

# Planning Committee

28 April 2023

Agenda item number 10

## Consultation Responses

Report by Planning Policy Officer

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### Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently and invites members' comments and guidance.

### Recommendation

To note the report and endorse the nature of the proposed response.

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## 1. Introduction

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

Author: Natalie Beal

Date of report: 11 April 2023

Appendix 1 – Planning Policy consultations received

# Appendix 1 – Planning Policy consultations received

## Reedham Parish Council

**Document:** [Reedham Neighbourhood Plan](#)

**Due date:** 29 April 2023

**Status:** Regulation 15

**Proposed level:** Planning Committee Endorsed

### Notes

#### Vision

Reedham is a vibrant community that retains its rural identity which is cherished by local people and tourists. Any future development will be sensitive to the rural nature of the settlement as well as the beauty and tranquillity Reedham has to offer. Development will be of a high-quality design and tailored to meet the needs of the local community.

#### Objectives

- A. Ensure future housing development meets the needs of local people.
- B. Protect and enhance Reedham's natural environment, its green spaces, trees, hedgerows, waterways, and marshland that are important for wildlife.
- C. Protecting the open landscape and the spectacular views, tranquillity, and dark skies the parish has to offer.
- D. Support regeneration of the riverside in a way that protects its special environmental qualities.
- E. Encourage local jobs, services and facilities that provide employment opportunities to local residents and attract visitors to the village.
- F. Protect and enhance important community facilities including recreational opportunities that are accessible to all ages.
- G. Reduce the impact of on-street car parking and ensure sufficient off-street parking is provided with new development.
- H. Reduce the impact of flooding and ensure that surface water flood risk is not worsened through new development.

### Proposed response

#### Summary of response

The Plan is welcomed. The comments relate to clarification mainly, but Policy 14 seems contrary to the NPPF.

## Detailed comments

### Neighbourhood Plan

- Do the images have alt text for screen reading and accessibility purposes?
- Para 12 – ‘Local Plans’
- Para 16 ‘In the emerging **Greater Norwich** Local Plan...’
- Para 29 – ‘Local Plans’
- Page 11 to 20 – there is no need to repeat the policies here. It adds ten pages to the document and without their supporting text, they will be read without the necessary context. Perhaps list the names of the policies and their page numbers, but I don’t you should repeat the policies. Also makes it difficult if you make a change to a policy in one place and then forget to make the change in the other.
- Para 35 – policy 5 of which document?
- More 2021 Census information is released now and there may be some data relating to the Plan, rather than relying on the 2011 Census.
- Some pieces of data are from 2021 and it is now 2023.
- Figure 10 says the date of the data is 2020, yet Policy 2 says the document’s date was 2022. Can the dates be clarified?
- Policy 2 – what is the reason for excluding conversions from this policy requirement?
- Policy 2 – by saying ‘3 bedrooms or fewer’, I would suggest the developer will go for three bedrooms. Yet your data indicates more new housing should be 2 bed rather than 3 bed. To me, as written, I don’t think the policy represents the evidence. You may want to check and maybe explain things a bit more?
- Para 52 – perhaps say, maybe in a footnote, that the BA have regard to/defer to the thresholds and standards of the relevant district, although do seek off site contributions for schemes of 6-9 dwellings.
- Para 53 – suggest a footnote that says First Homes cannot come forward in the BA Executive Area.
- Policy 4 – says this applies to all new development – so schemes like new windows or signs? You may want to check the threshold for this policy.
- Policy 4 f – says ‘improve net gain’ – would ‘provide net gain’ be better?
- Para 67, last sentence – if this is the Greater Norwich Local Plan, suggest you say that.
- Para 70 – says ‘the Local Plan’ – which one? Or should it be ‘plans’?
- Policy 6 – last few words – when you say deep, do you mean under the ground? You might want to check what you mean/write.
- Para 81 – BNG will be a requirement from November 2023, although small sites has been delayed until April 2024.
- Policy 7 – for your information, the Examiner removed the BNG 10% requirement from Hemsby Neighbourhood Plan – you may wish to look into that and see if you need to change your policy if you wish the standard to remain. Equally, BNG standard of 10% has remained in some other made Neighbourhood Plans.
- Policy 7 – how did you want people to show BNG of 10%? Using the most up to date Metric? Did you want to say that?
- Para 102 – says ‘there’s a probably of 1 in 1000 of flooding’ – probability

- Policy 14 – promoting town centre uses in redundant farm buildings appears contrary to the NPPF and local policy. Para 87 for example of the NPPF says town centre uses should be in the town centre. And then the glossary on page 68 says what a town centre use is and that list is very similar to Class E uses. I would suggest that this policy needs to be checked for consistency with local and national policy as it seems contrary to it at the moment.
- Policy 14 – the first sentence says that extensions to redundant farm buildings will be looked on favourably, but shouldn't that refer to being subject to other development plan policies as perhaps the design and impact on landscape as well as works and impact on, say, roosting bats all are important considerations.
- Policy 15 – you mention in the text the issue of a lack of standard for cycle parking for pupils – do you want to address that so that any development at the school needs to ensure cycle spaces for pupils?
- Policy 15 – you don't mention scooting in any of the policy or supporting text – lots of children scoot to school and as such, do you need to have mention of the need for scooter parking?
- Policy 15 – I read the policy and it is mostly about finding extra cycle provision for the school, with one small line about elsewhere in Reedham. I wonder if this policy is really clear in to what and where it applies?
- Community Action 4 – it sounds like a school travel plan needs to be produced or if there is one, improved and implemented. Should the Community Action refer to school travel plans?

#### SEA and HRA

- This document quotes data from the evidence base – some evidence is a few years old now and should be updated.

#### Design Code:

- Do the images have alt text for screen reading and accessibility purposes?
- Section 4.6 onwards seem to be relevant to all development in the Broads, but is under the chapter that starts only talking about the two allocated sites. You may need to make it clear which bits are relevant to the entire Reedham area and which bits are only relevant to the allocated sites

#### Evidence Base:

- The document is dated 2022. I would suggest it needs updating for the next version.
- For example, more 2021 Census information is released now and there may be some data relating to the Plan, rather than relying on the 2011 Census.
- Other pieces of data are from 2021 and it is now 2023.
- Did you want to include parts of the emerging Greater Norwich Local Plan as well as the 2015 plan?
- Do you need an OS Copywrite for the maps?
- Do the images have alt text for screen reading and accessibility purposes?