

Planning Committee

5 December 2025

Agenda item number 9

Consultation responses

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.

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Date of report: 25 November 2025

Appendix 1 – [Essex and Suffolk Water – Water Recycling, Transfer and Storage Project](#)

Appendix 2 – [Greater Norwich Authorities - Draft Policy 2: Sustainable Communities SPD](#)

Appendix 3 – [Greater Norwich Authorities - Draft Implementation of the Greater Norwich Green Infrastructure Strategy SPD](#)

Appendix 4 – [Broadland and South Norfolk Design Code SPD](#)

Appendix 1 – Essex and Suffolk Water – Water Recycling, Transfer and Storage Project

Essex and Suffolk Water

Document: [Suffolk Water Recycling Transfer & Storage Project \(suffolkwaternetwork.co.uk\)](http://suffolkwaternetwork.co.uk)

Due date: 10 December 2025

Status: Non statutory consultation

Proposed level: Planning Committee endorsed

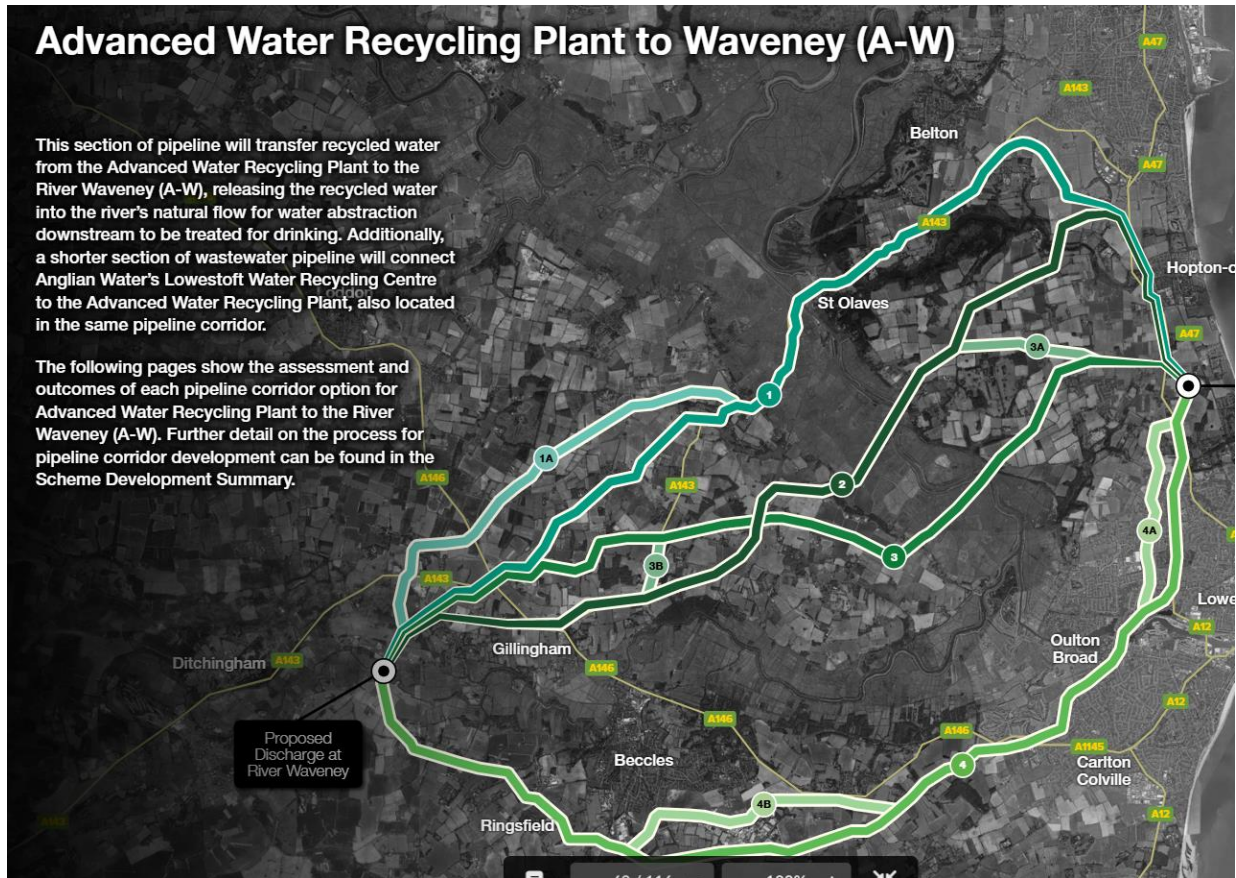
Notes

This consultation seeks feedback on:

- The proposed location of a new **Advanced Water Recycling Plant** in Lowestoft
- The proposed locations for two **service reservoirs**, one close to the existing Lodgewood Water Tower near Sibton and one near Eye airfield
- The **pipeline corridors** connecting these key infrastructure components



The Suffolk Water Recycling, Transfer and Storage Project is made up of two key elements, the development of a new Advanced Water Recycling Plant, capable of producing 11 million litres per day of purified recycled water, and strategic network enhancements that will support a more reliable and resilient water supply for the region.



Proposed response

Summary of response

Generally, there is a lack of detail about the construction of the project. There are no case studies or before, during and after photos from similar schemes to give an idea of how things will work and look.

Comments

- Do we know if it would potentially be used to supplement flow on the Waveney during periods of drought and/or during storm surge events to push back saline water?
- Where the pipeline goes under the Broads navigable waterways, a works licence will be required and the designed depth of the pipeline below the riverbed needs to be appropriate. See [Works Licences](#).
- None of the maps make the Broads Authority executive area obvious. The Broads is a protected landscape with a status equivalent to a National Park and needs to be shown on maps. The Broads has the highest status of protection in landscape terms.
- There does not seem to be anything about how you intend to cross the rivers. There is nothing to show what things will look like where the pipe goes down to then go under the river and then back up. There is nothing to show what the construction process will look

like. How far below the ground/river will the pipes be? What will be the scar in the landscape? What will you do with the excavated material that could be peat? What is the corridor for construction – without knowing that and what that could typically look like, it is hard to give comments on the route. If, say, the construction period lasts a few months and there may be a scar for a few months after that before the vegetation that was there beforehand takes hold again and so after like 6 months you won't be able to tell anything is there, that is one thing. But, say, there is some kind of permanent structure at the points where the pipes go down to go under the river and then another when it comes back up and these structures are obvious in the landscape and need parking and fencing then that is another situation. Or if there will always be a mown grass covered route of the pipes to enable access, that is different to what was there. Will there be manhole covers at regular routes to enable access?

- Page 99 - is that what we are to expect through the Broads? What is the after image if that is during the construction - as in, a few months after the work, what does it look like? It does not seem very deep down, so what are we expecting? This is just included as artwork and not as an annotated demonstration as to what to expect.



- Also page 107 – similar – that is a big scar and does not seem very deep. This image is during construction, but what is the after image like? This is just included as artwork and not as an annotated demonstration as to what to expect.



- Where have you made a route under a river before this and what was the impact? Could there be land slumping as a result of putting a pipe under the river? Will there be impacts on navigation?
- This is all that is talked about in the consultation documents: [SWRTS QandA.pdf | Powered by Box](#) – there needs to be much more. Before, during and after images, maybe cross section diagrams, maybe short videos, maybe case studies of where this has been done before:

How will the pipelines be built, and what disruption should I expect?

Most pipes will be installed using open-cut excavation: digging a trench, laying the pipe, and reinstating the land. Where roads, railways or rivers are crossed, trenchless methods such as tunnelling may be used to minimise disruption.

*You may notice some **temporary noise, dust or traffic**, but we'll use modern equipment and best-practice methods to reduce these as much as possible. We'll also monitor conditions closely and keep local communities informed.*

*Your **water supply will not usually be affected**. If short-term work ever requires a brief interruption, we'll let affected customers know in advance.*

- Where routes pass through peatland and involve excavation or vehicle tracking, the following impacts must be considered:
 - Carbon emissions resulting from peat disturbance

- Compression of the peat soil structure and associated effects on water transmissivity and ecological function
- Summer drying of peat wetlands: Peat wetlands in the Broads are experiencing significant summer drying. Current water-regulation and abstraction pressures mean there is insufficient water available to support wetland enhancement or maintain summer water levels, which increases landscape-scale ecological and carbon-related risks.
- Opportunity for multi-benefit water supply to peatland restoration: The potential for providing water to peatland restoration projects in the Beccles, Worlingham, Geldeston and Barsham area should be considered as part of the investigation, given the multiple environmental benefits.
- Engagement with the Broads Peat Partnership: The Broads Peat Partnership is meeting at 10:00 on 7 January 2026. We would welcome a representative to attend in order to gain a better understanding of these issues.

Appendix 2 – Greater Norwich Authorities - Draft Policy 2: Sustainable Communities SPD

Broadland, Norwich and South Norfolk Councils

Document: Draft GNLP Policy 2 Sustainable Communities Supplementary Planning Document (SPD) available at [Supplementary Planning Document consultations | Norwich City Council](#).

Due date: 19 December 2025

Status: Draft SPD

Proposed level: Planning Committee endorsed

Notes

The Policy 2 SPD will support Greater Norwich Local Plan (GNLP) Policy 2 with the aim of making sure that new developments contribute to the creation of resilient, inclusive, and sustainable communities.

GNLP Policy 2 requires applicants of major developments to submit statements on sustainability, master-planning, timescales for delivery and health impact assessments. The SPD provides guidance on how to write these statements and covers the ten key issues within Policy 2: access to services, new technologies, green infrastructure, densities, design, inclusive and safe communities, environmental protection, flood risk, water efficiency, and energy consumption.

Proposed response

- For the Part 1 on access there should be a requirement to explain how it fits with the LCWIP.
- There should also be explicit consideration of how sustainable access is given to recreational facilities, particular for villages that overlap with the Broads.
- Part 5 on Design under Information required to demonstrate compliance (column 3), we suggest an additional bullet point:
 - The setting of the protected landscape of the Broads Authority Executive Area where development may affect it.
- Part 7 on Environmental Protection should consider presence of peat soils.

Appendix 3 – Greater Norwich Authorities - Draft Implementation of the Greater Norwich Green Infrastructure Strategy SPD

Broadland, Norwich and South Norfolk Councils

Document: Draft Implementation of the Greater Norwich Green Infrastructure Strategy Supplementary Planning Document (SPD) available at [Supplementary Planning Document consultations | Norwich City Council](#)

Due date: 19 December 2025

Status: Draft SPD

Proposed level: Planning Committee endorsed

Notes

This draft SPD supports the delivery of high-quality, multifunctional green infrastructure. It provides guidance for developers, planners and communities on how to use the Greater Norwich Green Infrastructure Strategy to implement GNLP policies 2, 3, 4, 6 and 7.

Proposed response

- 1.1 – It applies to the administrative **Local Planning Authority** areas of Broadland District Council, Norwich City Council, and South Norfolk Council.
- As this is a planning document, rather than saying ‘Broads National Park’, please say ‘Broads Authority Executive Area’.
- What are the instructions for developers within this SPD? It is not clear what they are to do.
- GI Strategy seems to cover the Broads. How should we be involved? Endorse the SPD?
- Page 7 Blue spaces are shown annotated on the map. Do you need to set out what a ‘blue space’ is? Maybe you need a glossary?
- Page 14 – last para: it would be good to be able to promote the area’s heritage in the delivery of some of the projects mentioned (for example, Burgh Castle and Caistor Roman town are both mentioned – as well as others such as Whitlingham Country Park, Ladybelt Country Park, Earlham Park – all have heritage designations). As such other partners might include heritage organisations such as the Norfolk Archaeological Trust, Historic England etc. The promotion of heritage in some of these projects would provide many benefits, including potentially additional funding opportunities.
- Page 17 Active Places – last bullet point – heritage sites could be included in the list of places that could be explored to provide accessible green spaces

- Page 21 – gives the number of listed buildings as 116 – is this just the number in the Greater Norwich area as the Broads contains 279 listed buildings? Again is the number of CAs given (18) just those in the Greater Norwich area as there are 25 in the BA area?
- Page 21 – Industrial heritage – this also includes historic water management structures such as the dyke network and collection of drainage mills in the Halvergate Marshes Conservation Area, used to drain the land to enable its use for grazing
- Page 22 – reference to Broads LCA – state currently being updated?
- Page 32, second column – if this is the RAMS scheme then that needs to say that as that is what it is known as.
- Page 34, urban tree canopy cover standards box – formatting issues.

Appendix 4 – Broadland and South Norfolk Design Code SPD

Broadland and South Norfolk Councils

Document: [South Norfolk and Broadland Design Code Supplementary Planning Document \(SPD\) | Broadland and South Norfolk](#)

Due date: 8 December 2025

Status: Draft SPD

Proposed level: Planning Committee endorsed

Notes

The draft Design Code SPD has been developed to support the delivery of high-quality residential development throughout South Norfolk and Broadland. By setting out clear design expectations, the SPD aims to ensure that new homes and neighbourhoods are attractive, practical, and sensitive to the unique character of our towns and villages. This work has been funded through the Government's Planning Skills Fund and led by expert consultants, with input from Council planning teams and local stakeholders.

The preparation of the Design Code involved extensive informal engagement, including three previous stages of public and stakeholder input. Insights from these stages have helped to shape a practical and locally relevant document. The current consultation represents the final opportunity for all interested parties to contribute before the documents are adopted.

Supporting the Design Code are two key documents: the Broadland Character Assessment, which describes the distinctive features of Broadland's built environment and landscapes, and the Assessment Framework, which provides structured prompts for evaluating the quality of development proposals. Together, these documents are designed to help residents, planners, and developers achieve better outcomes for our communities. The existing South Norfolk Character Assessment (formerly included in the South Norfolk Place-Making Guide SPD) will also form part of the final Design Code.

Proposed response

Summary of response

Generally, there needs to be better reference to the Broads and its setting throughout the documents.

Design code

- Page 2 and Page 11 – the Broads Authority Executive Area is shown on the maps on these pages but there is no explanation as to why and it may not be obvious to users of the document. It needs to state at the beginning of the document that the BA is the LPA for their area and have a separate Design Guide and Code SPD for the BA area. Also, that the Broads is a protected landscape with equivalent status to a National Park and set out the

special considerations (para 189-190 of the NPPF) in order to fulfil the Councils' duty contained in the LURA, section 245.

- Page 9, green column – recommend it says ‘...well-designed lighting (where appropriate)...’
- Page 10, a minor point – the images don’t really match the text (which is about climate change)
- Page 13 – should this page also include ‘Promotion of active travel, with pedestrian and cycle routes provided.’?
- Page 14&15 – Dispersed Settlements and Countryside & villages should still give consideration to public transport access, even if it is via a cycle or pedestrian route as a multi-modal journey.
- Page 15 – could this be seen to say that dwellings in open countryside are acceptable? Would it be better to just say this section is about smaller settlements?
- Page 22 – Active travel includes “wheeling” to take account of alternative forms of cycle and wheelchair use – this is included in N1.3 but should also be referenced in the headline
- Page 23, under the coloured boxes, it includes a key for the colours. It seems more user friendly if, above each orange/red box the title was ‘applies to all schemes’ and above the purple box ‘applies to schemes of 10+ dwellings’ – this means that people don’t need to remember what the colours mean and so the codes can be applied to the scale of development intended.
- Page 27 – image shows pavement parking... I know this section is about local townscape and landscape and incorporating features, but it shows cars parked on pavements and it might be interpreted that is supported and good practice.
- Page 29 – is it worth having a ‘for example’ relating to the second part of N5.4? It is not clear what the second part of N5.4 means in practice: *should also adopt other measures, such as landscape, to relate it to the surroundings.*
- Page 43 – talks a lot about flooding when the section is about nature and biodiversity. N16 for example seems to need its own section.
- Page 54, S5 – maybe mention pavement parking?
- Page 54 – s5.8 does not really say anything.
- Page 61, section 5.2 – large areas of glazing to let in daylight is one thing, but light pollution from these large, glazed areas needs to be mitigated through the use of blinds or curtains. If the glazed areas are out of easy reach, there may be a need for automated dusk to dawn blinds.
- Page 63 – cycle storage. This comes after car parking and bin storage sections in the Code. Given all that is said throughout the Code about promoting active lifestyles and travel, it seems logical to place this earlier in the document to get across how important this is.

- Page 63, image with yellow door – is that actually cycle parking? Or something to stop the door swinging too far open? I would question how secure this type of cycle parking is. One would likely opt for back garden shed as cycle parking or maybe even take the bike inside if this is the only option provided. How useable and secure is this? Query use of this as a good example.
- H4.1, 4.2, 4.3 – query why H4.3 is a must – as in a destination must have good cycle parking. Whereas the origins of journeys (houses) only should have good cycle parking. Also, the start of the section says ‘functional and accessible cycle storage is important so that residents find it convenient to use a bike’ so saying ‘should’ in H4.1 and H4.2 does not follow on from the introduction.
- Page 63, cycle parking – there is no mention of shelter over the cycle parking. There is no mention of what you mean by overlooked. There is no mention of CCTV. There is nothing about the type of cycle parking – Sheffield Stands. And nothing about the cycle parking being on flat and level surface.
- Page 75, section 5.8 – perhaps this should be earlier in the document given how pressing climate change is.
- Page 76 – H15.2 & 15.3 – These both show as “should” – whilst the Future Homes Standard is not in force until December 2026, in the interim these should be strengthened to try and prevent a rush of fossil heating systems being installed.
- There is little or no mention of the Broads. Design of schemes could impact on the setting of the Broads.
- 3.1 creating a safe and connected movement network – should reference the Countywide LCWIP and the Broads LCWIP – in particular when sites straddle them.
- 4.2 Streets for walking, cycling and interacting
 - Should include reference to wheeling
 - Should reference LTN 1/20 (for urban settings) or the upcoming Active Travel England Rural Design Guide.

Broadland Character Assessment

- Page 19 – suggest a map is included that shows the areas to which these Character areas apply. See page 27 of the South Norfolk Character Assessment as that does show a map.
- Pages 22 and 23 don’t mention that the Broads has a status equivalent to a National Park.
- Page 22 and 23 images don’t really reflect the Broads – there are no river scenes or boatyards included for example. Given it is a landscape assessment you should also show more wider landscape images containing views of the river.

- Page 27 – not sure why the map is zoomed out so much. Would be better to zoom in to Broadland. See page 31 of the South Norfolk Character Assessment as the equivalent image is zoomed to a good scale.
- Page 27 – All the Broads that is within Broadland needs to be coloured in. The NPPF is clear in paragraph 189 about the setting of the Broads. Indeed, this document says at page 4 ‘Prior to appraising a development site and its immediate setting, it is essential to understand its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change’ – given that the Broads is a protected landscape with a status equivalent to a National Park, it is not clear why the Broads Authority Executive Area is not shown on this plan. It gives the impression that this document has not understood ‘its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change’. Furthermore, there is a Duty on Broadland Council to seek to further contained in the LURA, section 245.
- As the various local character areas are discussed, a map is needed to show where these are – see South Norfolk Character Assessment, page 38 for example where a little map is included.
- Page 53 – again no mention of the Broads being a protected landscape and a status equivalent to a National Park.
- Page 53 – again, no images of the rivers of typical Broads landscape. Given it is a landscape assessment you should also show more wider landscape images containing views of the river.
- Page 54 – no mention of Halvergate Marshes being a Conservation Area.
- Page 57 – there is no mention of protecting the intrinsically dark skies of the Broads. Again, the context is not really addressed adequately.
- Page 57 – N4 is the design code that relates to the Marshes Fringe area which along its whole length borders the BA Executive Area. As such in the first para it should make clear that for all of the bullet points special consideration should be given to the Broads’ protected landscape status and development within its setting.
- Page 73 – Thorpe St Andrew - N4 / N11 Should make clear that special consideration should be given to the Broads’ protected landscape status and development within its setting.
- Page 76 – Brundall - N4 / N11 Should make clear that special consideration should be given to the Broads’ protected landscape status and development within its setting.
- Page 80 – Reedham – N4/N11 Should make clear that special consideration should be given to the Broads’ protected landscape status and development within its setting.
- Page 81 – Acle – no code has been provided for Acle. Is this an omission?

- Page 85 – Wroxham - N4/N11 Should make clear that special consideration should be given to the Broads' protected landscape status and development within its setting.
- Page 88 – Coltishall - N4/N11 Should make clear that special consideration should be given to the Broads' protected landscape status and development within its setting.

South Norfolk Character Assessment

- Page 26 and page 28 - no mention of the Broads being a protected landscape and a status equivalent to a National Park. The NPPF is clear in paragraph 189 about the setting of the Broads. Indeed, this document says at page 4 'Prior to appraising a development site and its immediate setting, it is essential to understand its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change'
- Page 28 – it is strange that there are no images of the Broads' landscape. Given it is a landscape assessment you should also show more wider landscape images containing views of the river.
- Page 31 - Page 27 – All the Broads that is within South Norfolk needs to be coloured in. The NPPF is clear in paragraph 189 about the setting of the Broads. Indeed, this document says at page 4 'Prior to appraising a development site and its immediate setting, it is essential to understand its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change' – given that the Broads is a protected landscape with a status equivalent to a National Park, it is not clear why the Broads Authority Executive Area is not shown on this plan. It gives the impression that this document has not understood 'understand its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change'. Furthermore, there is a Duty on Broadland Council to seek to further contained in the LURA, section 245.
- Page 40 – needs to refer to the Broads and state it is a Protected Landscape and development that would affect its setting needs special consideration.
- Page 47 – needs to refer to the Broads and state it is a Protected Landscape and development that would affect its setting needs special consideration.
- Page 56 – needs to refer to the Broads and state it is a Protected Landscape and development that would affect its setting needs special consideration.
- The pages that talk in detail about the Local Character Areas – the images just tend to focus on buildings whereas there are no images that relate to the key landscape characteristics – more images showing the wider landscape should be provided.

Compliance checklist

- There is no mention of the Broads. Questions relating to the impact of a scheme on the setting of the Broads is required in order to fulfil the Councils' duty contained in the LURA, section 245.