

**Consultation Documents Update and Proposed Responses**  
Report by Planning Policy Officer

<b>Summary:</b>	This report informs the Committee of the officers' proposed response to planning policy consultations recently received, and invites any comments or guidance the Committee may have.
<b>Recommendation:</b>	That the report be noted and the nature of proposed response be endorsed.

## **1 Introduction**

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

## **2 Financial Implications**

- 2.1 There are no financial implications.

Background papers: None

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Appendices: APPENDIX 1 – Schedule of Planning Policy Consultations received

## APPENDIX 1

### Planning Policy Consultations Received

<b>ORGANISATION:</b>	Strumpshaw Parish Council
<b>DOCUMENT:</b>	Strumpshaw Neighbourhood Plan
<b>LINK</b>	<a href="http://www.strumpshaw.org/articles.453/Master-Pages/Neighbourhood-Plan.html">http://www.strumpshaw.org/articles.453/Master-Pages/Neighbourhood-Plan.html</a>
<b>RECEIVED:</b>	3 July 2013
<b>DUE DATE:</b>	19 August 2013
<b>STATUS:</b>	Pre-submission consultation
<b>PROPOSED LEVEL:</b>	Endorsed by Planning Committee
<b>PROPOSED RESPONSE:</b>	<p>1. Spatial portrait could usefully include facilities/amenities in village, especially given that Strumpshaw PC want to maintain/improve these. There is also little mention of the businesses in the Parish (farming, garage, 2 livery yards). There is also no mention of community reserves. There is a newly planted woodland one, and all the existing path network goes beyond the references in the document as it stands.</p> <p>2. Page 5 – suggest amending reference to the area of the Broads to '<i>...The riverside area lies within the Broads Authority Executive Area...</i>'</p> <p>3. Just to clarify, the SAC, SPA, Ramsar Sites and SSSIs are international designations and not one which the Broads Authority Core Strategy allocates. The paragraph reads as though these sites are designated by the Broads Authority Core Strategy. This could usefully be clarified.</p> <p>4. Section 4 – vision. Suggest adding an explicit reference to biodiversity where the vision refers to marshes and nature reserves. The area is very rich in wildlife with high population of bats, swallows, marsh harrier etc as a result of being on the doorstep of the Broads.</p> <p>5. The opportunity to enhance the community space for wildlife should be considered within the policies relating to the new allotment and community buildings (nesting boxes, seeding nectar mixes etc).</p> <p>6. Policy 1 and 2. Potential to refer to the Broads Landscape Character Assessment, in particular areas 12 and 14. <a href="http://www.broads-authority.gov.uk/planning/landscape-character-assessment.html">http://www.broads-authority.gov.uk/planning/landscape-character-assessment.html</a>.</p> <p>7. Is there scope in having some kind of summary table after each policy and justification that refers to relevant Broads and Broadland policies in relevant documents as well as summarises in a sentence the findings of the SA? For example, in relation to Policy 1 and Policy 2 of the NP, DP1 and DP2 of the Broads Development Management Policies are of relevance and so too are CS1 and CS2 of the Broads Core Strategy. I understand a table is being produced to address the Basic Conditions in relation to local and national policy – perhaps this could be included in the Neighbourhood Plan.</p> <p>8. Suggest when referring to the Broads Authority Executive Area that Strumpshaw PC make the point that it is NP equivalent status (Section 3).</p>

	<p>This will help with implementation of Policies 1 and 2.</p> <p>9. Policy 3 – the justification is not clear in saying its reasons for choosing the policy approach.</p> <p>10. Policy 4. The supporting text refers to the 10 dwellings as being ‘exceptions to the settlement limits’. This could be interpreted as being an Exception Site. Exception Sites are referred to in the NPPF at paragraphs 54 and 55 which says that these sites are to be mainly affordable housing with some market housing. Colleagues at Broadland District Council seem to think that the use of the term ‘exceptions’ is erroneous and the site is not intended to be an Exception Site. It is recommended that Strumpshaw PC clarify the policy and supporting text in light of these comments.</p> <p>11. Policy 5. The justification does not seem to be linked to the policy.</p> <p>12. Policy 8 is another example where reference to relevant policies in Local Plans may be beneficial – for example DP21 and DP28 of the Broads Development Management DPD.</p> <p>13. Should flood risk and other constraints be shown on a map?</p> <p>14. Page 27 – water use is important to the Broads. Strumpshaw Parish Council may wish to consider adding a bullet point in relation to water efficiency to the housing section.</p> <p>15. There does seem to be a bit of a lack of reference to the historic environment generally although the church is discussed in detail in relation to a future extension to provide toilet and other facilities. The area within the plan does contain a number of historic buildings including Listed and Non Listed assets. Examples include (within or partly within the BA area) the Strumpshaw Hall complex and parkland, the railway buildings, drainage pump features and the historic ferry crossing amongst others. It may not be appropriate to list the structures individually in this document especially as it is cross border but a paragraph making reference to the Historic Environment and its contribution to the area and settlements in the spatial portrait should be included. Something like “The area of the plan contains a number of historic buildings and features which not only form part of the character of the area today but also catalogue the development of the area and historic land uses over time.” Then in the spatial analysis or as a policy later in the document something like “Historic features which are considered to make a positive contribution to the character of the area should be retained and protected from inappropriate development.”</p> <p>16. As an aside, the BA has a local list of Heritage assets and would consider nominations from the Parish (within the BA executive area) for buildings they feel are worthy of inclusion on that list. We have recently written to the Parishes regarding this and would be happy to provide further info including the criteria for selection and work with the Parish in developing this if they are interested.</p> <p>17. In the SA, there is reference to ‘Broads Authority Policy SAX’. The Broads Authority does not have any Development Plan Document policies beginning with the prefix ‘SA’. The Core Strategy starts with CS and the Development Management DPD starts with DM. The Sustainability Appraisal Objectives start with ‘SA’ however. It is suggested that Strumpshaw PC clarify the reference to the Broads Authority’s policies or objectives.</p>
<b>NOTES:</b>	<p>The remaining steps of producing the Neighbourhood Plan are:</p> <ul style="list-style-type: none"> <li>• Pre-submission publication by the Local Planning Authorities.</li> <li>• Examination of the Neighbourhood Plan.</li> <li>• A referendum on implementing the Neighbourhood Plan.</li> </ul>

<b>ORGANISATION:</b>	Broadland District Council
<b>DOCUMENT:</b>	Site Allocations Development Plan Document
<b>LINK</b>	<a href="http://www.broadland.gov.uk/housing_and_planning/3122.asp">http://www.broadland.gov.uk/housing_and_planning/3122.asp</a>
<b>RECEIVED:</b>	1 July 2013
<b>DUE DATE:</b>	2 September 2013
<b>STATUS:</b>	Preferred Options
<b>PROPOSED LEVEL:</b>	Endorsed by Planning Committee
<b>PROPOSED RESPONSE:</b>	<p><u>Comments on Maps</u></p> <ul style="list-style-type: none"> <li>• It is difficult to read the reference numbers of the sites on the maps.</li> <li>• Colour of the Broads is similar to that referred to as 'specific policy'. Could this be changed?</li> <li>• The Settlement Limit and boundary of Preferred Options sites are red lines. At the moment it is not clear if the allocation is within the existing settlement boundary or will result in a change to the SB. Could the maps be clarified in this regard?</li> <li>• It is recommended that all the maps show the Broads Executive Area – at the moment, the more detailed maps showing individual allocations do not show the Broads Executive Area.</li> </ul> <p><u>Comments on DPD</u></p> <ul style="list-style-type: none"> <li>• 3.31 – part of TSA is also in the Broads Exec Area and as such, is subject to 4 policies in the Sites Specifics DPD for the Broads. These cover Cary's Meadow, Griffin Lane, Bungalow Lane and development boundary. Also referred to below under SA, the BA would prefer to see something in the policy about mitigating against visual impacts on Broads area. These potentially could result from prominence of buildings on valley side, height and lighting.</li> <li>• Page 52 – There are policies in the Broads Sites Specifics which refer to the riverside area of Brundall.</li> <li>• Map on page 52 –How many dwellings likely to be delivered?</li> <li>• Page 104 – Broads Sites Specifics is promoting a cemetery and playing field allocation. Also referred to below under SA, one of the Acle allocations abuts Broads area and a such visual impacts of development in relation to Broads area considered and mitigated.</li> <li>• Page 128 – is it intended that there be a Travel Plan to promote sustainable travel, or a Transport Assessment to understand the traffic implications of the development, or indeed both? This is not clear in the policy as written. The wording in the policy combines both documents. From discussions with BDC Officers it seems that the policy is intended to say that a Transport Assessment and Residential Travel Plan are both required. This could usefully be clarified. Also referred to below under SA, the Broads boundary very close and Caen Meadow is the closest area for public access (and forms</li> </ul>

	<p>part of a policy in the publication version of the Broads Sites Specifics DPD). Impacts on this recreational resource need to be considered.</p> <ul style="list-style-type: none"> <li>• Page 170 - the Broads Sites Specifics proposes to remove the SB from Reedham. The proposal seeks to bring further development close to the Broads Exec Area. Also referred to below under SA, the landscape and visual impacts on the Broads will have to be considered as the allocation is right on Broads boundary and the impact on the landscape and biodiversity robustly assessed. It is therefore recommended that the policy and guidelines for this policy be improved in their reference to the Broads and assessment of any impacts on the Broads. Wording similar to that quoted from the SA and copied below which is strong in its intentions should be considered for inclusion. It is also recommended that the Broads Authority are involved at the earliest possible stage in the planning of this allocation.</li> </ul> <p>The BA has received a representation on this allocation from a third party, who is suggesting an alternative site to the north, which is adjacent existing housing and accessed off an existing cul-de-sac. The alternative site, which would be further from the BA boundary, has some merit, however this is a matter for BDC.</p> <p>See comments on SA below that are additional to the above which could be considered for the DPD.</p> <p><u>SA Main Document</u></p> <ul style="list-style-type: none"> <li>• Map on page 23 shows Broads as Urban area</li> <li>• Page 30 bottom – Broads is renowned for its biodiversity, <a href="http://www.broads-authority.gov.uk/managing/broads-biodiversity-action-plan.html">http://www.broads-authority.gov.uk/managing/broads-biodiversity-action-plan.html</a></li> <li>• Page 31 top – Water quantity as well – impact of extraction.</li> <li>• Page 31 middle – Broads is renowned for its landscape character. Reference to the BA's Landscape Character Assessment could be useful: <a href="http://www.broads-authority.gov.uk/planning/landscape-character-assessment.html">http://www.broads-authority.gov.uk/planning/landscape-character-assessment.html</a></li> <li>• Page 31 bottom - the Broads will be impacted by Climate Change in relation to sea water incursion and flooding. <a href="http://www.broads-authority.gov.uk/managing/climate-change.html">http://www.broads-authority.gov.uk/managing/climate-change.html</a></li> <li>• Page 34 bottom – Broads is an area of cultural heritage and recreation and an area for quiet enjoyment <a href="http://www.broads-authority.gov.uk/visiting.html">http://www.broads-authority.gov.uk/visiting.html</a></li> <li>• Page 37 top – important to acknowledge potential landscape impact of some renewable technologies and supporting infrastructure.</li> </ul> <p><u>SA Appendix A</u></p> <p>Reedham assessment:</p> <ul style="list-style-type: none"> <li>• ENV4 assessment does not appear to be well reflected in the policy. The text refers to the adjacent wetlands of national importance and are environmentally sensitive areas and also that there is potential for harm. It</li> </ul>
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	<p>is recommended that such wording is included in the policy or the guidelines for the development.</p> <ul style="list-style-type: none"> <li>ENV5 says '<i>Views from the Broads Authority area may be impacted upon, so this will have to be addressed. Landscaping and roof heights could become important details to resolve at the planning application stage to mitigate harm</i>'. The policy or guidelines could therefore reflect the Broads in its wording to reflect the SA assessment.</li> </ul> <p>Thorpe St Andrew assessment:</p> <ul style="list-style-type: none"> <li>Map on page 737 shows different land allocations to the actual DPD. Has the area to the south been removed as a result of ENV7 assessment? If so, this could perhaps be mentioned in the SA assessment.</li> <li>ENV4 - mentions potential to impact areas of the Broads. Recommend that the strong wording in the assessment be included in the policy or guidelines: '<i>Development must ensure there is no detrimental effect on the River Yare and the Whitlingham Marsh</i>'.</li> <li>ENV5 – similar to the above, recommend that the strong wording in the assessment be included in the policy or guidelines: '<i>Development in Thorpe St Andrew must ensure there are no detrimental effects on environment, heritage or areas designated of landscape importance</i>'.</li> </ul> <p>Brundall assessment</p> <ul style="list-style-type: none"> <li>Page 192 – The Settlement Boundary assessed in the SA looks different to that proposed in the DPD. It is understood following discussions with BDC Officers that the Preferred Option reflects the negative scorings in the SA and will be subject to SA in the next iteration of the DPD.</li> </ul> <p>Acle Assessment</p> <ul style="list-style-type: none"> <li>PO 01 04</li> <li>The SA refers to PO 01 04 as ACL1 and the map on page 7 says it is to be deleted, yet it is in the DPD. It is understood following discussions with BDC Officers that the allocation is to be saved and will be appraised in the next iteration of the DPD.</li> <li>ENV5 – refers to previous Broads' comments relating to the banking, but this is not included in the policy.</li> <li>ENV8 – states that AWS have concerns regarding the water supply, but this is not included specifically within the policy itself.</li> </ul> <ul style="list-style-type: none"> <li>PO 01 02</li> <li>ENV4 and ENV7 – The wording in the assessment provides detail which could be included in the policy or guidelines.</li> </ul> <p>Wroxham Assessment</p>
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	<ul style="list-style-type: none"> <li>The land allocation assessed in the SA is different to that shown in the DPD. It is understood following discussions with BDC Officers that the allocation will be appraised in the next iteration of the DPD.</li> <li>ENV4 - mentions potential to impact areas of the Broads. Recommend that the strong wording in the assessment be included in the policy: '<i>Development in Wroxham must ensure there are no detrimental effects on important sites of biodiversity and geodiversity</i>'.</li> <li>ENV5 - mentions the sensitive landscape setting. Recommend that the strong wording in the assessment be included in the policy: '<i>Development in Wroxham must ensure there are no detrimental effects on environment, heritage or areas of designated landscape importance</i>'.</li> <li>ENV9 and SOC5 – refers to the movement of football fields, but this is not mentioned in the policy and SOC1 refers to 300 homes, but the policy refers to 100 homes. It is understood following discussions with BDC Officers that this reference refers to the previous land allocation for the area, but it is now intended to allocation land for 100 dwellings (a smaller land area) and that the fields will not need moving.</li> </ul> <p><b>South Walsham Assessment</b></p> <ul style="list-style-type: none"> <li>ENV 2 assessment raises issues regarding surface water. Recommend that the strong wording in the assessment be included in the policy.</li> <li>ENV 4 - Recommend that the strong wording in the assessment be included in the policy: '<i>Development in South Walsham must ensure there are no detrimental effects on important sites of biodiversity and geodiversity</i>'.</li> <li>ENV5 - mentions the sensitive landscape setting. Recommend that the strong wording in the assessment be included in the policy: '<i>Development in Wroxham must ensure there are no detrimental effects on environment, heritage or areas of designated landscape importance</i>'.</li> <li>SOC 2 – the scheme could lead to loss of a play area. It is understood following discussions with BDC Officers that negotiations regarding the provision of a play area to replace that lost are to be held.</li> </ul> <p><b><u>SA Appendix C Literature Review</u></b></p> <ul style="list-style-type: none"> <li>The Literature Review could usefully review the following Broads Authority documents: <ul style="list-style-type: none"> <li>Broads Core Strategy (adopted 2007)</li> <li>Broads Sites Specifics (second publication, July 2013)</li> <li>Broads Landscape Character Assessment</li> <li>Broads Biodiversity Action Plan</li> </ul> </li> </ul> <p><b><u>HRA</u></b></p> <p>It is understood that the HRA will be completed for submission. The Broads Authority would be interested in reading the HRA.</p>
<b>NOTES:</b>	The next stage of producing the Sites Allocations DPD will be the pre-submission publication of the DPD before it is submitted to the Planning Inspectorate.