positive that there is recognition of spectacular views over Breydon Water, but should also recognise the importance of views towards potential development. Suggest including a bullet point that recognises the importance of views from the water, as a gateway to the town, and improving the character of the area
- Page 27, Objective B – anything about making the most of a waterfront location? Will development embrace that location or turn its back on it? I see that on page 31 there seems to be public realm by the water – cannot see this discussed in the SPD.
- Page 28, Objective C – anything about appropriate safety by the water features?
- Page 28, Objective D – this has a different title to the other objectives by using the term ‘considerations’. This could be seen as not as being as important as the developer or promoter only needs to consider these things. Have you considered enhancing people’s ability to connect with setting, wider landscape and environment; encourage people to build a positive respectful relationship with nearby conservation sites?
- Page 30 – what is the green area? Asda is slightly off plan, so this large retail unit isn’t identified. What is the yellow/green colour in between buildings, not identified on key? Can views towards the development area be considered in addition to those within and out of it? Although this diagram shows the listed buildings within the GY North Quay policy area, it does not show the listed Vauxhall Bridge and the listed buildings on the east side of North Quay which are situated on the boundary of the area. I would suggest that these are also shown as the setting of these buildings will be important considerations (and there are other things shown outside the policy area).

Likewise, in para 5.51 the three listed buildings within the policy area are noted but not the four on the opposite side of the road which will also need to be taken into account.

- Page 31 – what is the brown dashed line circle? The light coloured public realm symbol is difficult to see. What is grey? The one darker brown bit is a development boundary? What is the tan colour that is not quite brown, but is darker than the public realm symbol? It is not on the key. What is this plan trying to show, seems to show less detail than fig 4 and different approach, but can't be clearly interpreted from the key. Key doesn't match plan (listed buildings keyed as development boundary) Do you really want vehicle access onto waterfront, this figure seems to suggest it, but this doesn't seem conducive to the overall vision?
- Page 32 – We notice that a lot of detail and advice is given around designing for flood, here and throughout the document (flood risk section), but the same level of detail isn't given about other aspects of design, i.e. design style or visual impacts. Why is this?
- 5.4 and 5.76 – is 3a the highest flood risk area? I thought 3b was?
- Page 35 – what relevance do these images have?
- Page 41 – Images about scale and density, could be confused for images about architectural style, have you considered providing a section with some architectural style guidance and grouping reference images together?
- 5.25 – overlook the waterfront is different to embracing the water front position. Would suggest that the scheme needs to embrace this location rather than look at it. Terminology of 'where possible' doesn't feel strong enough, there appears to be a real opportunity here for environmental enhancement, would be good to avoid presenting them as 'nice to haves'
- Page 38, last bullet – provides a get out clause by saying 'where possible'. It is not clear why such a caveat is required. Especially given that the NPPF refers to biodiversity net gain.
- 5.30 – Need to reference verified process of assessment, Guidelines for landscape and visual impact Assessment Third Edition, Landscape Institute and Institute of Environmental Management & Assessment (GLVIA 3).
- 5.32 – Roofscapes, have you considered any guidance on green roofs, sensitivities around positioning and visibility of plant or sustainable energy equipment on roofs?
- 5.33 – Landmark buildings, figure 5 identifies a number of different locations for landmark buildings, is the expectation that the area could accommodate all of these, or are they just alternative locations? Suggest this is made clear. If it is for multiple landmark buildings, what impact would this have on the character of the area?

- 5.42 – Visual assessment, overlap with para 5.30, reference to verified process of assessment (GLVIA 3) should also be included
- 5.43 Public realm next to the water seems nice, but what will make people want to be there to experience it? What is the attraction? Who would use it? Same with the cycle path and walking route – what is that for and who would benefit from it and use it – where does it go?
- 5.44 – Is another opportunity to link to threeways meeting point (Weavers' Way, Wherryman's Way and Angles Way footpaths
- 5.45 – Could/should this be worded more strongly than 'where appropriate'?
- 5.46 – what about adapting to climate change?
- Throughout – the use of 'must' versus 'should' and what you actually want to achieve.
- 5.55 – It seems that there is a recommendation to use a particular professional service specifically around conservation, but not elsewhere for other professionals, i.e landscape architects or urban designers. Why is this?
- Figure 8 – We notice this could encourage an approach to have ground floor parking but this can create blank frontages, also could be counter to general message about low car usage and promoting sustainable transport modes. Have you looked at how this has worked in Norwich riverside area?
- 5.86 – first mention of dark river corridor. That needs to be a criterion in the design section rather than being mentioned in passing at page 57.
- 6.7 – is the Broads Authority included in this group? Is that how we will be involved?
- 6.13 - Title of Delivery Vehicles could be confusing, could the word method or plan replace vehicles
- Photos lack image references throughout document
- All figure keys difficult to read – unless white background placed behind (figure 5 key particularly difficult to read)
- This is a potential gateway between the urban area of Great Yarmouth and the Broads, resulting in this location being sensitive in visual terms. The appearance, height and scale of any development and the visual impact on those approaching Yarmouth (particularly by water but also those travelling by rail and road) needs to be carefully considered. There is recognition of the importance of views out of and within the development area, but views towards it are equally (if not more) important.
- This location as a gateway. This development area is a location where people's physical and experiential connection with the Broads, the wider landscape and our environment could be enhanced. At the very least this could include measures already cited in the SPD draft, such as allowing people to access the spaces near to the river

and ensuring foot and cycle paths are well connected, in addition it should include good links and signing to the three walking routes (Weaver's, Wherryman's and Angles Way). Going further than that, is there potential for a visitor's centre at the site? This could be close to the rail station and Breydon Water and would be where people access information and education about what the Broads area and the historic Quay has to offer.