

# Planning Committee

13 September 2024

Agenda item number 9

## Consultation responses

Report by Planning Policy Officer

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### Summary

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

### Recommendation

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

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## 1. Introduction

- 1.1. Appendices 1 and 2 show selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.

## 2. Action required

- 2.1. The Committee's comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 27 August 2024

[Appendix 1 - Regional Energy Strategic Plan policy framework consultation](#)

[Appendix 2 – South Norfolk Village Clusters Housing Allocation Plan](#)

# Appendix 1 – Ofgem

Document: Regional Energy Strategic Plan policy framework consultation.

[Regional Energy Strategic Plan policy framework consultation | Ofgem](#)

**Due date:** 08 October 2024

## Notes

In our November 2023 future of local energy institutions and governance decision, we confirmed the introduction of a new regional strategic planning function delivered by the National Energy System Operator.

The Regional Energy Strategic Plan (RESP) will enable the coordinated development of the energy system across multiple vectors, provide confidence in system requirements and enable network infrastructure investment ahead of need. Ultimately, this will support the energy system's transition to net zero in a cost effective manner.

This consultation follows on from our November decision and sets out our proposed policy framework for the RESP, alongside a series of questions for consideration. We are seeking input from stakeholders on three primary areas:

RESP building blocks – we propose each RESP should include a long-term vision alongside a series of directive strategic net zero pathways that show energy projections and guide system need. The RESP should be developed collaboratively and based on relevant local and national data inputs.

Regional governance – we propose each region should have a Strategic Board, made up of local and devolved government and network company representatives. The Strategic Board should facilitate transparency, heighten visibility of regional priorities and provide oversight of the RESP development.

Boundaries – we propose eleven regions across Great Britain. One region covering Wales, one region covering Scotland and a further nine regions covering England.

## Proposed response

The document would benefit from checking the terminology used is correct and appropriate. In some places there is reference to local plans and then local energy plans. For example, para 3.57 – I am not sure this Framework can produce a Local Plan – perhaps it means a Local Energy Plan.

Lots of mention of planning and planning process and planning area and spatial planning but not sure every mention is relating to local planning as related to a Local Planning Authority. This needs a check through.

There are numerous different references throughout the document that could mean the same thing: local authorities, local government, local democratic institutions, local government infrastructure bodies. I am not sure what the last two are. I would suggest consistency. However, see next point.

There is no mention of National Park Authorities and the Broads Authority. We are not councils, local authorities, local government, local democratic institutions or local government infrastructure bodies. We are Local Planning Authorities though. I wonder if you should just be using the term 'Local Planning Authority' throughout?

We would welcome some reference to protected landscapes and the National Park Authorities and Broads Authority.

4.15 – how will protected landscapes be represented?

4.22 –Not just district councils but also National Park Authorities and the Broads Authority.

I cannot see mention of using the pre-application advice that Local Planning Authorities provide for schemes.

There are some considerations that the kind of proposals that this document relates to need to consider;

- Peat – peat is a finite resource with many special qualities such as carbon sequestration. It can be excavated as a by-product of development. If it dries out, it becomes a carbon source. Schemes need to take care in relation to location and routing of pipelines and consider impact on peat.
- Protected landscapes – there is no mention in the document of protected landscapes. Clearly, energy projects could have impacts on the landscape. Protected Landscapes are treasured locally, nationally and indeed internationally and the document needs to refer to protected landscapes.
- Light pollution – some schemes tend to have lighting. The lighting is not often designed that well. The document could usefully refer to lighting and light pollution and dark skies and working with experts to produce lighting plans that show how the proposals will look at night. There are many dark areas in the UK and light pollution needs to be a consideration.

## Appendix 2: South Norfolk Council

Document: Village Clusters Housing Allocation Plan (VCHAP)

[www.southnorfolkandbroadland.gov.uk/vchap](http://www.southnorfolkandbroadland.gov.uk/vchap).

**Status:** Addendum to the Regulation 19 version

**Due date:** 07 October 2024

### Notes

The proposed Addendum includes the additional and amended sites proposed for allocation within the VCHAP to address this shortfall. The document also includes a number of other focused changes to the proposed VCHAP. The published document only deals with the changes that are being proposed to the Regulation 19 VCHAP document that was published in 2023.

### Proposed response

#### Light pollution

Most of the proposed sites are on the edge of settlements. Particular care and attention need to be given to any proposals for external lighting as well as any design that has a lot of glazing. Lighting in such edge of settlement areas needs to be fully justified, serve a specific purpose, be of the right design and intensity so as to not affect dark skies, such as the intrinsic dark skies of the Broads. Reference to lighting being only needed if fully justified and well designed needs to be made in relevant policies, especially the following as they are close to, albeit separated from, the Broads. Also, design with lots of glazing need to be avoided unless there is going to be automated shades incorporated into the design.

- Policy VC BRM1: Land west of Old Yarmouth Road
- Policy VC EAR2: Land north of The Street
- Policy VC GIL1REV: South of Geldeston Road and Daisy Way

We recommend that for sites on the edge of settlement you include wording such as: 'Given that this site is on the edge of the settlement, particular care and attention will be given to lighting of such schemes. This includes external lighting, as well as mitigation for designs with lots of glazing. Schemes will need to fully justify the need for lighting, provide detail of the design and ensure that lighting is on only when it is needed, and designed to not add to light pollution. Designs with a lot of glazing are required to provide mitigation in the form of automated shades that are shut between dusk and dawn.'

### **Policy VC GIL1REV: South of Geldeston Road and Daisy Way**

Our concern is incremental pressure and expansion of development around Gillingham. Again, one of the main concerns is lighting and so consideration of lighting is of particular reference to this policy.

The policy states: 'The boundary of the site incorporates areas at both surface and fluvial (Zones 2 and 3a) flood risk in the south-western corner and a remaining small area of tidal flooding in the southeast corner, which it is recommended are left undeveloped.

Development of the site will require a site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site'. This should be made stronger and state 'which must be left undeveloped' as it is not acceptable to be allocating development in Zones 2 and 3a.

It also states; 'The developer of the site is recommended to enter into early engagement with Anglian Water...'. Again, this should be stronger – to say 'must'.

### **Policy VC BRM1: Land west of Old Yarmouth Road**

The text says, 'The developer is therefore encouraged to enter into early engagement with AW regarding this matter'. This should be stronger – to say 'must'.

### **HAD1 Land south of Haddiscoe Manor Farm**

Don't need the word 'that' in the first sentence, it doesn't make sense of the bullet points following.