

# Planning Committee

07 February 2025

Agenda item number 10

## 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 response.

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## 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 and endorsement are invited.

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Date of report: 10 January 2025

Appendix 1 – [Postwick with Witton Neighbourhood Plan Pre-Submission Regulation 14 Consultation](#)

Appendix 2 – [Planning Reform Working Paper: Development and Nature Recovery](#)

# Appendix 1 – Postwick with Witton Neighbourhood Plan Pre-Submission Regulation 14 Consultation

## Postwick with Witton Parish Council

**Document:** [Postwick with Witton Neighbourhood Plan Pre-Submission \(Reg 14\) Consultation](#).

**Due date:** 29 January 2025

Draft comments have been sent in and will be confirmed following Planning Committee.

**Status:** Regulation 14

**Proposed level:** Planning Committee endorsed

### Notes

Postwick with Witton Parish Council, as the qualifying body, is now consulting on the Pre-Submission Draft of the neighbourhood plan for Postwick with Witton Parish. This consultation is in line with Regulation 14 of the Neighbourhood Planning Regulations (2012) and will run for a period of 6 weeks from Wednesday 18th December 2024 to Wednesday 29th January 2025.

### Proposed response

#### Summary of response

The Neighbourhood Plan is welcomed. There are some clarifications sought and some amendments suggested.

#### Comments on the Neighbourhood Plan

Para 2 says this which does not read well: There is also a number of businesses are Small to Medium Sized Enterprises, though there are some large employers including Broadland and South Norfolk Council.

Para 4 – Park not Pk

Vision, para 2, second sentence is written bluntly when compared to the rest of the vision.

Policy PW1 – the last bit says that proposals should use design and access statements to demonstrate how the priorities have influenced development. But what if there is no design and access statement? Do you want a proportionate statement submitted with applications for example?

Page 14 – there are two local plans. So calling one ‘the local plan’ could get confusing. Why not say ‘Greater Norwich Local Plan (GNLP)’ and ‘Local Plan for the Broads (LPB)’ or something similar. That way, you say which Local Plan you are referring to.

Para 16: Further land for commercial growth **is** also allocated in this area.

Para 17: Any proposal that is operational beyond daylight hours will impact on the nocturnal environment and create additional light additional pollution.

Policy PW3: Not in our area, but some thoughts for you to consider.

Some proposed amendments to the existing wording to consider.

Proposals for the mixed-use development of Land South of Smea Lane ~~are~~will be strongly supported where they can be shown to provide a mix of housing to meet local need and associated social infrastructure. This includes a new school, creche, community hall and nursery, as detailed in the Growth Triangle Area Action Plan, unless it can be demonstrated that these are no longer required to meet local need.

But I feel it could be written more clearly. Something to consider:

Proposals for the mixed-use development of Land South of Smea Lane will be strongly supported where they can be shown to provide a mix of housing to meet local need. Proposals need to provide social infrastructure, which includes a new school, creche, community hall and nursery, as detailed in the Growth Triangle Area Action Plan, unless it can be clearly demonstrated through a bespoke, local assessment, that these are no longer required to meet local need. Proposals need to include a phasing plan for the delivery of the social infrastructure.

Para 23 – some development is exempt from CIL.

Para 23 – last para – the Broads does not have CIL in place.

Page 25

Consider additional biodiversity enhancements:

Linking up of existing greenspace

Swift and other bird and bat boxes/integrated bricks in housing developments (and rather than or)

Inclusion of ponds/open water as part of developments (there are core areas identified in the Great Crested Newt opportunity maps for the Postwick area)

Page 26 - Inclusion of importance of mature trees for roosting bats and trees/hedgerow corridors for commuting bats. Emphasis on avoidance of loss and recognition of bats as a protected species, reliant upon these key habitat features.

Para 32 - where there is a fairly extensive network ~~of~~of cycleways

Para 34 – first sentence doesn't read well

Para 43 – first sentence – maybe say you are referring to within the parish.

Font error on word 'six' on page 43

All images need alt text

Policy PW5 – do you plan to have a community action that works with the landowners to deliver paths A and B? Do you want the routes to be safeguarded from development proposals?

Para 61 sounds important, but I do not understand it. What are you trying to say and identify here? Are these areas mapped? What status do you want these areas to have? It is not clear.

PW6 – the areas in Figure 10 need to be identified on a map.

PW6 – what size buffer zones? What do you class as sensitive sites?

Para 68 – if no design and access statement required, how do you want an applicant to demonstrate they meet these requirements relating to trees?

PW7 – did you want to use the mantra of the right tree in the right place?

PW7 para 2, second sentence: is this clearer: An Arboricultural Impact Assessment is required to accompany applications where trees are present or could be impacted by proposals. ~~on a site for new built development or where trees could be impacted through a householder application.~~

Para 70 This includes barn owl, water vole, otter, hedgehog, soprano pipistrelle and barbastelle bats.

Should the text at para 79 be near the dark skies policy PW12 which is around para 85?

PW12 – why do you use the word ‘encouraged’ in the first sentence rather than a stronger term like ‘must’? The second sentence is stronger as it uses the phrase ‘need to’.

Para 93: Off-white render is another common ~~M~~material.

PW13 says: ‘For all new development it must be demonstrated how water management solutions have been considered at an early stage of the planning process’. What are ‘water management solutions’? What is water management in this instance?

PW13 says: ‘Extensions or modifications should retain the existing number of parking spaces on a site’. Extensions or modifications to what?

General: Feedback from our LCWIP consultation regarding Postwick was around safer roads for cycling and having segregated cycle paths leading into the countryside and into the city. The Countywide LCWIP has been written and only mentions a cycle link between Postwick park and ride and Brundall station so I would like more emphasis to be put on safe cycle routes in Postwick. The plan mentions it but it feels like an afterthought at the end of the plan.

## **Evidence base**

Should Appendix A be updated as it runs to September 2023?

## **Design Guide**

### **1.1 – Broadland District and the Broads Authority**

Say somewhere that the Broads has a status equivalent to a National Park.

3.1.7 – refer to Broads Authority intrinsically dark skies

03.AM.3 – parked cars on the road slow vehicles down and so can be a good thing. There is also no mention of preventing pavement parking.

Page 41 – 4.4.5 incorporates another 4.4.1. Looks like a formatting and numbering issue.

04.AM.5 – how about justifying the need for lighting in the first place?

The questions from page 48 onwards – where relevant, mention the Broads specifically.

## Appendix 2 – Planning Reform Working Paper: Development and Nature Recovery

Ministry of Housing, Communities and Local Government and  
Department for Environment, Food and Rural Affairs

**Document:** [Planning Reform Working Paper: Development and Nature Recovery](#)

**Due date:** None

**Proposed level:** Planning Committee endorsed

### Notes

This paper invites views on proposals for a new approach to how housing and infrastructure development can meet its environmental obligations and contribute to nature recovery. The Government wants to accelerate development while going beyond simply offsetting harm to unlock the positive impact this development can have in driving nature recovery. This new approach would use funding from development to deliver environmental improvements at a scale which will have the greatest impact. These working proposals reflect feedback already received from representatives of the development industry, nature conservation organisations, nature service providers, and local government. If taken forward, the Government would use the Planning and Infrastructure Bill to make the necessary legislative changes with the intention of establishing a more efficient and effective way for the Habitats Regulations and other environmental obligations to be discharged, pooling individual contributions to deliver the strategic interventions necessary to drive nature recovery. A series of questions are posed at the end of the paper to inform further discussions before determining whether these proposals are taken forward

### Proposed response

#### General comments

Generally, we can see where the principle of this more strategic approach would be beneficial. It follows the thinking of many current conservation initiatives with the need to think bigger and more joined up to address the scale of biodiversity loss. That being said, it needs to be acknowledged that paying into a nature restoration pot is just step 1. The concern is that the working paper lacks detail particularly around the implementation of this approach.

Natural England as the delivery body would need to be appropriately resourced to be able to ensure this funding is spent on achieving real environmental benefits. Appropriate funding would need to be secured for NE to retain their resources.

We also note that National Parks/The Broads are in a good position to be receptacles for nature recovery.

Local Nature Recovery Strategies should provide a guiding framework for targeting and spending ear-marked development money, but ‘positive environmental outcomes’ such as securing habitats are often dependent on private landowners and other competing land

uses/schemes. These are not guaranteed. Once the development is granted and the tariff paid, what assurance is there that a suitable spend can and will occur? The governance, resources and separate core funding for NE need to be in place before such a scheme comes into effect.

**Answers to questions:**

- a. Do you consider this approach would be likely to provide tangible improvements to the developer experience while supporting nature recovery?

This approach has the potential to improve better nature recovery outcomes through a strategic, landscape-scale focus. It could enable larger-scale restoration projects, benefiting nature in the long term. However, there is a risk that local communities may experience negative consequences from developments with few local benefits. It is essential that the Government's plans do not undermine the mitigation hierarchy, which prioritises avoiding environmental harm first. Effective funding for agencies such as Natural England (NE) and local authorities is crucial to help facilitate engagement with developers, farmers, and landowners. Currently, the system's shortcomings—particularly the lack of resources for planning officers and ecologists—have hindered effective environmental management. A long-term funding model, coupled with ongoing collaboration and consensus-building, is key to delivering tangible environmental outcomes and coping with climate adaptation challenges.

- b. Which environmental obligations do you feel are most suited to this proposed model, and at what geographic scale?

The primary focus of any development should be on avoiding negative impacts on the natural environment, especially in protected landscapes and sites. For example, nutrient neutrality is critical in such areas, and the government's Nature Restoration Fund should not replace existing environmental protections or the responsibility of developers to avoid harm. This model should focus on avoiding adverse impacts first and then ensuring mitigation measures where necessary. The geographic scale of the model should ideally align with catchment areas or broader landscapes, particularly where upstream land management is essential for protecting environmental outcomes.

- c. How if at all could the process of developing a Delivery Plan be improved to ensure confidence that they will deliver the necessary outcomes for nature?

A catchment-scale Delivery Plan, particularly for nutrient mitigation, could offer an effective way forward. By taking a holistic, landscape-scale approach to planning, we can better address cumulative environmental impacts, enhance ecosystem resilience, and ensure that nature recovery strategies are tailored to specific local needs. This will help build confidence that the necessary outcomes for nature are being met, as it addresses multiple factors within a cohesive framework.

- d. Are there any additional specific safeguards you would want to see to ensure environmental protections and / or a streamlined developer experience?

While landscape-scale nature restoration projects are important, particularly in National Parks/The Broads, it is equally crucial to deliver local habitat creation. Local projects ensure that environmental protections are in place close to the development sites and can deliver immediate, tangible benefits. Safeguards should include a clear requirement for developers to demonstrate how they will minimise harm to the local environment and provide specific, measurable actions for biodiversity restoration at the local level. Additionally, ensuring robust long-term monitoring and engagement will help mitigate unintended consequences and foster a stronger relationship between developers and local communities.

- e. Do you support a continued role for third parties such as habitat banks and land managers in supplying nature services as part of Delivery Plans?

Yes, habitat banks and land managers play an essential role in supplying nature services as part of Delivery Plans. Their involvement can ensure that ecological restoration projects are implemented effectively and provide tangible benefits for the environment. They can also help scale nature recovery by facilitating the necessary land management and habitat creation, and by offering valuable expertise in managing natural resources. Continuing to include them in the process will enhance the overall effectiveness of the Delivery Plans.

- f. How could we use new tools like Environmental Outcomes Reports to support this model?

Environmental Outcomes Reports (EORs) can be used to track and document the effectiveness of mitigation measures, ensuring that environmental obligations are being met. These reports could also provide developers and other stakeholders with a clear understanding of the environmental impacts of their projects and guide future decision-making. By using EORs to assess the success of interventions and adjust strategies as needed, the model will have greater transparency, and stakeholders will have more confidence that the required outcomes are being achieved.

- g. Are there any other matters that you think we should be aware of if these proposals were to be taken forward, in particular to ensure they provide benefits for development and the environment as early as possible

It is important to address the long-term funding and support for the agencies involved in delivering environmental protections and mitigation. Without adequate resources, the risk exists that nature recovery will be undermined or delayed. Furthermore, clear and consistent communication with stakeholders—including landowners, developers, and local communities—is key to ensuring that environmental benefits are achieved early in the process. Effective collaboration and long-term planning, including around enforcement, will be necessary to ensure that these proposals support both development and environmental recovery in a balanced and sustainable way.