

Planning Committee

21 May 2021

Agenda item number 11

Responses to consultations received

Report by Planning Policy Officer

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.

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: 10 May 2021

Appendix 1 – Planning Policy consultations received

Appendix 1 – Planning Policy consultations received

Organisation: MHCLG

Document: [Changes to permitted development rights for electronic communications infrastructure: technical consultation - GOV.UK \(www.gov.uk\)](#)

Due date: 14 June 2021

Status: Final consultation on proposed reforms.

Proposed level: Planning Committee Endorsed

Notes

This consultation seeks views on proposed changes to permitted development rights for the installation, alteration and replacement of electronic communications infrastructure. This consultation looks at how to implement the [proposals consulted on in August 2019](#) to support the deployment of 5G and extend mobile coverage.

Permitted development rights for electronic communications infrastructure are set out in Part 16 of Schedule 2 to the General Permitted Development Order 2015 (as amended). The proposed changes are:

- To enable deployment of radio equipment housing by permitting small equipment cabinets on Article 2(3) land^{[\[footnote 1\]](#)} (which includes, the Broads, National Parks, Conservation Areas and Areas of Outstanding Natural Beauty), and allowing greater flexibility for installing equipment cabinets in existing compounds;
- To enable the strengthening of existing masts by permitting limited increases in the width of existing ground-based masts without the need for prior approval, and greater increases subject to prior approval, on all land. Also allowing for limited increases to the height of existing ground-based masts without the need for prior approval outside of Article 2(3) land, with greater increases on all land, up to specified limits, subject to prior approval;
- To enable the deployment of building-based masts by permitting these in closer proximity to a highway subject to prior approval outside of Article 2(3) land. Also, whether to permit smaller masts to be installed without the need for prior approval outside of Article 2(3) land; and
- To enable the deployment of new ground-based masts by permitting taller new masts, up to specified limits, on all land subject to prior approval, with greater permitted heights on land outside of Article 2(3) land. Also, whether to permit monopole masts of up to 15 metres to be deployed without the need for prior approval on land outside of Article 2(3) land.

None of the proposals above would apply on land on or within sites of special scientific interest.

Changes to the safeguarding procedure and technical changes to the definition of ‘small cell system’ are also proposed.

Summary of proposed response

There is great concern about the proposals that could see more schemes being classed permitted development in protected landscapes like the Broads. Even more concerning is the move to remove the need for prior approval for some schemes. The response generally does not support the proposals.

Proposed response

Introduction

We are keen to support wider broadband and mobile coverage in rural areas, including the Broads and we recognise the social and economic benefits that this brings. Vibrant rural economies and communities are essential to underpin our landscapes and their special qualities, and digital connectivity is a key issue. The consultation seeks changes to the PD rights relating to telecommunications. Mainly moving the planning approach to certain developments along the hierarchy – permission to prior approval and some prior approval to not needing prior approval.

Impact of proposals on the Broads

We would like to share some images of the Broads. The Broads is a protected landscape, treasured locally, nationally and indeed internationally. The Broads has the equivalent status of a National Park. It is included as Article 2(3) land. The images are intended to show that masts could potentially be placed in the areas shown without proper consideration during a planning application process, and for some schemes, without prior approval.





What is the need for the proposed changes?

What evidence is there that requiring planning permission slows down delivery? What evidence is there that such schemes tend to be refused? What current issue is this change trying to address? In the case of telecommunications development, monitoring data shows

that of those schemes in which National Parks and the Broads, as Local Planning Authorities, were notified appropriately in advance, 90% were approved/went ahead. Fellow protected landscape authorities were unaware of cases of refusal except in isolated cases where the damage to landscape would seriously undermine National Park/Broads purposes.

Environmental Impacts of 5g

We understand there are environmental impacts of 5g. What risk assessments have been completed on the impact of 5g on the environment and wildlife? Literature seems to indicate that the radiation could be harmful to insects and pollinators.

We also note this:

5G: Pollinators and Wildlife: Parliamentary Written question 266891

Asked by Ben Lake MP (Ceredigion) 19 June 2019

“To ask the Secretary of State for Health and Social Care, what assessment he has made of the potential effect of the roll out of the 5G network on wildlife and pollinators.”

Answered by: Minister Seema Kennedy 28 June 2019

“No assessment of the potential effect of the roll out of the 5G network on wildlife and pollinators has been made.”

Detailed comments on the changes proposed

- Single developments of small radio equipment housing would be permitted without the need for prior approval, with larger equipment housing subject to prior approval, in all areas except land on or within sites of special scientific interest;

This change will result in such housing within conservation areas and protected landscapes and therefore will impact on those assets.

- Restrictions on singular developments and cumulative permitted development of radio equipment housing would be disapplied where these are located in an enclosed compound, subject to restrictions that ensure new equipment does not have an adverse visual impact on the local area;

There seems to be no proposals to control the scale, size and massing of the items that can go within this compound. A large item could have a great impact on the area for example, even if within a compound. It would therefore seem prudent to place restrictions on what could be placed within compounds without the need for planning permission.

Could new compounds be put in place in order to take advantage of this change? That is to say, could this change with no restrictions be taken advantage of?

- For existing ground-based masts less than a metre in width, alteration or replacement of the mast with increases in width of up to two-thirds would be permitted without the need for prior approval. Greater increases in width would be permitted subject to prior approval;

There seems to be no consideration of what the land that is being extended into is used for. For example, what if it is section 41 habitat of the NERC Act?

The greater scale and massing of the new mast could have impacts on the area and these could not be assessed and therefore identified to be mitigated with the changes.

- For existing ground-based masts more than a metre in width the government is consulting on two options: A) the alteration or replacement of the mast with increases in width of up to half or two metres (whichever is greater) without the need for prior approval in all areas; or B) the alteration or replacement of the mast with increases in width of up to one third or one metre (whichever is greater) on Article 2(3) land without the need for prior approval, and half or two metres (whichever is greater) elsewhere. In either case, greater increases in width than those specified above would be permitted subject to prior approval;

There seems to be no consideration of what the land that is being extended into is used for. For example, what if it is section 41 habitat of the NERC Act?

The greater scale and massing of the new mast could have impacts on the area and these could not be assessed and therefore identified to be mitigated with the changes.

- Alteration or replacement of existing ground-based masts which increases the height up to 25 metres would be permitted subject to prior approval on Article 2(3) land or land on a highway;

The consultation does not give an indication of the current usual height of masts to which this upward extension would apply. This lack of information means that the actual impact cannot be considered. For example, say the mast heights at the moment tend to be around 23 or 24m high, then an increase of 1m to the capped height may not be an issue. But if masts are currently, say, 10m or so then an increase of height of more than double the current height, to reach the capped height of 25m is extremely significant.

The greater scale and massing of the new mast could have impacts on the area and these could not be assessed and therefore identified to be mitigated with the changes.

- Alteration or replacement of existing ground-based masts which increase the height up to 25 metres would be permitted without the need for prior approval outside of Article 2(3) land and land on or within sites of special scientific interest. Greater increases in height up to 30 metres would be subject to prior approval;

We note that the NPPG changes that were recently out for consultation, proposed a change to emphasise the importance of the setting of protected landscapes. Allowing extensions of masts up to 25m in areas near to protected landscapes without prior approval could lead to detrimental impacts on the setting of protected landscapes.

- Installation, alteration or replacement of building-based masts up to 10 metres in height above the tallest part of the building within 20 metres of the highway, on buildings less than 15 metres in height, would be permitted subject to prior approval outside of Article 2(3) land and land on or within sites of special scientific interest;

We note that the NPPG changes that were recently out for consultation, proposed a change to emphasise the importance of the setting of protected landscapes. Allowing extensions of masts up to 25m in areas near to protected landscapes without prior approval could lead to detrimental impacts on the setting of protected landscapes.

- In addition, the government is considering permitting the installation, alteration or replacement of building-based masts up to 6 metres in height above the tallest part of the building without the need for prior approval outside of Article 2(3) land and land on or within sites of special scientific interest;

We note that the NPPG changes that were recently out for consultation, proposed a change to emphasise the importance of the setting of protected landscapes. Allowing extensions of masts up to 25m in areas near to protected landscapes without prior approval could lead to detrimental impacts on the setting of protected landscapes.

- With the exception of land on or within sites of special scientific interest, installation of new ground-based masts up to 25 metres on Article 2(3) land or land on a highway, and 30 metres on other land, would be permitted – in both cases subject to prior approval;

This change will result in masts up to 25m within conservation areas and protected landscapes and therefore will significantly impact on those assets. You are probably aware of the work that Power Networks UK have completed, with further projects likely to come forward over the coming years, to ground cables in order to remove pylons and cables from protected landscapes to remove such significant detractors. These changes would effectively mean that the benefit from removing pylons (which one can equate to having a similar impact as the proposed masts, in the absence of images) is likely to be undone by the ability to place masts in protected landscapes without the need for planning permission.

- In addition, the government is considering permitting the installation of monopoles up to 15 metres in height without the need for prior approval outside of Article 2(3) land and land on or within sites of special scientific interest.

The consultation does not give an indication of the current usual height of masts to which this upward extension would apply. This lack of information means that the actual impact cannot be considered. For example, say the mast heights at the moment tend to be around 13 or 14m high, then an increase of 1m to the capped height may not be an issue. But if masts are currently, say, 5m or so then an increase of height of more than double the current height, to reach the capped height of 15m is extremely significant. Even if it is a single pole.

Some kinds of monopoles need supports anchor in the ground. How have these been factored into the impact from this change?

Detailed comments on the document

It is disappointing that images of the infrastructure in question has not been included to help aid understanding. This was suggested as part of the last consultation. Detailed dimensions of the infrastructure is also missing. This coupled with lack of images makes for a consultation whereby the impacts cannot be easily understood due to lack of accessible information.

Para 1 – these changes have been planned for a few years. This paragraph implies it is in response to the pandemic and is therefore misleading.

Para 5 says ‘Through the Code of Practice mobile network operators **can** provide more clarity on how mobile infrastructure will look and how it **can** be well-designed and well-built in a way that benefits people and communities’. Query the use of the word ‘can’. Why not ‘will’?

Para 19 – still no dimensions provided.

Para 47 – Code of best practice needs to be made a requirement and form part of the PD.

Para 49 – what is a major road? This needs defining. Is it all A roads? What about A roads that go through Article 2(3) land?

Para 81 – commitment to improve code of best practice welcomed, and involvement of protected landscapes welcomed. But this needs to be a requirement and form part of PD. What is the timeline for this update? It could be that these PD rights come in without an improved code of practice in place. The timeline for the review and amendment needs to be announced and completed before the PD rights come into place.

Para 85 – impact assessment does not mention environmental impacts of 5g and it does not mention the landscape impact of masts as a result of the changes – that some schemes will not need prior approval/planning permission, but could impact landscape.

It is not until the FAQs that it is stated that this will not apply to listed buildings and curtilage – only SSSIs have been mentioned. The FAQs say ‘the proposed changes will also not apply to land on or within sites of special scientific interest, to listed buildings and their curtilage, or sites that are or contain scheduled monuments’.

Organisation: Winterton Parish Council

Document: *To follow*

Due: July 2021

Status: Regulation 16

Proposed level: Planning Committee Endorsed

Notes

Proposed response

Summary of response

The Plan is welcomed, but concerns continue to remain about changes to national policy. Namely the change that small-scale rural exception sites or entry-level exception site proposals for affordable housing can be reasonably related/adjacent to development boundaries; national policy says adjacent to. No clear justification for the change to national policy is given. There is also concern about the wording of policies relating to protecting grade 1 and 2 agricultural land. There are also some concerns about the design policy and the character appraisal which is now part of the document and has been brought into policy.

Comments on the Neighbourhood Plan

Main concerns

- Para 37 – rural exception/entry level sites are required to be adjacent to development boundaries as stated in the NPPF. This paragraph implies that they can be further from the development boundary. We do not think this is the same as the NPPF, para 71b that says such sites need to be ‘adjacent’
- HO2 a and Para 38 – we maintain that we do not support the policy wording that says development can be away from the development boundary. The word ‘adjacent’ means next to or adjoining something else, and not away from something. We consider saying that sites can be ‘reasonably related’ to development boundaries is contrary to the NPPF. Further, this approach would be open to interpretation. A developer has the potential to interpret the meaning in a way that could see development proposals far from the boundary, thus resulting in the issues set out in para 37. It is not clear how need for a departure from national policy is proven.
- Policy E2 – I have just noticed that this refers to major development only. So, schemes of up to 9 dwellings or up to 0.49 Hectares, or up to 999.99 sq m could be allowed on grade 1 and 2 land. In a response to one of my comments relating to the 5 dwelling threshold used in some policies of this Neighbourhood Plan, you responded saying that the average scheme size is 5 dwellings (see section 3 of the original evidence document). So as this policy only applies to 10 or more dwellings, 0.5Ha or 1,000 sqm or larger, it could be argued that it may not actually apply to any development in the parish and so grade 1 and 2 land will not actually be protected. Is this the intention? Should the policy apply to all development? If my interpretation is correct, this seems

contrary to the Local Plan for the Broads. I do not know if it is different to the GYBC Local Plans and that may need checking.

- HO3

- This mainly deals with the built environment and architectural design. It doesn't really make any reference to landscape either in the policy text or supporting text. I think this is something of an omission and contrasts with the BA design policy which makes clear reference to the need for high quality landscaping.
- Para 41. *The Character Appraisal ... 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.* I don't feel that it fully achieves this. The Character assessment is mainly descriptive, focussed on the built environment, and doesn't include much analysis or identification of key issues/aims or characteristics which are valued and should therefore be protected or enhanced. For example, it identifies important views of key landmarks but doesn't offer any prescription such as the need to protect or maintain these views. As a result, its usefulness in policy terms is perhaps rather limited.
- A map to identify key views and landmarks would be helpful.
- In general, landscape is not dealt with in any detail. There isn't much coverage of natural features/trees/hedgerows and open space. Given that the plan area includes countryside around Winterton, it would be useful to have some consideration of the village setting and also the importance of the setting of the Broads.
- Could say 'Alterations or extensions to buildings of heritage value, whether in the historic village centre or not, should use traditional materials and designs'. And delete 'for roofs, chimneys, porches, elevations, windows, doors etc'.
- I have concerns that in tying this Character Appraisal to the policy, and because of its suggestion that buildings are 'very diverse', it may become harder to ensure that new development does reflect the predominant character and relate well to its immediate context.

- Character Appraisal – Appendix 1.

- I don't fully agree with the summary that states that the buildings are 'very diverse in terms of styles, heights and materials'. In terms of height they are predominantly 1 and 2 storeys. I'd also say that the predominant building material is red brick, with some flint, pebble stones and painted brickwork or render in the historic core – no mention of the render or painted brickwork is made.

- Could the Character Assessment expand on the boundary treatments in the village?
- Is there a Conservation Area Appraisal for the area that can also be referenced?
- The village has quite distinct areas containing different types of development and I wonder if the document could be developed to include 'character areas' that could be described?

Comments seeking clarity

- Para 33 says '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'. Do you mean for this to apply to all dwellings? Or do you mean for this to apply to one bedroom dwellings as well? It seems that the point is to require planning permission to extend, rather than make it permitted development and by missing out one dwelling houses in the sentence, they could be extended and you say that small housing is much needed. As worded, it does not seem that the threshold will meet the desired effect.
- HO3 – This seems to say that development in the village centre does not have to be of high environmental standards? Is that what is intended?
- HO3 - What kind of walking route and distance would be acceptable? We say 800m for a route that can be used all year round. Not necessarily lit though because of impact on dark skies.
- Para 55 says 'A 10% net gain will be applied unless a higher standard is required by the Environment Bill'. I wonder if it would be better to say 'Environment Act, when it is finalised' rather than referring to the Bill?
- Para 58 says that all development must demonstrate no increase in flood risk, but para 1 of policy E4 only applies to schemes of 5 or more dwellings. Is that threshold needed considering the concern locally and the supporting text referring to all development needing to not cause issues? Para 1 of E4 does say that the strategy needs to be proportionate.
- Policy E4 – a layout and formatting issue perhaps, but why are there bullet points? There does not seem to be an introductory sentence to the bullet points which is what I would expect. The first few seem to relate to the Surface Water Drainage Strategy, but the rest are about other things. They may be relevant and useful, but the format is confusing.
- Policy E4 – the last paragraph seems to refer to foul water drainage. Perhaps the title of the policy needs to say foul water drainage rather than just drainage? Reading the title as it is now, does not really say that the policy also talks about foul water

drainage. Could the two parts of the policy have sub titles? So, the first part is about surface water and the second is about foul water?

Typos and grammatical errors

- Para 43 says 'The socio-economic effects **of** second and holiday homes are being felt by the local community'.
- Policy numbering is a bit off – we go from E1 to E4.

General comments

- Number/letter all bullet points so they can be easily referenced by DM Officers.
- Policy E4 - last paragraph. We already cover this and set out a foul water drainage hierarchy. See Policy DM2 of the Local Plan.
- Add map of the SSSIs and CWS's as other assets, such as water and soils are mapped.
- Could a map of the potential biodiversity net gain sites or projects, or commitment to form a local action plan to identify these be mentioned. I note that a footpath connection project is mentioned, so adding the commitment for a biodiversity net gain project seem appropriate.
- Add in para 55 recognition that Winterton could potentially receive biodiversity net gain projects that occur from development outside of this neighbourhood plan area.
- In a couple of places in this document and some of the supporting documents, reference is made 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 that should be considered as part of the NP process? Other candidates for consideration would be the former Methodist Chapel on Beach Road, Corner Croft on Back Road and the row of mid-20th century thatched cottages along The Lane.

Comments on the evidence base

- This does not include the Broads' Landscape Character Assessment
- Not sure of the date of figure 16 and 17. Does that need updating?

Comments on the Basic Conditions Statement

- Figure 3 still includes the old HO1
- Concern about 'reasonably' adjacent still. That is not what the NPPF says and not what GYBC policy says.

Comments on evidence base update

I note that this updates parts of the original evidence base, that was dated 2018. However, I see that this update has not updated:

- housing numbers

- GP Practice resilience
- number on roll at the school
- the situation regarding the consultation on closing the school (though I appreciate this is covered in the main Plan).

Organisation: Worlingham Parish Council

Document: Worlingham Neighbourhood Plan, Regulation 14 version.

[Worlingham – The Official Website for Worlingham, Beccles, England](#)

Due date: 09 June 2021

Status: Regulation 14

Proposed level: Planning Committee Endorsed

Notes

The purpose of the Neighbourhood Plan is to guide development within the parish and provide guidance to any interested parties wishing to submit planning applications for development within the parish. The process of producing a plan has sought to involve the community as widely as possible and the topic areas are reflective of matters that are of considerable importance to the residents of Worlingham.

Each section of the plan covers a different topic. Under each heading there is the justification for the policies presented, which provides the necessary understanding of the policy and what it is seeking to achieve. The policies themselves are presented in the blue boxes. It is these policies against which planning applications will be assessed. It is advisable that, in order to understand the full context for any individual policy, it is read in conjunction with the supporting text.

Proposed response

Summary of response

Generally, the Neighbourhood Plan is welcomed. At this early stage, there are some areas that are confusing and clarification and checking is recommended.

General comments

- Where you reference other documents, it may be helpful to provide hyperlinks.
- Where there is a number like this ⁹, I tend to expect a footnote rather than a list at the end of the document – up to you, but a suggestion is to use footnotes as they save the reader having to scroll through to find what the number refers to.
- We strongly recommend that you contact the BA and ESC for a health check of the REG16 version – this will allow us to provide comments that may be useful to improving the Plan, prior to the last round of consultation. We will be happy to meet online.
- Throughout – other than saying ‘Waveney Local Plan’, it seems prudent to refer to East Suffolk rather than Waveney. Waveney Council is no more.
- Do you think you need to make it obvious which policies apply to the entire Parish and which to the Garden Neighbourhood and which apply to both?
- Throughout – when you say amenities, do you mean facilities? Would that be a better term to use?
- It would be useful if additional actions that are required to enhance this existing wildlife corridor and protect the dark skies are set out, even if they are subject to further detailed assessment. These could include adding ponds, nesting provision and habitat piles. If

further work is required to detail these actions, it would be useful to understand which bodies/groups will take forward the development of these actions.

Detailed comments

- 1.1 – and the Local Plan for the Broads.
- 1.2 – so did the Broads Authority.
- Map on page 5 needs to show the Broads Authority Executive Area
- In the part that talks about the spatial context, would it be prudent to talk more about the area that is the Broads and how the Broads has a status equivalent to a National Park?
- 2.66 – seems prudent to say that the Broads Local Plan does not have any policies specific to Worlingham. Although the strategic and development management policies will apply.
- Map at 4.3 – show the Broads Authority Executive Area on the map. Why is the newly designated industrial zone now shown? Could/should it be?
- 4.5 – is that a project? To liaise with them about this idea? Or did you want to allocate a site for this?
- Policy WORL1
 - Whilst it is good that you number/letter the bullet points (as this is useful for Development Management Officers when referring to policies used in their reports), you use A and a and B and b. I wonder if numbers or Roman Numerals might help make things clearer.
 - I do not understand what the policy is trying to do. How can development delineate the parish boundary? What would you like them to do? In b, do you mean duplicating or competing against existing facilities? I think the policy would benefit from being clearer in its intentions – you might benefit from asking for a Development Management Officer's input/interpretation of this wording.
 - WORL1 – how would you expect the applicant to do this? And for what level of development? Do you want this detailed in a design and access statement? But not all development needs a design and access statement. Do you want an application for replacement windows or a biodiversity scrape (for example) to need to do this? You may need to set a threshold – perhaps extensions, new buildings and change of use – just an example.
 - Does A b only relate to development for community facilities? If so, you might want to check the Waveney Local Plan policies as they may cover community facilities. Our policy is DM44 and SP16. And as above, you might want to specify to what development type the policy requirements relates to.
- Affordable Housing section – you may want to liaise with ESC Officers about what the announcement of forthcoming changes to affordable housing policy has on the scheme and your policy. Go here for more detail: [Government response to the First Homes proposals in "Changes to the current planning system" - GOV.UK \(www.gov.uk\)](#). The Secretary of State for Housing, Communities and Local Government will lay a Written Ministerial Statement before Parliament, in due course, which will outline changes to national planning policy in order to ensure First Homes are built.
- Policy WORL2
 - A document completed in 2017 is now 4 years old. It might be that the Neighbourhood Plan is not adopted until 2022. So that would be 5 years old. Is it

- best to update that document, so the Neighbourhood Plan is based on the most up to date evidence?
- Also, the other usual wording used in such circumstances is to add ...'or successor document' – these means that as and when you update it, the updated document will be relevant to the policy.
 - Did you want to add the hyperlinks to the documents as footnotes perhaps?
 - 5.17 seems to confuse affordable homes with M4(2) homes (which are accessible homes). You may wish to check what aspect of housing you are referring to as they are different. This also seems to repeat Waveney Local Plan policy WLP8.31 – Lifetime Design.
 - What does the photo on page 34 intend to demonstrate? You may want a caption.
 - Page 34 – is it prudent to talk about the setting of the Broads and how development needs to consider that? Especially given the proposed changes to the NPPF that increase the emphasis on the setting of protected landscapes.
 - Policy WORL4
 - Why such a high threshold? Many of these criteria seem applicable to schemes of 9 or fewer. Our design policies apply to all development and perhaps Waveney Local Plan ones do too – so could this threshold cause conflict between local plans and the Neighbourhood Plan?
 - Why only applicable to residential development?
 - I don't fully understand the requirements of criterion a.
 - Criterion g – what are amenity uses?
 - It may be prudent to have a criterion about respecting/not having a negative impact on the setting of the Broads.
 - 5.24 – Building for life 12 has been superseded by Building for a Healthy Life.
 - Policy WORL5
 - Criterion A says in general and generally in the same sentence.
 - What about the new Permitted Development right that allows upward extensions? Are you suggesting that schemes should not be allowed to do this PD right? You may want to speak to planners at ESC.
 - Policy WORL6
 - How would you expect lighting to be addressed? The Broads area has intrinsically dark skies that are protected through planning policy. By meeting these policy requirements, could there be more lighting? Perhaps you need to talk about that. Perhaps any lighting needs to be thoroughly justified and designed so as to not contribute to light pollution? Perhaps not on all the time?
 - Policy WORL7
 - Quite a long sentence. Wonder if it would benefit from being broken up.
 - Think there is some wording issues: '...must demonstrate that proposals to include dedicated sports facilities and other facilities **will be/are to be** designed to be...'
 - I am not 100% sure what you are trying to say. Is it that the MUGA needs to be designed to accommodate different sports to reflect the wishes of the community? I think the policy could be a bit clearer.
 - 7.8 seems to imply that insurance premiums and potential vandalism of the car owner are more important than speed of traffic with the associated benefits to the community. And these are reasons for setting the car parking standards. I wonder if this section needs rethinking as to me, pedestrian and cyclists' safety is key.
 - WORL9

- Kind of linked to the comment on 7.8 – could such recesses obstruct the obvious desire line and route for pedestrians as per criterion b?
- 7.13 – is this policy wording? It is setting a standard.
- 7.14 says ‘the issue’ – what is the issue?
- WORL12 and WORL14 and WORL16
 - To confirm, is it right that these policies only apply to the Garden Neighbourhood and no other development in Worlingham? As that is how it reads?
- 8.5, second sentence – does not read well. Would benefit from a check.
- 8.10-8.15 – it is unclear if the three satellite parks in Worlingham (All Saints Green, Woodfield Park and Werel’s Loke) are included within the wildlife corridor concept. If they are it would help if this corridor be shown on the map, even if this is provisional and indicative.
- 8.17 – what does NLP mean?
- 9.3 – the Local Plan for the Broads has a policy on SuDS as well.
- 16 – agree water runoff neutrality need to be achieved with existing issues. Could these potential SuDS sites be located on the map – are there suitable potential locations outside of the new development site that need to be acquired?