

Planning Committee

07 March 2025

Agenda item number 10

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: 11 February 2025

Appendix 1 – [East Suffolk Neighbourhood Planning Guidance – Climate Change](#)

Appendix 2 – [East Suffolk Neighbourhood Planning Guidance – Housing](#)

Appendix 3 – [Strumpshaw Neighbourhood Plan review – Regulation 14](#)

Appendix 4 – [Broadland and South Norfolk draft joint Custom and Self-Build Housing Supplementary Planning Document \(SPD\)](#).

Appendix 1 – East Suffolk Council Neighbourhood Planning Guide – Climate Change

East Suffolk Council

Document: [Neighbourhood Plan Guidance for Climate Change - East Suffolk Council, Strategic Planning Consultations](#)

Due date: 12 March 2025

Status: Draft

Proposed level: Planning Committee endorsed

Notes

Climate change, and the need to mitigate the impacts, is an issue that local communities can help to address. Neighbourhood Plans can be a key tool for ensuring new infrastructure and development responds more effectively to potential climate change impacts by incorporating appropriate adaptation and mitigation measures.

Proposed response

Should the title be **Neighbourhood Plan Guidance for the Environment and Climate Emergency?**

Page 9 – “Include onsite renewable energy generation” – this should also refer to batteries, which are becoming increasingly affordable and make a big difference for households in terms of bills and making best use of their renewable energy, as well as balancing the overall energy grid.

Page 15 – Guidance For Parking – this sits a little bit strangely within “Sustainable Design” as there isn’t an equivalent section for cycle parking or for public transport access. As a minimum a sustainable design needs to include somewhere to park a bicycle.

Page 16 – Similarly the only sustainable transport element is EV charging – this reads strangely as something within the general sustainable design heading when transport generally sits in a different section.

Appendix 2 – East Suffolk Council Neighbourhood Planning Guide – Housing

East Suffolk Council

Document: [Neighbourhood Plan Guidance for Housing - East Suffolk Council, Strategic Planning Consultations](#)

Due date: 12 March 2025

Status: Draft

Proposed level: Planning Committee endorsed

Notes

Housing is a basic need for everyone and a vital issue for communities. It is widely acknowledged that we are in a housing crisis and finding a suitable home in the right place can frequently be a challenge for people. This guidance document will help explain the role that Neighbourhood Plans can play in addressing some of the issues which local communities may face in accessing the homes they need.

Proposed response

Page 3 – useful introduction, but is it worth saying a little something about how it needs to be the right home in the right place rather than any home anywhere? Just to manage expectations regarding NPs being able to say, for example, dwellings can go anywhere in their parish.

Page 6 – again, care needs to be taken here – there are local plan strategic policies that say where dwellings can and can't go and this needs to be mentioned.

Page 9 – para above the title – this is a bit cryptic and may need elaborating.

Page 18 – again, some context here is needed. The new NPPF at para 76a says such sites need to be adjacent to existing settlements and talks of other requirements. I would suggest that issues like social isolation and access to services and facilities and integration into communities needs to be mentioned. Again, care needs to be taken as it is about the right house in the right place.

Page 57 – another opportunity to refer to access to services and facilities and the issue of social isolation.

Appendix 3 – Strumpshaw Neighbourhood Plan – review

Strumpshaw Parish Council

Document: www.strumpshaw-pc.gov.uk/neighbourhood-plan

Due date: 17 March 2025

Status: Regulation 14

Proposed level: Planning Committee endorsed

Notes

The first Neighbourhood Plan for Strumpshaw parish was adopted by Broadland District Council and the Broads Authority in July 2014, following a successful local referendum held on 22nd May 2014. 188 (66 per cent) of voters were in favour of the Neighbourhood Plan being used to help decide planning applications in the area. Ten years on, the parish has revisited the Neighbourhood Plan, undertaken further consultation, and written a revised set of policies to meet the current and future needs of the area.

Proposed response

Comments on Neighbourhood Plan

1.3 The policies in the July 2014 adopted Neighbourhood Plan can be found in chapter 4 ~~and~~ along with a description of why they have been reviewed.

Throughout - references to NPPF need checking and updating as the most recent one is 2024.

1.5 as well as desk-based research.

1.7 and 1.8 – I have not seen people named in a NP document before...

2.1 – refer to the Broads Authority

Figure 3 – show BA area on plan

2.2 – the Local Plan for the Broads does not say this.

Footnote 3 - link does not work.

Throughout - as this is a planning document, don't say 'Broads National Park' – say 'Broads' and that the Broads has a status equivalent to a National Park.

2.9 – not sure if referring to the 2006 Broadland Local Plan is relevant.

2.9 – need to refer to the LCA for Broads Authority.

2.12 – It lists 2014 services. We are in 2025 – what is Strumpshaw served by now? The list of the current provision would be helpful.

2.18 – adoption likely to be mid 2026

Images need alt text

Social objective 2 – what about other forms of lighting?

Figure 17 – I can't see a settlement boundary on the plan.

Policy STR1

- You say 'extended settlement boundary' – are you extending it then as part of this Local Plan? Or are you referring to the settlement boundary as set out in the GNLP? If the latter, isn't just 'the settlement boundary'?
- third bullet point – would '...and heritage history of the area' be better?
- Under location and scale – but if they are in the development boundary, how does needing to be 'near community facilities' work? And what is 'near'?
- You say 'district level' – what does that mean? The Broads Authority is not a 'district', but we are a Local Planning Authority and have a Local Plan.

6.2 – The BA LCA probably needs referencing.

Footnote 12 - link is broken.

Figure 17, page 26: the symbol for non-designated heritage assets on the key appears to be different to that on the map (e.g. on the map the pink circles are infilled with colour)

Figure 17, page 26: Are there any 'Natural assets' shown on the map? There is a symbol in the key but can't see any green circles on the map. Is it because they too are infilled in the map and blend in with the other green areas? Remove the symbol from the key if there are not any on the map.

Figure 17, page 26: are there not any important views along the river, for example at RSPB Strumpshaw? Or along the track from Station Road to the Strumpshaw pumphouse?

Policy STR2 Design guidelines and code: In the first para I think the phrase 'and be physically integrated where possible' could be expanded on as I'm not clear what it means. I am guessing that it means physically located within the settlement but clarification is required.

Policy STR5 – what does requiring 10% BNG add to mandatory BNG? Is it in addition? Also, to what development proposals does this apply? What about those that are exempted from mandatory BNG by regulations?

Para 5.34, page 39 The last sentence regarding NCC being able to provide high level archaeological advice does not seem to relate to this section on NDHAs. That might be better placed under 5.32 the list of designated heritage assets, maybe in a section on archaeology, where it can be stated that NCC would be consulted on archaeological implications of any new development (this would happen through the local planning authorities during their consultation on planning applications). Any SAMs and any areas of archaeological interest identified on the Norfolk HER within the parish could also be listed?

Page, 40 para 5.35 add 'when a **planning** application is being determined'.

Page 40, para 5.36 could perhaps re-word the first sentence to something like, 'The following is a list of proposed non designated heritage assets. Where building owners objected to their inclusion they have been removed from the list'.

Page 40 – list of NDHAs – Buckenham Railway Station has group value with other stations on the line; Buckenham Ferry Drainage Mill has group value with other drainage mills in the Broads

Page 40 – list of NDHAs –The Hollies – it states 'substantial residence newly built by Barnes family' but then dates it to early 1800s – clarification with wording required.

6.11 – you might want to refer to the [Broads Nature Recovery Strategy 2024-29](#)

6.17 A range of answers came back and were used to inform policy STR7.

6.18 – seems logical to say that dark skies is addressed in the Local Plan for the Broads.

STR9

- I would suggest that the four elements need to be separated out to 4 different points. A couple of points are in the same para and are not really related and could be lost:
 - Development proposals should take account of the existing dark skies in Strumpshaw parish (figure 41) and limit the impact of light pollution from artificial light.
 - Street lighting will not be supported on any development.
 - For new individual dwellings and businesses, lighting necessary for security or safety should be designed to minimise the impact on dark skies by, for example, minimal light spillage, use of downlighting, movement sensitive lighting and restricting hours of lighting.
 - Lighting likely to cause disturbance or risk to wildlife will not be supported.
- Uses the word 'should' whereas other policies use much stronger wording. Why is that?
- Would it be logical to say that proposals for new lighting need to be fully justified in the first place? Also, did you want to mention anything about light spill from internal lighting such as glazed facades and roof lights and that this needs to be mitigated?

6.24 – isn't the issue 'surface water **flooding**' rather than drainage?

STR10

- What is 'immediate vicinity'?
- How do you expect a scheme to 'take account of all relevant evidence of flooding'?
- In the preceding supporting text, you don't talk about sewerage system having issues. What are the issues here? Are you on mains sewerage? What is development meant to do?

7.1 and 7.2 – are there peak hour, weekday services serving these bus stops?

7.4 – could you use a pie chart to compare the census data?

7.5 – I think you mean that the intermittent nature of the footway provision affects the safety of pedestrian movement – as written, it could be read as the footway affects the safety.

7.6 – what are average speeds compared to the speed limit?

STR13 – refers to policy X

STR13 - As part of the Examination into the Local Plan for the Broads, the Inspector amended DM44...

...from...

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; and*
- c) Details of consultation with the community regarding the change of use or redevelopment are provided; and*
- d) There is an equivalent facility available or one is made available prior to the commencement of redevelopment, to serve the same need in an equally accessible and convenient location.*

...to...

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.*

(part c from the original is elsewhere in the adopted policy).

Essentially, the 'equivalent facility' clause was removed. The Inspector said in her report:

97. Criterion d in Policy PUBDM43 allows the loss of community facilities where an equivalent facility is available. This could lead to the loss of valuable facilities in villages and fail to protect rural communities. The criterion should therefore be deleted, in order to ensure the policy is effective and consistent with national policy relating to the rural economy and healthy communities (M63).

STR13 – last part about other types of community infrastructure – did you want to say ‘subject to other policies in the Development Plan’ like you do elsewhere?

STR14

- ‘A sympathetically designed small car park’?
- What about cycle parking?
- When you say ‘increased biodiversity’ do you mean ‘appropriate proposals to increase the biodiversity value of the site’ or something like that?
- Anything about litter or dog bins?

10.1 – do you want to say there is no CIL in the Broads area?

10.5 – LPAs are required to review their Local Plan every 5 years. And you need to mention the Broads Authority as well.

Comments on Design Guide

Page 16 – guidance in middle column refers to figure 08. Figure 08 does not really provide explanation – what is important in figure 08 for it to be referenced in the guidance?

Page 16 – Figure 09 seems important, but is not referenced anywhere.

Page 23 – what are the ‘positive architectural elements’? What are the ‘traditional styles’? There is no talk of these as far as I can see.

Figure 29 – title talks about new homes, description talks about existing and new build and there are letters and numbers and one set is purple and one set is orange... not clear what I am looking at and how to use it. Also not clear how this relates to building regulations.

3.5.1 – no mention of potential for wildlife features as part of new development.

3.5.2 – just say Broads.

3.5.3 – no mention of the area being in water stress and no reference to the commitment by LPAs in Norfolk to at least 110l/h/d.

3.5.6 – would welcome reference to not adding to light pollution as some EV charging points have lots of lights on them and the Broads has intrinsic dark skies.

Page 8 – NPPF **2024**

Page 22 – Loft conversions – change ‘should’ to ‘will’ in sentence on ‘additional considerations **will** apply’

Table on page 25 – I don’t understand what the numbers relate to (e.g. 1:3 to 1:5). It should either remove these or make clear what they are.

Appendix 4 – Broadland and South Norfolk draft joint Custom and Self-Build Housing Supplementary Planning Document

Broadland Council and South Norfolk Council

Document: [Joint Supplementary Planning Documents for Broadland and South Norfolk Councils | Broadland and South Norfolk](#)

Due date: 21 March 2025

Status: Draft

Proposed level: Planning Committee endorsed

Notes

Broadland District Council and South Norfolk Council are seeking views on their draft joint Custom and Self-Build Housing Supplementary Planning Document (SPD). The draft SPD provides guidance and information for people wanting to submit planning applications for self and custom build, including detail regarding the interpretation and implementation of policies in the Greater Norwich Local Plan (GNLP) which was adopted in March 2024.

Proposed response

5.5: third bullet point, formatting and position of brackets.

There is not much mention of landscape impact of proposals, especially when adjacent to a settlement. Linked to this, a mention of impact on the setting of the Broads would be welcomed. It should be noted that the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023, amended Section 17A of the Norfolk and Suffolk Broads Act 1988. Section 17A which creates a general duty of public bodies, and this was amended to replace ‘shall have regard to’ with ‘must seek to further’ as follows:

- (1) In exercising or performing any functions in relation to, or so as to affect, land in the Broads, a relevant authority ~~shall have regard to~~ **must seek to further** the purposes of—
- (a) conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
 - (b) promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
 - (c) protecting the interests of navigation.

This website defines public bodies – it seems National Highways would fit the explanation:

[Public bodies - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/public-bodies)

The special qualities are listed here: [The Local Plan for the Broads Review: Preferred options consultation \(broads-authority.gov.uk\)](#) at page 26, section 7.14