

Planning Committee

10 January 2025

Agenda item number 12

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.

Author: Natalie Beal

Date of report: 18 December 2024

Appendix 1 – Planning Policy consultations received

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Great Yarmouth Borough Council

Document: Regulation 19 Local Plan: [Great Yarmouth Pre-Submission Local Plan \(localplan.great-yarmouth.gov.uk\)](http://localplan.great-yarmouth.gov.uk)

Due date: 31 January 2025

Status: Regulation 19

Proposed level: Planning Committee endorsed

Notes

This is the last stage of Local Plan production. The Borough Council will then submit the Local Plan for examination.

Proposed response

Summary of response

Some comments are not soundness issues; just minor comments to be considered. But there are soundness issues for some policies as they do not adequately refer to the potential for development to impact the Broads.

Minor comments – not soundness

These comments are observations and suggestions. Some relate to missing words others are minor in nature but could result in improvements to the plan.

3.4 says ‘Site specific policies and policies in the housing section of this plan aim to help meet these specialist needs’

4.49 – a minor comment – could there be scope for a viewpoint towards Breydon Water from the waterfront, at the apex of the curved water frontage?

8.4 – some of these sites may be immune to planning enforcement. There is work ongoing regarding this. We will keep you updated.

Policy RUR1 – on a couple of occasions in the policy, it refers to ‘in accordance with the above proportion’. Not sure what the phrase in this context actually means.

Policy RUR2 - D – the policy refers to schemes in the countryside, but D refers to a village. 6.236 then refers to rural settlements. Need to be consistent with terminology.

RUR6 – recommend mention lighting in there as often equestrian development is on the edge of settlements and often has lighting included.

NAT 7 – our LCA and LSS are being updated. They should be in place before this Local Plan is adopted – you will need to check their status so reference can be correct.

Soundness concerns

We welcome the wording in these policies:

- RUR6 Equestrian development: the scale of development is appropriate to the setting of the area, particularly where the setting of the Broads is relevant;
- TCL2 New Tourist Accommodation: reflect the character of the landscape and local rural setting, including, where relevant, the setting of the Broads, being well-screened to protect the sensitive setting of the landscape.
- TCL3 New Tourist Attractions outside of Development Limits and existing tourist areas: are sympathetic to the surrounding landscape, including the setting of the Broads;
- CLC4 Renewable and Low-Carbon Energy Development: The character and sensitivity of the surrounding landscape, including the setting of the Broads, and designated landscape features;

However, we request such wording is included in these policies as well;

- RUR2 Self-Build Residential Development in the Countryside – this policy will allow small scale residential development outside of development limits which could impact on the Broads and its setting.
- RUR3 Conversion of rural buildings to residential uses – this policy will allow small scale residential development outside of development limits which could impact on the Broads and its setting.
- RUR4 Rural worker dwellings – this policy will allow dwellings outside of development boundaries and away from built up areas, like TCL3. So similar wording to TCL3 relating to setting of the Broads is required.
- RUR5 Farm Diversification – this policy could allow new development in rural areas, away from built up areas like TCL3. So similar wording to TCL3 relating to setting of the Broads is required.
- HOU3 Affordable Housing Exception Site – this policy will allow residential development outside of development limits which could impact on the Broads and its setting.
- HOU5 Housing for Older People – this policy will allow residential development outside of development limits which could impact on the Broads and its setting.
- EMP1 New employment development – this policy could allow employment uses outside of development limits which could impact on the Broads and its setting.
- EMP2 Protected Employment Sites – some of these sites are near to or next to the Broads and development could impact on the Broads and its setting.
- EMP3 Digital Infrastructure – this policy will allow telecommunications infrastructure to be built. Such infrastructure could affect the Broads and its setting. So again, similar wording to TCL3 is required and consideration of the Broads LCA.
- HEC4 Community Facilities – this policy will allow community facilities outside of development limits and development could impact on the Broads and its setting.
- TCL1 Existing Holiday Parks – some of these are up to the boundary of the Broads and changes could impact on the setting of the Broads.
- DHE6 Advertisements – some signs could be illuminated, or their design could impact on the landscape.

How these concerns can be addressed:

- RUR2 Self-Build Residential Development in the Countryside: a new criterion that says: **proposals are sited and designed to minimise any unacceptable impact on the character**

and sensitivity of the surrounding landscape, including the setting of the Broads, and designated landscape features,

- RUR3 Conversion of rural buildings to residential uses: a new criterion that says: **Proposals will be designed to be appropriate to the setting of the area, particularly where the setting of the Broads is relevant**
- RUR4 Rural worker dwellings: a new part f that says ‘are sympathetic to the surrounding landscape, including the setting of the Broads’
- RUR5 Farm Diversification: h could be expanded to say ‘the scale and nature of the development is not intrusive to the surrounding landscape **and are sympathetic to the surrounding landscape, including the setting of the Broads’**
- HOU3 Affordable Housing Exception Site: amend this paragraph of the policy: ‘All exception site proposals must demonstrate that the scheme’s impact on the surrounding landscape and character, visual impact, overall footprint and intensity of the use is **appropriate to the setting of the area, particularly where the setting of the Broads is relevant and is** considered proportionate to the existing settlement’
- HOU5 Housing for Older People: amend i) as follows: ‘It is of a scale, height and design that appropriately accommodates its relationship to surrounding land uses and landscape, **including the setting of the Broads,** particularly where located at edges of settlements’.
- EMP1 New employment development: amend b) as follows: ‘its scale is rural in character and sensitive to surroundings, **including the setting of the Broads,** and well-related to existing settlements’;
- EMP2 Protected Employment Sites: add a new criterion that says: **Proposals will be designed to be appropriate to the setting of the area, particularly where the setting of the Broads is relevant’**
- EMP3 Digital Infrastructure: amend a) as follows: ‘The installation and any associated apparatus is sited and designed to minimise any unacceptable impact on visual and residential amenity, highway safety, the historic environment, and the **character and** appearance of the area where it would be sited **and the character and sensitivity of the immediate and surrounding landscape, including the setting of the Broads, and designated landscape features,** including through the use of innovative design and construction and/or sympathetic camouflaging and landscaping’
- HEC4 Community Facilities; amend first paragraph of policy: ‘Proposals for new community services and facilities will be permitted within and outside of Development Limits, if the proposal meets the needs of the local community, is of a proportionate scale, is well related to the settlement which it will serve and would not adversely affect existing facilities that are more easily accessible and available to the local community. **Proposals will be designed to be appropriate to the setting of the area, particularly where the setting of the Broads is relevant’**
- TCL1 Existing Holiday Parks: add another paragraph under the bulleted criteria that says **‘Proposals will be designed to be appropriate to the setting of the area, particularly where the setting of the Broads is relevant’**
- DHE6 Advertisements: amend first part of the policy as follows: ‘In assessing advertisement proposals in terms of amenity, regard will be given to the local characteristics of the area in terms of potential impact on the scenic, historic, architectural, landscape or cultural setting, and whether it is in scale and in keeping with these features, **including protected landscapes and their setting’.**

Burth Castle policies – soundness objection

The supporting text highlights the need for a sensitive design approach in relation to the Broads area to the north and west, with mention of unsuitable boundary treatments and the need for screening. I am pleased to see that a landscape strategy would be required in accordance with the site-specific policy. There is however no mention of the potential need to assess the visibility of the site, and the landscape strategy should be informed by a landscape and visual appraisal. This would be necessary to inform potential building heights and limit them if necessary, on the more sensitive areas of the site. This would also be an opportunity to identify and mitigate any visibility from the sensitive Burgh Castle ruins site.

Martham policies – soundness objection

The need for a sensitive design approach is highlighted, and a landscape strategy is required which provides retention of existing valuable features and inclusion of new screening. However, there is no mention of any landscape and visual appraisal informing this landscape strategy. This would be the only way of determining important views towards and potentially out of the site to help inform which parts of these site have more capacity to accommodate greater height etc and which might need to be kept more open. This would also help inform where the open spaces would be best located.

Fleggburgh – soundness objection

There is no way of determining how visible the site is from the Broads without a suitable appraisal being carried out, which should inform appropriate measures to either screen or transition from the settlement edge to rural countryside.

Soundness test

Effective – the impact of development on the Broads and its setting, which is of equivalent status to a National Park, is a cross-boundary issue.

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] 2
 - (c) protecting the interests of navigation.

The special qualities are listed here in the Broads Plan: [Introduction](#).