Planning Committee

6 November 2026
Agenda item number 10

Consultations submitted

Report by Planning Policy Officer

Summary

This report informs the planning committee of consultation submissions from 10 June 2026 to 4 September 2026. The report details consultations submitted under delegated powers and those consultations where the Committee has previously been invited to comment during the draft stage (either via email or at a previous committee meeting).

Recommendation

To note the report.

1. Introduction

1.1. Appendix 1 shows consultation responses on planning matters submitted under delegated powers. For further information on delegated powers, please refer to the Scheme of powers delegated to Chief Executive and other authorised officers and, in particular, clauses 66(iv), 66(v) and 67.

1.2. Appendix 2 shows consultation responses on planning matters where the committee has previously been invited to provide comments and guidance via email.

1.3. Appendix 3 shows consultation responses on planning matters where the committee has been invited to provide comments and guidance at a previous Planning Committee meeting.

Author: Natalie Beal

Date of report: 4 September 2026

Appendix 1 – Consultations submitted under delegated powers

Appendix 2 - Consultations submitted where members have previously been engaged via email

Appendix 1 – Consultations submitted under delegated powers

Brundall Parish Council

Document: Brundall's Neighbourhood Plan – Brundall Parish Council

Due date: 10 August 2026

Submission date: 15 July 2026

Status: Regulation 14

Proposed level: Officer level

Notes

The modified Brundall Neighbourhood Plan is a planning policy document prepared by the Parish Council on behalf of the community to guide future development in the parish until 2040. It has been updated since it was last written and adopted in 2016. The Steering Group wishes to know your views on the new Plan.

Submitted response

Neighbourhood Plan

- 1.16 – you refer to policies that start with 'PUB' – they are in the REG19 Local Plan that is being examined. You are referring in this to the adopted Local Plan and those policies do not have 'PUB'.
- 1.17 – you may want to refer to the Mayoral elections in 2028 and the Combined Mayoral Authority as well as Spatial Development Strategies (SDS). And the Broads Authority will remain as is.
- Page 15, para 2.1 and 2.2 the references to the Norfolk and Suffolk Broads should be replaced with the Broads.
- Page 19, para 2.26 the reference to the Norfolk and Suffolk Broads should be replaced with the Broads.
- Para 2.20 – take care using the 2021 Census for travel to work. I am aware that Norfolk County Council tend to not use it due to lockdown restrictions. Or also quote 2011 Census data.
- Policy BRU1 – how do the first and second paragraph interact with each other? The first says development in the settlement boundary, but then the second says that housing can go elsewhere. So are you promoting housing outside of the settlement boundary? The later on, parts a and b go on to talk about housing outside of settlement boundaries. That may be contrary to GN Local Plan and is contrary to our Local Plan. But then the last sentence talks about development outside of the settlement boundary only where is accords with local and national policy. A very confusing policy with mixed messages and potential for objections. I strongly recommend this is checked and clarified.

- Page 33, policy BRU1e – would suggest a slight reword to: ‘where the development would not have an adverse impact on important views or the historic or natural assets of the parish, including listed buildings and the Broads’.
- Page 36, Policy BRU2 in the second to last para on landscape, I would suggest that the ‘wherever possible’ should be removed. Developers can still argue why they can’t fulfil this requirement in their planning application if they don’t think they can for a valid reason.
- Page 20, listed buildings are mentioned but would it also be worth identifying locally listed buildings? The chalet at Brundall Gardens Marina is locally listed by the Broads Authority.
- Page 31, figure 11 – what is ‘parent shell’ on the key for the map?
- Figure 13 – A is on a railway line it seems whereas the policy (BRU3) implies it should be on Strumpshaw Road. Figure 14 shows this gateway in the right place.
- Figure 14 – the key is a bit small and blurry and difficult to read.
- Policy BRU5 – says ‘identifies’ and should be ‘identities’.
- Policy BRU6 – suggest this mentions that the need for lighting needs to be justified in the first place.
- 6.35 – second sentence – I don’t think it reads right. Maybe remove ‘which’.
- 6.43 – BNG is not mandatory for all sites; there are exemptions.
- *6.55 Correction:* The moorings in Brundall Gardens Marina are not Broads Authority 24 hour free moorings.
- The moorings at Eastwood Marina and Swancraft are privately managed but accessible to the public for periods of 24 hours as DM33 moorings as part of planning conditions. The mooring allocation for Brundall Gardens Marina is also DM33 - this section of mooring is a section adjacent to, but upstream of the Brundall Church Fen BA 24hr free mooring.
- The BA 24hr free mooring at Brundal Church Fen is 35m in length.
- Policy BRU8 says ‘a minimum increase of 10% net gain’ I think ‘increase’ is superfluous as it is a net gain.
- Policy BRU10 – Last para and bullet points – First bit is about Lackford Run and then second is about other locations. Should they be in the same paragraph or separated out?
- AMENDED Policy BRU11:p64. Please acknowledge the requirements for wheeled access - pushchairs/ buggies, wheelchairs, mobility scooters, walkers/ walking aids.
- Figure 30 key is blurry.
- Policy BRU14 paragraph 2 is different to our equivalent policy, Our policy says: ‘Applications for the change of use or redevelopment of an existing community, visitor or recreational facility or service that meets a local need or contributes to the network of facilities through the Broads will only be permitted where: a) It can be proven that there is

no community need for the service/facility; and b) It can be demonstrated through an assessment of viability that the current use is economically unviable. 2. In all instances, details of consultation with the community regarding the change of use or redevelopment need to be provided'. Your policy does not refer to no need and includes providing an equivalent facility.

- 7.26 'parish as a whole'
- Policy BRU6 says 'Proposals should provide or an contribute' – does not read right.
- 8.2 'main rivers These are also' – missing a full stop.
- 9.1 – and the Broads Authority
- BRU1, 10, 19 – all need to mention that they could result in more people accessing protected sites and therefore project level HRAs will probably be required. This is set out in the HRA screening and needs to be followed through into the Plan.

Statement to accompany pre-submission version – May 2026

The plan is much changed and should have a referendum.

Data Profile

- Update data document prior to REG16. Not all will need updating. But this should be up to date. The vast majority of the document won't change.
- The Broads Landscape Character Assessment is now a SPD and was adopted in May 2026: Broads Authority Design Guide and Code SPD (PDF)
- Figure 64 – EA updated flood risk data around March 26.

Design Guide

- Refers to items A – J but ends at G.
- Page 8, the latest version of the NPPF (at the moment) is 2024, not 2023
- Page 11, para 3.1 replace the Norfolk Broads with the Broads
- Page 13, para 4.4 reference to Salhouse parish – should be Brundall
- 4.4 – feasures – think you mean features
- 4.4 – refers to Salhouse Parish
- If this refers to Salhouse, it implies it is a cut and paste job – how is this design guide reflective of and relevant to Brundall?
- Page 14 j says 'New community provision: all community facilities must be within easy walking, cycling and wheeling distance of residential development and public transport, that are attractive and safe'. The last bit in green does not fit with the wording of the sentence. Should it be something like 'and routes need to be attractive and safe'. What

makes a route attractive? Do you mean pretty to look at or well designed so people want to use it? How does a route become safe?

- Page 15 k – what aspects of M4(2) are needed? I don't think the phrasing is useful – maybe it is that they should be designed to M4(2) standard? I note that such a requirement does not make it into the Neighbourhood Plan itself – if you want all new dwellings to be designed to M4(2) I would suggest it needs to be in a policy.
- What is so good about the images in Figure 5?
- Page 16 – anything about heat resilient design, particularly public realm?
- Page 17, f: 'into development layouts as part of a connected green corridors and water courses' – delete 'a'
- Page 19, b – 'around motor vehicle use'. What are access points?
- Page 19 h – how does this relate to building regulations?
- Page 19, Code, i) Bundall typo
- Page 24, title – Identity typo
- Page 24, Guidance d) palette not pallet – also should it be an appropriate colour palette (as shown in figure 26).
- Page 25, m) Riverside development, add natural materials
- Page 31 Areas 4 Marina Areas, second row (Identity) – please delete 'Broads Authority compliant' – not sure what this means? Some of the buildings will have been erected before the Broads Authority dealt with planning and may not be compliant in terms of our current expectations and planning policies etc.
- Figure 19 and 20 – are these good or bad?
- 5.2 'Where feasibly' – think that should be feasible
- 1.4. Include 'wheeling' into references to walking and cycling.
- D. p.19 - typo 'ease' to move around
- D.b.path widths to include space/ width for passing, supported walking (ie. One person alongside another). Where possible, segregated and safe cycle routes should be incorporated into design.
- D.d.add *with no barriers restricting access to wider mobility needs such as pushchairs and wheelchairs.*
- D. i.walking, *wheeling* and cycling routes
- D.k.to encourage walking *and wheeling*

North Norfolk District Council

Document: North Norfolk Local Plan Scoping Consultation

Due date: 31 August 2026

Submission date: 19 August 2026

Status: Scoping consultation

Proposed level: Officer level

Notes

North Norfolk District Council is preparing a new Local Plan. The Scoping Consultation is the first formal consultation stage in the local plan making process and is being carried out under Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2026. We are also running a second 'Call for Sites', which provides a further opportunity to suggest land that could be considered for a range of uses, including housing, employment, infrastructure, open space or community uses. Details of how to respond are available at the end of this notice.

Submitted response

At this stage, given this is early on in the process, I do not have any detailed comments on the context of the document. But please do see the following points.

Question 1, 2, 3: Generally welcome the reference to the Broads and/or nationally important/protected landscapes or similar wording. This shows that you appreciate the impact development can have on the Broads and its setting. Climate Adaptation to either be a standalone issue or, if they are basing it on being broken down into several areas as they seem to with reference to water resources, then it needs a separate category of withstanding heat.

Question 12: Going forward, early consultation with us on any sites that have come forward that are near to our boundary would be welcomed.

Question 10: Please ensure you keep us informed of any evidence base you intend to produce as generally, it should cover the entire district of North Norfolk, regardless of the area of the Broads.

General: As a reminder, we intend to continue having regard to/deferring to the open space, affordable housing and retail approaches of our districts' Local Plans.

Question 12 As you are aware, some settlements in North Norfolk are 'shared' between us and you for planning purposes. We would welcome continued collaborative working in relation to such settlements. For example, the restriction in development in Horning due to the water recycling centre capacity issues as well as working together in terms of Hoveton village centre.

There are some areas of the current Local Plan which we would like you to re-consider – we have raised these comments before as part of our consultation responses to that Local Plan and are raising them now, early on in the process. We are happy to meet to discuss there to hopefully come up with an acceptable way forward early on in the Local Plan process:

- The best thing, to meet the LUR Act 2023 provisions to further the purposes of the Broads, is to mention the Broads when the National Landscape is mentioned. In particular in relation to E7 and E8, special qualities of the Broads and also the impact of major development on the Broads.
- Identifying areas suitable potentially for onshore wind turbines that are right up next to our boundary.
- HC6 and the impact of telecommunications apparatus and infrastructure on the Broads.
- The changes to CC12 that removed 'native' from, the requirement for new trees: 'The planting of suitable native or appropriate new trees, hedgerows and woodland …… will be encouraged'

SWOT Analysis – The Climate Threats needs to be much more developed in the finished article. We are well beyond simply listing "extreme weather" – there needs to be actual consequences of that spelled out in terms of heat deaths, added houses flood, crop failure, accelerated coastal erosion. In particular, the risk of heat to elderly populations.

Given how much of the local area is within a National Landscape and the Broads, the LURA duty of regard should be front and centre of these priorities

Minor typos:

P22 4.23 'when compact' - should be compared

P24 - 4.30 - 'Broad's' - no apostrophe

Salhouse Parish Council

Document: Salhouse Neighbourhood Plan **www.tinyurl.com/SalhousePlan**

Due date: 07 September 2026

Submission date: 18 August 2026

Status: Regulation 14

Proposed level: Officer level

Notes

The policies within the 2017 Salhouse Neighbourhood Plan were approved prior to the adoption of both Local Plans and also to the current National Guidance. It is therefore in need of review to maintain relevance in the determination of planning applications. Salhouse Parish Council decided to embark on a review with work getting underway in Summer 2025.

Submitted response

Neighbourhood Plan

- Page 15, para 2.10 the Salhouse Conservation Area Appraisal (2004) should be referenced. BDC are due to review this document.
- Page 16, para 2.16 'The Broad' do you means 'The Broads' e.g The Broads Authority, or Salhouse Broad? Maybe make clearer.
- Page 16, para 2.17 – add reference to the BA's LCA SPD of the part in the Broads Executive Area. This is defined as 'Carr Woodland'
- 22.25 - says 'Employment levels remain high, though rising living costs have increased pressure on some households'. I am not sure that 'though' is the intended linking word. I think 'and' is better.
- Policy SAL1, page 33, left hand column, Roman Numerals – I think these need mapping.
- Page 29, para 5.2 would it be worth explaining that some of the woodland in the BA area is carr woodland and the benefits that has in terms of biodiversity etc.
- 5.10 – starts with 'It' – what is 'it' in this instance?
- Policy SAL2 – left hand column, third para – need to refer to the Broads Landscape Character Assessment SPD.
- Policy SAL2, left hand column, fourth para – the two parts of this para contradict each other to me. The first talks about development along a road which may result in ribbon development and the second seeks to prevent ribbon development.

- Policy SAL3, para 1 – suggest this is split into two. The first part is an overarching stance. The second part then goes into street lighting.
- Policy SAL3, b – random) x2
- Figure 7 could usefully show the BA area.
- 5.22 – add 'the Broads' as the Broads is not a National Park.
- Policy SAL5 first para – you don't mention climate change resilience. You may want to do that.
- Policy SAL5 first para – climate change adaptation and mitigation is more than just low or zero carbon homes and buildings and high energy efficiency levels. I suggest checking this paragraph.
- Policy SAL5 – given the heat waves recently, you might want to refer to heat resilience in design.
- Policy SAL5, community energy schemes – do you want to caveat that you support these in principle, subject to meeting development plan policies? Otherwise, it could be seen as support even though a scheme may be contrary to other policies.
- Policy SAL5, community energy scheme – part 2 confuses me – community energy schemes are supported as long as they don't prejudice other community energy schemes. I don't understand how to use that bit of the policy.
- Policy SAL5, Surface water and pollution – please mention something about addressing quality of water before it enters the Broads. Our Members are keen that schemes address the quality of run off into the Broads.
- Para 6.2 – 'these tend to be located at more major centres on the Broads such as Horning,'
- Para 6.5 – one part says tourism development is not supported but another says tourist accommodation is.
- Policy SAL6, promotion of new employment – do you want to specify where new employment can go? As worded, this seems to support it anywhere…
- 7.5 – specify Greater Norwich Local Plan
- 7.8 - new development I in the parish
- Policy SAL7, first para – says Figure X – I think this is 6.
- Policy SAL7 – para 1 – say which Local Plan.
- Policy SAL7 – third para, second part of sentence – Is this major as in the current definition or major as in the proposed definition? I wonder if you want to check this part of the policy as what if a scheme for ten dwellings comes in that is in the settlement boundary or accords with local or national policy and is not within the North Rackheath allocation?

- Para 7.13 – when are the instances where social integration is not a priority?
- Para 7.20 – I don't understand what is being said here – are you saying that even if a developer proves that viability is an issue and this affects affordable housing provision, the Parish Council will not accept that? What are 'such measures'?
- 7.21 talks about self build and then adaptable homes as though they are the same thing. Para 7.22 then talks about accessible homes but also implies these are adaptable. This is confusing.
- Policy SAL9 – accessible and adaptable homes – which Local Plan policy is this referring to? Do you need to repeat that if it is already adopted policy?
- Policy SAL9 – objection – object to the last paragraph that talks about specialist housing being outside the settlement boundary. This is contrary to Local Plan policy DM41 that requires these to be within the development boundary. Staff and visitors need to access this housing and if outside of a development boundary, it is likely that the only choice will be single occupancy car use. Furthermore, residents need to access facilities and services and may want to do this independently and so by being outside of a settlement boundary, this will be hard to do.
- 7.29 – the last sentence says that fewer respondents prioritised a few things with the first things have a low % in brackets. But the remaining things have a high % in brackets. This is confusing as a higher % would mean greater support.
- SAL10, first para, second sentence – 'Proposals need to accord with the Salhouse Design Guidance and Codes 2026 and will be supported where they demonstrate that they have been designed in accordance with the following principles'
- SAL10, 2, f – you already have policy on dark skies. Why do you need SAL10 to talk about lighting? Also, SAL10 wording and stance is different to the dark skies policy which says 'the proposed lighting is necessary and proportionate to its intended function, with a clear justification provided'.
- Para 8.6 – 'New development should help to create safe, well-designed paths and crossings for everyone - including people with limited mobility - and does not harm the enjoyment or character of our public rights of way. was to develop an integrated village path network which links the core part of the village with the rural hinterland and the natural and built heritage features'. I think there are some words missing.
- 8.7 – 'Wherever practicable, the creation of new access arrangements should complement the existing routes in the neighbourhood area as shown in figure X'. Think this should be Figure 23.
- SAL12 – top two bullets on page 69 – should be 'ensure'.
- SAL12 - the HRA screening says 'Any proposals related to new connections may require a project level HRA to assess any potential impact' – this needs to be included in the policy. Potential objection otherwise.

- 8.14 - Improvements to the station building itself for or its ancillary amenities such as the waiting room will be supported.
- Page 61, figure 21: The northern boundary of the CA appears to be blue rather than black. Please could this be amended so that it is clear that this is the boundary?
- Page 61, para 7.38: this states: 'There is also a smaller conservation area centred on Park Farm and Vicarage Farm outside of the main built up area'. This is not a separate conservation area but a detached part of the main Salhouse Conservation Area.
- Page 62, para 7.41: could add at the end of the sentence that the conservation area is a designated heritage asset. That would then make sure people are aware that the end of PolicySAL11 (re requiring a heritage statement) would apply to any applications within the conservation area.
- Page 70, policy SAL14 Salhouse Station: this implies that the station building should be retained and improvements would be supported but should it make clear that demolition of the building would not be supported (assuming that is the case given its heritage value as set out in para 8.10).
- SAL15 – this is contrary to Local Plan for the Broads policy DM44. Parts A and B are not included in that policy. SAL15 does not include anything about no community need. DM44 says: Applications for the change of use or redevelopment of an existing community, visitor or recreational facility or service that meets a local need or contributes to the network of facilities through the Broads will only be permitted where: a) It can be proven that there is no community need for the service/facility; or b) It can be demonstrated through a viability assessment that the current use is economically unviable.
- SAL15 part b – says 'Other adequate facilities offering the same service exist within a reasonable walking distance of the majority of residents, to meet local needs and this would avoid a duplication of facilities' – the green bit does not fit or make sense. What is 'this' in this instance? This part is about loss of a facility so if a facility is lost, it cannot be duplicated.
- SAL15, new community facilities – 'make, expand'

Statement to accompany pre-submission version – June 2026

There are many changes to the Plan and it should go to referendum.

Data profile

1.6.1 – the emerging Local Plan for the Broads is at examination.

1.6.2 – the Design Guide is an SPD: Broads Authority Design Guide and Code SPD (PDF). This was adopted March 2025.

Design guide

Page 8 – NPPF is 2024 not 2023 (at time of writing!)

Page 20, C g – this only talks about street lighting. It needs to include other lighting. And needs to say that lighting needs to be justified in the first place.

Page 22, D a – what do you class as walking distance? This might been to say something about the route the pedestrian takes – a surfaced route perhaps.

Page 23, D i – there are building regulations relating to EV charging points. How does this wording relate to them?

Page 28: Code k: Should be the 'Salhouse Conservation Area Appraisal' document

Page 29: first bullet point re: variegated brick. There are examples in Salhouse (Barn Piece Close!) where the bricks are too varied and contrast greatly giving a 'salt and pepper' effect. Perhaps the wording here could be changed to suggest that brickwork should match the Norfolk red bricks predominantly found in the area, which are mainly a blend of different shades of orange and red. There doesn't tend to be too much yellow and brown traditionally

Page 34 – did you want to add the requirements of para 5.1 into policy?

MHCLG

Document: Permitted development rights: schools, assets of community value, defence and conservation https://www.gov.uk/government/consultations/permitted-development-rights-schools-assets-of-community-value-defence-and-conservation/permitted-development-rights-schools-assets-of-community-value-defence-and-conservation

Due date: 05 August 2026

Submission date: Date unknown – response sent in using online form.

Status: Government consultation

Proposed level: Officer level

Notes

This consultation seeks views on proposals relating to permitted development rights.

We are consulting on extending the existing temporary permitted development right that provides for temporary buildings on school land where buildings have ben affected by reinforced autoclaved aerated concrete (RAAC) for an additional 2 years.

We are also consulting on removing assets of community value from the permitted development right that allows for the demolition of certain buildings, so they would no longer be able to be demolished without first applying for planning permission.

We are also consulting on several changes to the permitted development right that allows for development by the Crown on closed defence sites, to support the delivery of a Defence estate that is fit for purpose, aligned to whole force needs, and that maximises the use of estate assets.

Finally, we are consulting on new permitted development flexibilities to support the development of conservation measures within Environmental Delivery Plans by Natural England as part of the Nature Restoration Fund.

Submitted response

Question 1

Do you agree that the existing temporary Class CB of Part 4 permitted development right should be extended by two years to 24 October 2028?

Yes

Question 2

Do you think that the proposed extension of the temporary permitted development right schools affected by RAAC could impact on: a) businesses b) local planning authorities c) communities?

Yes
a) Businesses -not particularly, except maybe more work for local contractors.
b) LPA's – not particularly maybe less work, but maybe more queries.
c) Communities – may produces worry about the reason for the works or confidence that the problem is being dealt with.

Question 3
Do you think that the proposed extension of the temporary permitted development right for schools affected by RAAC could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

No

Question 4
Do you agree that Class B of Part 11 should be amended to exclude assets of community value and, in future, sporting assets of community value?

Yes

Question 5
Do you think that the proposed change in relation to the Class B of Part 11 permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Yes
a) businesses – when a business fails and an alternative is proposed, an ACV could prevent this, making the building potentially unusable.
b) LPAs: the change would provide greater control to ensure that ACV which contribute to the local community (either by virtue of their use or community value and history) are only demolished when the LPA thinks it is appropriate;
c) communities: the proposed change would enable communities to have a say on the potential demolition of ACV through the planning process, thereby potentially reducing the number of ACV that are lost. ACVs are received with mixed emotions, those passionate about facilities are happy that they can potentially protect them, conversely those looking to re-developed failed sites dislike the fact that a premise that is unused due to viability can be held in uncertain limbo by red tape.

Question 6
Do you think that the proposed removal of assets of community value and, in future, sporting assets of community value from the Class B of Part 11 permitted development right could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

Yes – potentially a group of the listed persons may find an unused site that is protected by AVC and maybe not realistically be able to use it.

Question 7
Do you agree that the permitted development right is amended to allow an increase in the total floor space of any buildings for use as single living accommodation via erection or extension beyond 25% of the total floor space?

Yes

Question 8
If yes, should this be an increase to:

- 35%
- 50%
- Other. Please specify.

Please provide your reasons.

35% the approach should be cautionary, and the limit could be sought to be increased if necessary.

Question 9
Do you agree that the permitted development right is amended to allow an increase in the total floor space of any non-residential building via erection or extension beyond 35% of the total floor space?

Yes

Question 10
If yes, should this be an increase to:

- 45%
- 50%
- Other. Please specify.

Please provide your reasons.

45% the gap between 45 & 50% could be significant considering the large size of some building on a defence site.

Question 11
Do you agree that the prior approval should no longer be triggered by a cumulative footprint of 4,000 square metres and instead by the scale of individual proposals?

Yes - a finite size can be limiting when large buildings are developed.

Question 12
If yes, do you agree that the permitted development right is amended to instead require an application to the local planning authority for determination as to whether the prior approval

of the authority is required as to siting and scale where an individual development is above a threshold of:

- 2,000 square metres
- 2,500 square metres
- 3,000 square metres
- Other. Please specify.

Please provide your reasons.

2500m² - middle ground

Question 13
Do you agree that Class TA of Part 19 is amended to allow extensions or alterations within 15 metres of the perimeter of the closed defence site?

Yes – only if the existing building is closer than 15m, not if the extension is closer than 15m

Question 14
Do you agree that where the development is more than 25 metres from the perimeter of the closed defence site, Class TA of Part 19 is amended to allow:
i) the erection of new buildings from 12 metres to up to 18 metres in height?
ii) extensions or alterations of up to 18 metres or up to the height of the existing building, whichever is lesser?

i) Yes
ii) yes

The PD right needs to consider the potential for MOD sites to be near to protected landscapes. As such there needs to be consideration of the impact of any extension on the protected landscape.

Question 15
Do you agree that the definitions of 'closed defence sites' and 'non-residential buildings' should be amended so as to refer to sites and buildings (respectively) used wholly or mainly for purposes connected with defence'?

Yes – from experience, I know that other uses form a valuable part of the functioning of a defence site.

Question 16
Do you think that the proposed change in relation to the Class TA of Part 19 permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Yes
a) this could allow business to be located on a defence site, using otherwise unused premises.
b) LPA's should receive fewer applications

c) Local communities could be surprised that defence sites are allowed to extend building close to the boundary to such an extent.

Question 17
Do you think that the proposed changes to the permitted development right for Crown Development on a closed defence site could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

No

Question 18
It is proposed that Natural England and operators on its behalf benefit from a national grant of planning permission for the implementation and maintenance of conservation measures within an EDP amounting to development. Do you agree?

Yes – important projects should not be held up and other protections apply to ensure work is not harmful.
Para58: I would question if NE will be resourced for the assessment the PD via prior approval. The difficulty is that we don't know the magnitude of the work and how any burdens money might be allocated.
Para59 is suitably protective for the conservation enhancement measures.

Question 19
It is proposed that any national grant of planning permission would not apply on the site of a scheduled monument. Do you agree?

Yes

Question 20
It is proposed that if any part of the development is in a conservation area, prior approval on the impact of the siting and appearance of the development on the character and appearance of the conservation area would be required. Do you agree?

- yes
- no, development in a conservation area should be permitted without the need for prior approval
- no, development should not be permitted in a conservation area
- don't know

Please provide your reasons.

Yes

Question 21
It is proposed that if any part of the development is in a World Heritage Site, prior approval on the impact of the siting and appearance of the development on the Outstanding Universal Value of the World Heritage Site would be required. Do you agree?

- yes

- no, development in a World Heritage Site should be permitted without the need for prior approval
- no, development should not be permitted in a World Heritage Site
- don't know

Please provide your reasons.

Yes

Question 22

It is proposed that if any part of the development is on the site of a registered park, garden or battlefield, prior approval on the impact of the siting and appearance of the development on the special historic interest of the asset would be required. Do you agree?

- yes
- no, development on the site of a registered park, garden or battlefield should be permitted without the need for prior approval
- no, development should not be permitted on the site of a registered park, garden or battlefield
- don't know

Please provide your reasons.

Yes

Question 23

It is proposed that if any part of the development is on the site of a protected wreck, prior approval on the impact of the siting and appearance of the development on the historical, archaeological or artistic importance of the protected wreck would be required. Do you agree?

- yes
- no, development on the site of a protected wreck should be permitted without the need for prior approval
- no, development should not be permitted on the site of a protected wreck
- don't know

Please provide your reasons.

Yes

Question 24

It is proposed that if any part of the development is on the site of a listed building or land within its curtilage, prior approval on the impact of the siting and appearance of the development on the building, its setting or any feature of special or historic interest which it possesses would be required. Do you agree?

- yes
- no, development on the site of a listed building or land within its curtilage should be permitted without the need for prior approval
- no, development should not be permitted on the site of a listed building or land within its curtilage
- don't know

Please provide your reasons.

Yes

Question 25
Where development is subject to prior approval on the basis of land designation, this would apply in respect of most of the permitted development proposed in this consultation chapter (with the exception of temporary development for surveys and investigation, as set out in paragraphs 90 to 92). Do you agree?

Yes

Question 26
It is proposed that development be permitted in protected landscapes with no prior approval process. Do you agree?

- yes
- no, development in protected landscapes should be permitted subject to prior approval
- no, development should not be permitted in protected landscapes
- don't know

Please provide your reasons.

No - see above - it depends on resources. Requires detailed knowledge of National Park Local plans and Policies and long-term expertise of the NPA should be considered as an asset and not a constraint. We would welcome discussion on how this might locally work through consultation of the EDP process and most importantly as conservation measures come forward.

It is essential that anything Natural England want to do in a protected landscape is discussed with the managers of that land. It will not hold things up but will make sure you do not end up with perverse outcomes from the actions of Natural England and the national park or other relevant authority. You could imagine creation of wetlands in one area may have deleterious effects on something the national parks plans to do on adjacent land.

Question 27
Beyond the mechanisms already outlined in paragraph 59, should we seek to control the development of conservation measures on land where it may restrict future development and land uses?

No – this needs careful consideration of the importance of the conservation proposals weighed against future other developments.
No – there should be no further controls on development of conservation measures on land, as this would impose restrictions without any clear mechanism or clear benefit. The consultation of the EDP stage is adequate for this purpose.

Question 28

It is proposed that landscaping, including excavations and deposits, be permitted. Do you agree?

No
It must be assessed on the scale and type of deposits; a blanket permission is not acceptable. In some areas where peat soils are present these need to be protected and enhanced and not excavated. There is no mention the safeguards that will be put in place. The EDP for the Broads SAC for example may propose conservation measures that could result in excavation of peat soils. This may not be an issue if the excavations are small scale and result in certain peat rewetting. We recommend that the Broads Peaty Policy, or other suitable peat restoration policy document is conditioned and compiled with to ensure no unintended consequences for UKs Net Zero ambitions and Natural England's Lowland Peat Road Map.

Furthermore, scrapes and bunds can have impact on landscape. For example:
BA/2018/0463/FUL | Retain scrape | Land East Of Brograve Mill Coast Road Waxham Norfolk. This scheme was refused and this decision was upheld at appeal.
The delegated decision report concluded: 'The scrape and drainage ditch represent an incongruous and harmful intervention in the landscape which has an unacceptable impact on the landscape character of this area of the broads and on landscape appearance. The existence of the scrape is not justified, no evidence has been provided to demonstrate that it is required to contribute to land and water level management, make better or more efficient use of the land, or contribute to viability of the overall farm of which it forms a part. The presence of the scrape is to the detriment of wild birds in potentially drawing them away, from nearby designated sites and the network of habitats'.
The appeal decision report concluded: 'Nevertheless, despite the reduced visual accessibility, such an unnatural, engineered feature causes a significant degree of harm to the intrinsic character of the Broads landscape'.
Fundamentally, the landscape of the Broads is fairly open and features in the landscape can be seen for a long distance.

Question 29
It is proposed that removing minerals from the site and bringing waste materials on to the site should be conditioned as set out in paragraph 62. Do you agree?

No. the exclusion of deposits for paths etc, is unacceptable. Further controls on type and source of waste material must be included. Maybe prior consultation with LPAs as per EA.

Question 30
It is proposed that prior consultation with the Environment Agency on flood risks as set out in paragraphs 63 and 64 would be required. Do you agree?

Yes

Question 31
It is proposed that landscaping, including excavations and deposits, are not subject to any conditions or limitations on their overall size or scale. Do you agree?

No. this will lead to damage to the environment, landscape and peat. A proper assessment is essential. Maybe prior consultation with LPAs as per EA.

Question 32
It is proposed that a contamination screening assessment and, depending on the outcomes of the assessment, prior approval on contamination risk as set out in paragraphs 66 and 67 would be required. Do you agree?

Yes

Question 33
Are there any other conditions or limitations that should apply to landscaping, including excavations and deposits?

Yes – size , scale, type of deposits, source of deposits, suitability for the specific environmental needs of the area needs to be assessed. Excavations need to be assessed against local requirements or policies – such as peat in the Broads. Landscape impact needs consideration.

Question 34
It is proposed that the development of fences etc. as set out in paragraph 70 should be permitted. Do you agree?

Yes

Question 35
Are there any other conditions or limitations that should apply to the development of fences etc.?

No

Question 36
It is proposed that the development of footpaths, cycleways and bridleways as set out in paragraphs 72 and 73 be permitted. Do you agree?

No.
Introducing hard standing/surfacing in an area of protected landscape is a concern.
Also balance HRA implications of increasing access to protected sites.
Often have signage and interpretation with them – what about that?
What about lighting and light pollution and dark skies?

Question 37
Are there any other conditions or limitations that should apply to the development of footpaths, cycleways or bridleways?

Yes
Material
Scale

Signage and interpretation
Lighting
Further controls on type and source of waste material must be included.

Question 38
It is proposed that the development of structures should be permitted. Do you agree?

Potentially. Images of what is intended should have formed part of the consultation to understand what you are proposing.

Question 39
It is proposed that the development of a pole, post or mast and any associated structure (for the purposes of wildlife monitoring and habitat creation) to be mounted above ground level on it (or on a tree, existing structure or building) be limited in terms of size and height as set out in paragraphs 75 and 76. Do you agree?

Potentially. Images of what is intended should have formed part of the consultation to understand what you are proposing.
What about the impacts of the power source that may be needed?

Question 40
It is proposed that the development of structures at ground level for the purpose of providing a wildlife habitat (or a purpose ancillary to a wildlife habitat, such as access or monitoring) be limited in terms of size as set out in paragraph 77. Do you agree?

Potentially. Images of what is intended should have formed part of the consultation to understand what you are proposing.
What about the impacts of the power source that may be needed?

Question 41
It is proposed that the development of structures below ground level for the purposes of providing wildlife habitats and monitoring be limited in terms of size as set out in paragraph 78. Do you agree?

Para 78 – there could be peat removed. How will that be addressed through these proposed PD Rights?

Question 42
It is proposed that any structure developed at or below ground level for the purposes of blocking ditches, diverting watercourse or flooding land be limited to a maximum of 1 metre in height above the prevailing land level. Do you agree?

Potentially. How will the impacts on flood risk to an area be considered?

Question 43
It is proposed that the maintenance, improvement or other alteration of an existing structure should be conditioned as set out in paragraph 81. Do you agree?

Potentially. Images of what is intended should have formed part of the consultation to understand what you are proposing.

Question 44
Are there any other conditions or limitations that should apply to the development of such structures?

Impact on landscape
Impact of any power source
Peat removal

Question 45
It is proposed that the replacement, improvement or alteration of an existing above ground slurry store; and the erection, construction, improvement or alteration of above ground slurry store covers be permitted. Do you agree?

Yes

Question 46
It is proposed that the height, size and siting of above ground slurry stores and covers be limited to the parameters as set out in paragraph 84 and 85. Do you agree?

No 8 metres seem excessively high; a limit of 5 metres would make it less intrusive to the natural landscape and environment.

Question 47
Are there any other conditions or limitations that should apply to the development of above ground slurry stores or covers?

Impact on landscape
Impact of any power source
Peat removal

Question 48
It is proposed that the development of a single vehicular access, of up to 10 car parking spaces, structures for cycle parking, height barriers and pay and display machines in connection with an EDP SANG be permitted. Do you agree?

No
300 square meters is a large area of development in a protected landscape that is open in nature.
So this kind of scheme needs permission to consider the full impact on protected landscapes.
Exclude article 2(3) land from this PD right.
EV charging points and to some extent pay and display can introduce lighting to an area of dark skies – light pollution
Works to provide electricity as well

HRA implications
Impact on landscape
Peat removal.

Question 49
It is proposed that the development of any hard surfacing be conditioned as set out in paragraph 87. Do you agree?

Para 87 – by removing the need for it to be porous, what about the ensuing surface water run off and flood risk? That will need treating. You are saying that to protect water quality, the surface may be non-porous but then that means there will be run off into the area that is trying to be protected due to water quality – it is not logical.

Question 50
It is proposed that Natural England be required to seek prior approval on transport, highways and access impacts prior to commencing the development of a vehicular access or car park as set out in paragraph 88. Do you agree?

300 square meters is a large area of development in a protected landscape that is open in nature.
So this kind of scheme needs permission to consider the full impact on protected landscapes.
Exclude article 2(3) land from this PD right.
EV charging points and to some extent pay and display can introduce lighting to an area of dark skies – light pollution
Works to provide electricity as well
HRA implications
Impact on landscape
Peat removal

Question 51
It is proposed that the existing electric vehicle recharging permitted development rights (Class D and Class E of Part 2 of the General Permitted Development Order) be amended as set out in paragraph 89. Do you agree?
EV charging points and to some extent pay and display can introduce lighting to an area of dark skies – light pollution and impact on dark skies. Also, there will be the need to supply electricity; there could be impacts from the works to provide electricity in isolated areas.

Question 52
Are there any other conditions or limitations that should apply to the development of a single vehicular access, of up to 10 car parking spaces, structures for cycle parking, height barriers, and pay and display machines?
This PD right cannot apply to article 2(3) land. These developments can negatively impact a protected landscape. There are numerous and various issues:

- *Heights of structures must be limited so as not to have a detrimental effect on the landscape.*
- *Light pollution relating to lighting for car parking as well as the pay and display machines.*

- *Impaction of peat.*
- *Appropriate landscaping.*

Question 53
It is proposed the development of temporary buildings, plant, machinery and apparatus in, over, or under land, for the purposes of survey or investigation set out in paragraphs 91 and 92 should be permitted. Do you agree?
Such sites may be isolated and in areas of dark skies; light pollution and introduction of light, even temporarily, is an important consideration. There is also the negative impacts from impaction of peat that needs to be considered.

Question 54
Are there any other conditions or limitations that should apply to the development of temporary buildings, plant, machinery and apparatus for the purposes of survey or investigation?
Yes. Such sites may be isolated and in areas of dark skies; light pollution and introduction of light, even temporarily, is an important consideration. There is also the negative impacts from impaction of peat that needs to be considered.

Question 55
It is proposed that any land and buildings on that land, be permitted to be used for the purposes of conservation in accordance with proposals in an EDP, as set out in paragraphs 93 – 95. Do you agree?

The proposal is poorly worded. It is not clear what is meant.
Are you proposing demolishing barns for example to make way for habitat? Or that the barn could be improved to attract bats and owls for example or have other biodiversity enhancement features added?

Question 56
Are there any other conditions or limitations that should apply to the use of land, and buildings upon that land, for the purposes of conservation measures in accordance with proposals in an EDP?

Lighting and light pollution
Landscape impact
Peat removal.

Question 57
Should any other development be permitted to be undertaken by Natural England for the purposes of implementing conservation measures in accordance with proposals in an EDP and maintenance of the site?

No

Question 58

Are there any other conditions or limitations (including prior approvals or land exclusions) that should apply to development permitted for the purposes of implementing conservation measures in accordance with proposals in an EDP and maintenance of the site?

Lighting and light pollution
Landscape impact
Peat removal.

Question 59
Do you think that permitted development flexibilities proposed to support the development of conservation measures within an EDP could impact on: a) businesses b) local planning authorities c) communities?
Yes
a) don't know
b) additional resources may be needed
c) could be beneficial to visitors and promote awareness of environmental issue, but could be considered as overuse of protected landscapes.

Question 60
Do you think that permitted development flexibilities proposed to support the development of conservation measures within an EDP could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).
No

Question 61
Do you think that permitted development flexibilities proposed to support the development of conservation measures within an EDP could give rise to environmental impacts that should be considered against the five environmental principles? (integration, prevention, rectify at source, polluter pays, and precautionary).
Yes. There is potential for landscape impact, light pollution, impacts on peat, compaction as well as HRA concerns

Appendix 2 – Consultations submitted where members have previously been engaged via email

East Suffolk Council

Document: East Suffolk Local Plan Scoping Consultation
https://storymaps.arcgis.com/stories/42fcff95aef94dfc9ec194352ddf1771

Date of email to members: 29 June 2026

Due date: 29 July 2026

Submission date: 13 July 2026

Status: Scoping Report

Proposed level: Planning Committee Members received the draft response by email.

Notes

This was the first stage of new style Local Plan making. It sought answers to these general questions:



Submitted response

Questionnaire

Assuming the Data and Background document is what we should be looking at, my main comment is that the fact that the BA is the LPA for part of the area is not explicitly mentioned

anywhere and it should be, otherwise people will think their Local Plan will apply to the BA Executive Area. Even in the sections on Heritage and Landscape, where other protected landscapes are set out, no mention is made of the Broads. Bizarrely it is only on the maps in the section relating to 'Settlements' (towards the end of document, page 34 onwards) that the BA area is shown on the maps. This needs to be amended.

Question 2:

Data and background document: East Suffolk Local Plan - Data and Background

Broads not mentioned under landscape. Not shown on the mapping.

You need to ensure you meet the Districts' duty under the Section 245 of the Levelling up and Regeneration Act to seek to further the statutory purposes of protected landscapes.

Question 6:

The Broads Authority Executive Area covers part of East Suffolk. This is a protected landscape and as such the landscape impact of any potential development on the setting of the BA area will need to be considered. The Broads Authority LCA SPD has recently been approved and should be referred to. Section 245 of the LURA also put an obligation on public bodies to seek to further the purposes of the National Park. These are:

- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
- Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public;
- Protecting navigation.

Question 12:

In terms of scoping, on Climate I would say;

- Should have express reference to the Well Adapted UK Report, and the Broadland Futures Initiative
- It needs to be more explicit that climate is a cross cutting theme and not a standalone thing – they come close to it with highlighting poor public transport for instance, but don't make the link to how that will impact where Tourism and Housing can be placed to minimise transport emissions.

Question 13

Data and background document: East Suffolk Local Plan - Data and Background

Broads not mentioned under landscape. Not shown on the mapping.

SEA Scoping

Section 3 – relevant plans and documents. You need to include:

- Broads Plan
- Local Plan for the Broads
- Broads Landscape Character Assessment
- Broads Landscape Sensitivity Study
- Broadland Future's Initiative
- LURA – for example the new duty to have further purposes of the Broads and National Landscapes
- Shared standards in water efficiency for local plans: anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf

No page numbers

Section 4, soils, 4.83 onwards – there is no mention of peat. The peat map for England England Peat Map (EPM) Portal shows peat in East Suffolk. Also, the NPPF that was recently consulted on, CC2, 1, f seeks to protect peatlands.

Section 4, water, 4.100 onwards – there is no reference to the shared standards for water efficiency for Local Plans.

Section 4, water, 4.106 onwards – there is no mention of surface water run off going into the Broads and affecting water quality.

Section 4, landscape, 4.172 onwards – title says 'nationally landscapes' – is that national landscapes or nationally important landscapes? In nationally important landscapes, then discuss the Broads. If national landscapes, then have a new title for the Broads. It is strange that the Broads, which is equivalent to a National Park, does not have a mention. You also don't mention the duty to further the purposes of the Broads and National Landscapes in this section. And the Broads is not mentioned under the likely evolution section.

There is no mention of light pollution.

Section 5 table

- Soils – need to mention peat
- Landscape – need to mention the Broads
- There is no mention of light pollution

Section 6 table 5

- Part 6 – refer to light pollution
- Part 7 – refer to peat

- Part 11 – refer to the Broads

Section 6, table 6

- Part 9 – refer to light pollution
- Part 10 – refer to peat
- Part 15, column 3 – refer to the Broads

You focus climate change mainly relating to coastal erosion, when there will be issues in the Waveney of salt intrusion threats as in the rest of Broads.

I am not sure if the proposed major drinking water reservoir and transfer scheme is relevant but I don't think I saw mention of it in the SEA or in terms of drinking water supply.

Sites

East Suffolk Local Plan Call for sites - All sites submitted

Site 18, 20, 184, 110, 454, 328, 366 ,123 and 273 are all next to or near to our area. I understand that you have not assessed these yet.

There is not much information about what is proposed on the above webpage.

You will need to consider the impact on the setting of the Broads in landscape terms. You will need to consider light pollution impact. You will need to consider the issue of run off into the Broads and water quality.

Those are some initial considerations.

In assessing the sites, you need to ensure you meet the Districts' duty under the Section 245 of the Levelling up and Regeneration Act to seek to further the statutory purposes of protected landscapes.

Some early, initial comments on sites:

Site 17, Somerleyton: Site 18, Somerleyton: This site sits immediately adjacent to the Broads Authority Executive Area and the Somerleyton Conservation Area and in close proximity to the Duke's Head PH and Brickfields Cottages, both of which would be considered locally identified heritage assets. Any development would need to consider the setting of both the Executive Area and the heritage assets. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 18, Somerleyton: This site sits immediately adjacent to the Broads Authority Executive Area and the Somerleyton Conservation Area. Any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 19, Somerleyton: This site sits in close proximity to the Broads Authority Executive Area and the Somerleyton Conservation Area. It is positioned on slightly higher ground overlooking the Broads and any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to seek to consider potential impacts on the Protected Landscape and further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 20, Somerleyton: This site is in close proximity to the Broads Authority Executive Area and the Somerleyton Conservation Area. It is positioned on slightly higher ground overlooking the Broads and any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 30, Somerleyton: This site sits immediately adjacent to the Broads Authority Executive Area and the Somerleyton Conservation Area. Any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 184, Flixton: This site sits immediately adjacent to the Broads Authority Executive Area and to the south of The Nebb, a grade II listed building. Any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 110, Flixton: This site sits immediately adjacent to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 454, Flixton: This site sits immediately adjacent to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 366, 328 and 217, Oulton Broad: This site is in close proximity to the Broads Authority Executive Area and the grade I listed Church of St Michael. It is positioned on slightly higher ground overlooking the Broads and any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 123, Carlton Colville: This site sits immediately adjacent to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 273 and 314, North Cove: This site is in close proximity to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 236, Bungay: This site sits immediately adjacent to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to seek to consider potential impacts on the Protected Landscape and further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.