

## **Draft Policy LP16 Design and Sustainable Development**

**Link to draft policy and comments in full received from the draft consultation stage:**

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883454380#section-s1542883454380>

### **Consideration of issues:**

The main issues raised by consultees were:

- Need to require health impact assessments;
- Need to include/cover waste water requirements;
- Lack of evidence base to support inclusion of nationally described space standard.

The resulting changes recommended to the policy and supporting text are set out below.

### **Officer Recommendations to Task Group:**

The Task Group is recommended to:

**1)**

## Policy Recommendation:

### Strategic Policy

#### Policy LP16 Design and Sustainable Development

1. All new development in the borough should be of high quality design.
2. **Where relevant** new development will be required to demonstrate its ability to:
  - a. **Conserve Protect** and enhance the historic and natural environment and reduce environmental risks;
  - b. enrich the attraction of the borough as an exceptional place to live, work and visit;
  - c. respond to the context and character of places in West Norfolk by ensuring that the scale, density, layout, materials and access will enhance the quality of the environment;
  - d. where possible, enhance the special qualities and local distinctiveness of the area (including its historical, biodiversity and cultural character), gaps between settlements, landscape setting, distinctive settlement character, landscape features and ecological networks.
  - e. optimise site potential, making the best use of land including the use of brownfield land;
  - f. enhance community wellbeing by being accessible, inclusive, locally distinctive, safe and by promoting healthy lifestyles (see Policy LP32 Community & Culture);
  - g. achieve high standards of sustainable design.
3. To promote and encourage opportunities to achieve high standards of sustainability and energy efficiency, **development proposals will be required to demonstrate should include:**
  - a. the use of construction techniques, layout, orientation, internal design and appropriate insulation maximised to improve efficiency;
  - b. the innovative use of re-used or recycled materials of local and traditional materials to decrease waste and maintain local character;
  - c. the reduction of on-site emissions by generation of cleaner energy **where appropriate;**

- d. within larger developments of sufficient scale the provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area and the integration of the development into the GI network, or the creation of linkages to it wherever possible;
- e. the provision of good access links for walking and cycling;
- f. the promotion of water efficiency - all new housing must meet Building Regulation requirement of 110 l/h/d. Non-domestic buildings should as a minimum reach 'Good' BREEAM status;
- g. the incorporation of multifunctional Sustainable Drainage Systems (SuDS);
- h. designs that exceed the present standards set by Building Regulations will be encouraged;
- i. water reuse and recycling and rainwater and stormwater harvesting, and other suitable measures have been incorporated wherever feasible to reduce demand on mains water supply;
- j. evidence that there is, or will be, sufficient wastewater infrastructure capacity to accommodate the development;
- k. at the design stage, that attention has been paid to the Design Council 'Building for Life 12' standard for well-designed homes and neighbourhoods and the Borough Council will encourage all new schemes to be assessed against the Building for Life 12 criteria, or successor documents as appropriate;
- l. the maximisation of internal space by requiring encouraging all new homes across all tenures to meet the Government's Nationally Described Space Standard (NDSS), unless other material planning considerations would mean that these space standards are not achievable.

#### **Density of development**

- 4. In seeking to make the most efficient use of land, the Council will expect proposals to optimise the density of development in the light of local factors such as:
  - a. the setting of the development;
  - b. the form and character of existing development; and
  - c. the requirement for any onsite infrastructure including amenity space.

#### **Flood Risk and Climate Change**

5. The Council's Strategic Flood Risk Assessment (SFRA) outlines potential flood risk throughout the borough. In order to ensure future growth within the borough is sustainable: the findings of the SFRA will be used to guide planned growth and future developments away from areas of high flood risk, including the coastal area. Development in any location will be expected to manage water sustainably and reduce surface water runoff using multifunctional Sustainable Drainage Systems (SuDS) where possible;
6. Shoreline Management Plans, Marine Plans and associated documents, will also serve to highlight the future needs and changes that may affect coastal communities arising from changes in climate and will be taken into account in decision making.

### **Renewable Energy**

7. The Council and its partners will support and encourage the generation of energy from renewable sources. These will be permitted unless there are unacceptable locational or other impacts that could not be outweighed by wider environmental, social, economic and other benefits. Commercial and agricultural buildings with a significant area of flat/low pitch roofs (over 250m<sup>2</sup>) should make provision for solar panels within their detailed design to maximise the use of the roof area. (See also Policy LP21).

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### **East Marine Plans Supporting Policies:**

CC1: Proposals should demonstrate that they have taken account of how they may:

- Be impacted upon by, and respond to, climate change over their lifetime
- Impact upon any climate change adaptation measures elsewhere during their lifetime
- Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.

CC2: Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal.

WIND2: Proposals for offshore wind farms (OWFs) inside Round 3 zones, including relevant supporting projects and infrastructure, should be supported.

EC3: Proposals that will help the East Marine Plan areas to contribute to offshore wind energy generation should be supported.

SOC3: Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference: a) that they will not adversely impact the terrestrial and marine character of an area b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will

minimise them c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts

## LP16 Design and Sustainable Development

### Introduction

6.3.1 Good design is a key element of sustainable development. In preparing for population growth in the borough it is imperative that proposals for new development and redevelopment are based on sound design principles. This will help ensure that what is being constructed now will be of high quality and can last far beyond the timescale of the plan. Developers will be encouraged to refer to publications and best practice on quality design in formulating development proposals.

6.3.2 The borough has a wealth of heritage in terms of its environment and history. With this wealth come challenges as the borough will need to provide extra homes and associated infrastructure without causing a detrimental impact on these qualities. Through public consultation we have learnt that communities feel that safeguarding our natural resources is crucial to ensure future generations have access to a healthy and attractive environment.

6.3.3 The choice of location has a key bearing on the long term sustainability of any proposed development. The Proposals Map and the Settlement Hierarchy Policy LP02 show a more strategic overview of acceptable locations for development. However, more specific details such as the exact location, form, layout and accessibility of the site for proposed development should also be designed to promote sustainability, for example, by situating development next to established walking, cycling or public transport routes for access to local services.

6.3.4 Grasping opportunities to enhance and expand our natural resources is vital to ensure that people and wildlife can adapt to the impacts of climate change. There is a need to find innovative solutions to maximise opportunities to help cut our carbon emissions. To aid wildlife developments should include integral bird and bat boxes within the building fabric wherever possible (for example, the Manthorpe swift box), in order to provide important new nesting and roosting opportunities. Provision of new nesting sites on new development can offer an important lifeline for these species.

6.3.5 Due to the location of the borough and the nature of many of the settlements, the use of the car remains the only viable option for many residents to travel. Changes in the road network and long term investment in public transport may be able to lessen the problem along with ensuring that new development is sensibly located with adequate facilities.

6.3. Planning in Health, an engagement protocol between local planning authorities, public health and health sector organisations in Norfolk, was adopted in March 2017. This health protocol came about in recognition of a need for greater collaboration between local planning authorities, health service organisations and public health agencies to plan for future growth and to promote health. It reflects a change in national planning policy and the need for health service organisations to deliver on the commitments within the 5 year forward view.

6.3.6 To help aid decisions, numerous studies have been undertaken to ascertain the resources we have in the borough coupled with any issues relating to sustainability and climate change and how best we can move forward in protecting our natural resources.

6.3.7 Part IV of the Environment Act (1995) and the relevant policy and technical guidance documents set out the Local Air Quality Management process. This places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives (AQOs) are likely to be achieved.

6.3.8 Two Air Quality Management Areas (AQMAs) have been declared in King's Lynn town centre and Gaywood due to exceedances of the annual mean objective for Nitrogen Dioxide. Source apportionment work has concluded the main source of the NO<sub>2</sub> is emitted from road vehicles. An Air Quality Action Plan (AQAP) has been published setting out the measures put in place in pursuit of the objectives. The borough council's Annual Status Reports show the strategies employed by the council to improve air quality and the progress that has been made.

6.3.9 The AQAP includes measures which are part of the development planning and development control process. Policy LP18 ensures that that any development is assessed in terms of its potential environmental impact, including air quality. Applications for development are screened and considered in consultation with the Environmental Quality Team in accordance with current technical guidance.

6.3.10 The NPPF requires that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of AQMAs, and the cumulative impacts from individual sites in local areas. Development should seek to identify opportunities to improve air quality or mitigate impacts that have been identified, through measures such as traffic and travel management, and green infrastructure provision and enhancement.

6.3.11 Water resources should be protected to ensure that people have access to water and that growth is sustainable. Sustainable Drainage Systems (SUDs) may include the following: drainage channels; water courses; infiltrations areas such as swales; attenuation ponds; and wetland areas. As well as providing protection from flooding these measures can also provide recreational opportunities and new habitats for wildlife.

6.3.12 The largest potential environmental risk is likely to be associated with a water company Water Recycling Centre discharge remote from the site boundary. Wastewater infrastructure requirements and/or the importance of ensuring that new development should not result in a breach of environmental legislation due to the increased polluting load from wastewater treatment works serving those developments. The policy requirement is to demonstrate that

there is, or will be, sufficient wastewater infrastructure capacity to accommodate each individual development. This would likely take the form of a Pre-Development Enquiry response from Anglian Water submitted in support of each new planning application.

6.3.13 The borough lies within one of the driest parts of the UK. Planned growth in housing and employment will significantly increase water demand. The area's large agricultural sector is also dependent on water availability in the summer. Water quality is crucial, due to the number of protected sites relying on high water quality. Anglian Water supplies water to the borough. Essex and Suffolk Water have the ability to transfer water to Essex via the Ely Ouse Transfer Scheme. Water companies have a statutory obligation to prepare and review Water Resource Management Plans (WRMP) once every 5 years setting how they will maintain a sustainable balance between water supplies and demand.

6.3.14 Anglian Water's Water Resources Management Plan to 2040 demonstrates how sufficient water for future growth will be provided and therefore water supply is not a strategic constraint to development through appropriate supply and demand measures. Consideration is given to reducing the potential demand for water before proposing supply measures.

6.3.15 Local Plans can also contribute to long term water resilience by ensuring that new development incorporates water efficiency measures including the adoption of the optional higher water efficiency standard (110 litres/per person/per day).

6.3.16 The Norfolk Strategic Planning Framework (NSPF) set out an Agreement that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

6.3.17 The NSPF also suggested that individual authorities may also wish to consider the inclusion of a specific water efficiency BREEAM standard for commercial development within their Local Plans. Improved water efficiency is not limited to measures within dwellings and commercial buildings and a collaborative approach to promote innovation in water efficiency/re-use is required working closely with water companies and site promoters/developers.

6.3.18 Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.

6.3.19 In achieving appropriate densities planning policies and decisions should support development that makes efficient use of land, taking into account: a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; b) local market conditions and viability; c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and e) the importance of securing well-designed, attractive and healthy places.

6.3.20 A Level 1 Strategic Flood Risk Assessment (SFRA) was completed for the borough in 2018 and shows the areas at risk from flooding. A Level 2 SFRA is being prepared. By using this evidence development can be steered away from areas at risk and more sustainable communities can be planned as a result.

6.3.21 Shoreline Management Plans have been prepared by the Environment Agency. These look at how the coast will be managed over the next 100 years. Options include holding the line, managed realignment or retreat. All options undergo extensive stakeholder and public consultation. Marine Plans were prepared by the MMO for the East Inshore and Offshore areas in 2014.

6.3.22 The Borough Council's Green Infrastructure Strategy is used by the Council to plan and deliver a network of high quality green spaces and other environmental features. The Green Infrastructure Strategy helps to deliver sustainable methods of design by incorporation of pathways and cycle tracks in new development, the provision of trees for urban cooling and areas which act as a refuge for wildlife in a changing climate.

6.3.23 To help meet sustainability targets renewable energy needs to be considered. There are many different types of renewable energy choices, from solar energy, wind and biomass through to energy efficient installations such as combined heat and power and ground source heating. All of these technologies and methods of construction have a role to play in meeting Government targets and were seen as positive outcomes for the borough in the Sustainability Appraisal.



**Sustainability Appraisal:**

**LP16 Design and Sustainable Development**

The changes to the policy recommended have no material impact on the scoring – it remains as having a likely positive effect.

LP16: Design and Sustainable Development																							
Policy	SA Objective:																						Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	
LP16	0	+	+	+	+	+	+	++	++	+	++	+	0	+	+	0	0	0	0	0	+16	0	Likely Positive Effect +16
Draft	0	+	+	+	+	+	+	++	++	+	++	+	0	+	+	0	0	0	0	0	+16	0	Likely Positive Effect +16
No Policy	0	+	+	+	+/-	+/-	+/-	+	++	+	++	+	0	+	+	0	0	0	0	0	+15	-3	Likely Positive Effect +12

**Appendix 1: Summary of Comments & Suggested Response:**

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
STP Estates Group (inc. West Norfolk NHS Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	<b>Object</b>	The STP estates group encourages healthy developments and would like to see a Health Impact Assessment to be required for 50 dwellings or more to ensure healthy living and wellbeing of the population. This threshold would ensure that the cumulative total of housing being built on small and medium sites would also be assessed to ensure it meets healthy living principles.		Disagree that this should be in policy. Make reference instead in supporting text to Norfolk health protocol.
Town Clerk Hunstanton Town Council	<b>Object</b>	The layout of estates of houses should facilitate connections to the surrounding areas so that public transport routes can serve the estate. The house roofs should be aligned to take maximum advantage of the sun's rays and opportunities to generate solar power.	Addition of appropriate wording to section 2 of LP16.	Disagree. The 1 <sup>st</sup> point is already covered by LP16. The 2 <sup>nd</sup> point will be covered in the new climate change policy and 3a already covers orientation.
Planning Advisor Environment Agency	<b>Object</b>	We welcome LP16 2a, however, it will be very difficult for the developers of individual developments to provide sufficient evidence to satisfy this requirement – particularly as the largest potential environmental risk is likely to be associated with a water company WRC discharge remote from the site boundary. There is no specific mention of wastewater infrastructure requirements and/or the importance of ensuring that new development does not result in a breach of environmental legislation due to the increased polluting load from wastewater treatment works serving	We suggest that there should be a more specific policy requirement: to demonstrate that there is, or will be, sufficient wastewater infrastructure capacity to accommodate each	Agree incorporate in policy and supporting text.

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		those developments.	individual development. This would likely take the form of a Pre-Development Enquiry response from Anglian Water submitted in support of each new planning application.	
Anglian Water Services Ltd	<b>Mixed</b>	<p>Reference is made to development proposals incorporating Sustainable Drainage Systems (SuDs) which is fully supported. This will help to reduce the risk of surface water and sewer flooding.</p> <p>Policy LP16 refers to residential developments delivering the optional building regulation water efficiency standard of 110 litres per person per day. We understand that the Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. Therefore we would fully support the optional water efficiency standard being applied within the Kings Lynn and West Norfolk Local Plan area.</p> <p>We note that reference is made to encouraging developers to have a greater level of water efficiency which is also supported. Anglian Water as a water company is keen to encourage increased water efficiency/re-use as part of new residential developments. To support this we are offering financial incentives for residential developers that demonstrate that water use would be 100 litres/per person/per day at the point of connection. As outlined in our current Developer charges the fixed element of zonal charge</p>	<p>It is therefore proposed that Policy LP16 be amended as follows;</p> <p>f. the promotion of water efficiency - all new housing must meet Building Regulation requirement of 110 l/h/d. Non-domestic buildings should as a minimum reach 'Good' BREEAM status;</p> <p>g. the incorporation of Sustainable Drainage Systems (SuDS);</p> <p>h. designs that exceed the present standards set by Building Regulations will be encouraged;</p> <p>i. <u>Water reuse and</u></p>	<p>Support is welcomed. Agree include new point on water reuse as suggested.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>for water supply would be waived where this can be demonstrated. We are also actively working with developers to install green water systems in new homes including rainwater/stormwater harvesting and water recycling systems.</p> <p>Further details of Anglian Water’s approach to green water proposals is available to view at: <a href="https://www.anglianwater.co.uk/developers/green-water.aspx">https://www.anglianwater.co.uk/developers/green-water.aspx</a></p>	<p><u>recycling and rainwater and stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.</u></p>	
Parish Clerk Castle Rising Parish Council	<b>Support</b>	Support requirement that new development is of good quality and contributes to sustainable development. This should require major applications to clearly set out how they respond to local/national environmental/heritage constraints and the related policies for their protection, how they have engaged with the local community, how they respond to local character and reinforce distinct identity of their location.		Support welcomed.
Mr Ian Cable	<b>Object</b>	Not all developments provide appropriate or desirable generation of energy on site. Microgeneration is not always the most efficient or appropriate. For example, solar panels are not always efficient taking into account local climatic conditions; these may be better served by larger units.	<p>Amend: 3c. reduction of on-site emissions by generation of cleaner energy where appropriate;</p> <p>Within small scale development there may be insufficient space for green space for wildlife.</p> <p>Amend: 3d. <u>within larger developments of sufficient scale</u></p>	<p>Agree include ‘<u>where appropriate</u>’ in 3c.</p> <p>Agree include ‘<u>within larger developments of sufficient scale</u>’ in 3d.</p> <p>Agree inclusion of suggested text re solar panels on commercial buildings in point 7.</p> <p>Disagree with deletion of 3j).</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;</p> <p>Commercial buildings provide ideal more appropriate opportunities for larger scale micro generation, particularly solar, without adverse impact on design/aesthetics. Add: Commercial and agricultural buildings with significant area of flat/low pitch roofs (over 250m<sup>2</sup>) should make provision for solar panels within their detailed design to maximise the use of the roof area.</p> <p>Increasing the size of homes in accordance with NDSS standards is</p>	

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			<p>not always desirable, quality of development and surroundings is in some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People should be encouraged to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate.</p> <p>Delete; j.</p>	
Lord Howard, Castle Rising Estate	<b>Support</b>	Support requirement that new development is of good quality and contributes to sustainable development. This should require major applications to clearly set out how they respond to local/national environmental/heritage constraints and the related policies for their protection, how they have engages with the local community,		Support is welcomed.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		how they respond to local character and reinforce distinct identity of their location.		
Mr D Russell	<b>Object</b>	Within small scale development there may be insufficient space for green space for wildlife.	<p>Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;</p> <p>Increasing the size of homes in accordance with NDSS standards is not always desirable, quality of development and surroundings is in some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People</p>	<p>Agree include '<u>within larger developments of sufficient scale</u>' in 3d.</p> <p>Disagree with deletion of 3 j).</p>

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			<p>should be encouraged to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate.</p> <p>Delete; j.</p>	
Mr David Miller	<b>Object</b>	Within small scale development there may be insufficient space for green space for wildlife.	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d.
Mr R Cousins	<b>Object</b>	Within small scale development there may be insufficient space for green space for wildlife.	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d. Disagree with deletion of 3j).



Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>improve the quality of life for people living in the area;</p> <p>Increasing the size of homes in accordance with NDSS standards is not always desirable, quality of development and surroundings is in some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People should be encouraged to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate.</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			Delete; j.	
Mr & Mrs J Lambert	<b>Object</b>	Within small scale development there may be insufficient space for green space for wildlife.	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d.
Mrs A Cox	<b>Object</b>	Within small scale development there may be insufficient space for green space for wildlife.	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;  Increasing the size of homes in accordance with NDSS standards is not always desirable, quality of development and surroundings is in	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d. Disagree with deletion of 3j).

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			<p>some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People should be encouraged to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate.</p> <p>Delete; j.</p>	
Dr A Jones	<b>Object</b>	Within small scale development there may be insufficient space for green space for wildlife	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d.

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			life for people living in the area;	
Mr & Mrs J Clarke	<b>Object</b>	Not all developments provide appropriate or desirable generation of energy on site. Microgeneration is not always the most efficient or appropriate. For example, solar panels are not always efficient taking into account local climatic conditions, these may be better served by larger units	<p>Amend: 3c. reduction of onsite emissions by generation of cleaner energy where appropriate; Within small scale development there may be insufficient space for green space for wildlife.</p> <p>Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;</p> <p>Commercial buildings provide ideal more appropriate opportunities for larger scale micro generation, particularly solar,</p>	<p>Agree include <u>'where appropriate'</u> in 3c.</p> <p>Agree include <u>'within larger developments of sufficient scale'</u> in 3d.</p> <p>Agree inclusion of suggested text re solar panels on commercial buildings in point 7.</p> <p>Disagree with deletion of 3j).</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>without adverse impact on design/aesthetics. Add: Commercial and agricultural buildings with significant area of flat/low pitch roofs (over 250m<sup>2</sup>) should make provision for solar panels within their detailed design to maximise the use of the roof area.</p> <p>Increasing the size of homes in accordance with NDSS standards is not always desirable, quality of development and surroundings is in some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People should be encouraged</p>	

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			to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate. Delete; j.	
Planning Advisor Environment Agency	<b>Object</b>		This should be bookmarked for removal prior to submission to the inspectorate. A document that has not been produced (Level 2 SFRA) cannot steer a document that has been produced (Local Plan).	<b>Disagree</b> – the draft Level 2 SFRA was available when the document was produced. The final Level 2 SFRA was published in July 2019.
Conservation Officer Norfolk Wildlife Trust	<b>Mixed</b>	We support the aspirations set out in 6.3.4. for enhancing and expanding our natural environment. Rebuilding the connections between our remaining areas of importance for wildlife, to increase connectivity will help wildlife populations move in adaptation to climate change, but will also play an additional role by acting as a carbon sink. We support the recognition in 6.3.11 that SUDs can provide multiple benefits for recreation and wildlife as well as flood		Support is welcomed.

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		<p>prevention, but also ask that recognition is made of the benefits to quality of life from closer proximity to wildlife that SUDs can bring to urban environments. Whilst it is noted in 6.3.13 that Anglian Water indicate there are no strategic constraints to water supply within the plan period, the Norfolk Strategic Planning Framework recognises that the County is an area of serious water stress. Increased demands for water also place additional pressure on wetland habitats and therefore we strongly support the plan's target for higher water efficiency standards for residential and commercial development.</p> <p>Policy Text We support the reference to protection and enhancement in 2.a. and recommend that specific reference is also made to biodiversity net gain.</p> <p>We support the provision of measures in 3, in particular points d, f, g and h.</p> <p>We suggest the wording in the first sentence could be made clearer, in line with the preceding paragraph, i.e. 'to promote and encourage opportunities to achieve high standards of sustainability and energy efficiency new development will be required to demonstrate its ability to include ...'.</p> <p>We strongly support 3.d., and recommend that in addition it includes reference to the integration of the development into the GI network, or creating linkages to it wherever possible.</p> <p>We also recommend that policy LP16 should include a requirement to include integral bird and bat boxes within building fabric wherever possible (for example, the Manthorpe swift box), in order to provide important new nesting and roosting opportunities. Provision of new nesting sites on new development can offer an important lifeline for these species.</p> <p>Flood Risk and Climate Change – we recommend that specific</p>		<p>Disagree with inclusion of reference to net gain at present while Environment Bill is yet to be passed. Support welcomed.</p> <p>Agree wording along these lines to be included.</p> <p>Agree wording included in 3d.</p> <p>Include reference to these measures in supporting text.</p> <p>Agree include SUDS reference in point 5 of the Policy.</p> <p>Include cross-reference to LP21.</p> <p>This will be covered by the Climate Change policy.</p>

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		<p>reference to SUDs is also made in this part of the policy text, to reflect the wording of the supporting text in 6.3.11.</p> <p>Renewable Energy – there is some overlap with policy LP21. We are pleased to note the policy support for new renewable energy sources but the wording of the second sentence is unclear regarding the circumstances where the Council would regard such development as unacceptable.</p> <p>We recommend that specific reference is given in the policy and supporting text to the government’s carbon reduction and renewable energy goals which overlap with the plan period, and that these are used to set a target for renewable energy provision from new development that the Council will seek (for example, the Merton rule), in order to meet the challenges of climate change set out in the Vision and Strategic Objectives.</p>		
Mr L Aldren		Within small scale development there may be insufficient space for green space for wildlife	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;	Agree include <u>‘where appropriate’</u> in 3c.
Historic Environment	<b>Object</b>	Object - We welcome criterion 2a but suggest changing the word	Change ‘protect’ to	<b>Agree</b> - change ‘protect’ to



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Planning Adviser, East of England Historic England		protect to conserve in line with the NPPF.	'conserve'.	'conserve' in 2a.
Parish Clerk Castle Rising Parish Council	<b>Support</b>	While we support the requirement that all new development is of a good quality and contributes to sustainable development principles, this should require all major applications to clearly set out how they respond to the local and national environmental and heritage constraints and the related policies for their protection, how they have engaged with the local community, how they respond to local character and reinforce the distinct identity of their location.		Support is welcomed.
Norfolk Coast Partnership (AONB)	<b>Object</b>	<p>A general observation of LP16 Design and Sustainable Development 'innovative use of re-used or recycled materials of local and traditional materials to decrease waste and maintain local character;' Using recycled materials such as glass and metal whilst being sustainable can also look out of place in the landscape and therefore depending on the landscape sensitivity may not be appropriate.</p> <p>In the same policy it goes on to say 'provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;' Need to try and move away from large areas of lawn as green space within development which has no biodiversity value and look to innovative green space design that will really maximise biodiversity value and provide recreational space.</p>		Comments are noted.
Parish Clerk West Winch Parish Council	<b>Object</b>	West Winch Parish Council comment – Good Design should incorporate strong sound insulation measures for protection		Comments are noted. Vehicle charging points will

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		<p>against noisy neighbours, especially in adjoining houses, to avoid future social and anti-social behaviour issues, stress and health issues. Adequate parking must be provided to accommodate residents' needs and service vehicles, such as plumbers, workmen and delivery of goods. Garages must be large enough to accommodate family cars, bicycles and outdoor items.</p> <p>6.3.2 West Winch Parish Council comment – Public consultation is good but the information needs to be presented in a much more easy to understand form and not in lengthy documents.</p> <p>6.3.5 West Winch Parish Council comment – has consideration been given to provision of suitable points to charge electric cars which may be a requirement in the future?</p> <p>6.3.16 West Winch Parish Council comment – As we have been warned in the media that water resources will be crucial over future years, the Borough Council must work closely with Anglian Water to ensure adequate supply at each stage of major development, or smaller development totals which would have accumulative equal. Essential services, such as hospitals, must and cannot be restricted.</p>		<p>be included in policies in the Plan.</p>
Gladman	<b>Object</b>	<p>Policy LP16 relates to design requirements and considerations for new development and development proposals in the Borough. In order to ensure that the policy relates fairly to the varying scale and types of development which might be proposed and subjected to its requirements, Gladman consider that the words “where relevant” should be inserted at the head of the policy to ensure that only where the nature/character of the development necessitate a response that the policy is engaged for applicants.</p> <p>Part 3J of the policy requires all new dwellings across all tenures to meet the Government’s Nationally Described Space Standard</p>		<p>Agree to the inclusion of ‘where relevant’ at poin2 of the Policy.</p> <p>Disagree subject to the completion of the supporting evidence by</p>

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		<p>(NDSS). The NDSS is an optional standard and does not form part of building regulations. PPG confirms that where local planning authorities wish to apply NDSS, sufficient evidence confirming need is necessary to support its implementation. No evidence is provided by the Council to support the application of this optional standard. Gladman request that this evidence is provided to ensure that this policy requirement is appropriately and transparently justified.</p> <p>Part 4 of the Policy sets out the Council’s approach to density. Gladman welcome the flexibility provided within the policy whereby density is to be considered on a site by site basis. The application of stringent density requirements could result in inappropriate development at a sensitive or less sustainable location, or result in a development which fails to respond to site specific conditions, constraints and opportunities.</p>		<p>housing colleagues.</p> <p>Support welcomed.</p>
Pigeon Investment Management Ltd	<b>Object</b>	<p>1.31 We support the Council’s approach to encouraging the generation of energy from renewable sources without requiring a specific percentage of development to meet specified requirements. When seen alongside the increasing requirements for insulation in new developments through building regulations this approach is a pragmatic one, as it provides the flexibility to take a holistic approach to the generation of energy at a domestic scale taking into account other material considerations.</p> <p>1.32 Whilst the general themes of Policy LP16 are considered acceptable there is concern about the impact of applying internal space standards by requiring all new homes across all tenures to meet the Government’s Nationally Described Space Standard</p>	<p>Suggested change: 1.33 So as not to have a detrimental impact upon the affordability of new homes the wording of criterion j of section 3 of Policy LP16 should be amended so that space standards are ‘encouraged’ rather than being a strict planning requirement. Should it not be</p>	<p>Agree to the suggested change to j).</p>

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		<p>(NDSS). In our experience the implication of space standards is that to deliver larger bedrooms the footprints of new homes often have to increase in size. This creates a less efficient form of construction, especially for smaller dwellings, that is subsequently reflected in sales prices. Such a requirement will inevitably affect the affordability of new homes across the Borough particularly for first time buyers in addition to affecting the viability of affordable homes.</p>	<p>possible for a development to comply with the NDSS, for reasons such as design, best use of land, etc. then Policy LP16 should include wording to allow development to be permitted.</p> <p>The wording of criterion j of section 3 of Policy LP16 should be amended as set out below:</p> <p>3. To promote and encourage opportunities to achieve high standards of sustainability and energy efficiency, should include:  'j. maximise internal Space in homes by requiring encouraging all new homes across all tenures to meet the Government's Nationally Described</p>	

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			Space Standard (NDSS), unless other material planning considerations would mean that these space standards are not achievable.'	
Persimmon Homes		<p>PHEM are concerned that the Council's evidence base for all dwellings to meet national space standards does not accord with the requirements set out within the National Planning Policy Guidance. The NPPG is clear as to the process by which a local authority seeking to adopt optional increased space standards must take into account and PHEM are concerned that these have not been met by the council.</p> <p>In respect of need the NPPG requires that 'evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.' It would appear from the evidence base put forward that the requirement for national space standards for new homes development is based on a policy aspiration of the Council rather than being on need evidence as required by the NPPG. In assessing need for National Space Standards, the Council has failed to consider the following:</p> <ul style="list-style-type: none"> <li>- no consideration of Housing market indicators that are clearly set out in national guidance which should test if the non-National Space Standards housing is fit for purpose. Such indicators could include slow or lack of sales or customer dissatisfaction surveys for</li> </ul>	Remove Criteria 'j' from the mentioned policy.	Disagree subject to the completion of the supporting evidence by housing colleagues.

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		<p>non-compliant house types.</p> <ul style="list-style-type: none"> <li>- No monitoring data of homes built to National Space Standards in the Council's Annual Monitoring Reports. Furthermore no reference is made at all to National Space Standards, let alone the need for, in the Strategic Housing Land Availability Assessment (SHMA). The SHMA is rather focused upon assessing the current and expected housing stock and its size in terms of the number of bedrooms provided in each house and how this compares to average household incomes across the district.</li> </ul> <p>Persimmon Homes have considered the key issues and evidence which may be required by the Council to establish need and the impacts of the policy which shows the following:</p> <ul style="list-style-type: none"> <li>- The most impacted homes would be 2 and 3 bed starter homes. These are popular, fast selling houses which form an important first step onto the housing ladder.</li> <li>- The impact of affordability has been completely lost by the council. The space standards can increase build costs by 20%. New build house prices for starter family homes could increase by 20%. This is illogical when one of the key objectives of policy is to boost housing supply and improve affordability.</li> <li>- People purchase homes based on their need, wants and affordability. Introduction of the space standards restricts the market and removes choice</li> <li>- Introducing the space standards would effectively remove the</li> </ul>		

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		<p>choice to buy a new build for many families, thus placing more pressure on the second and rental market to meet needs and demands and worsening overall housing market affordability, particularly when the SHMA confirms that the mean households' incomes across the district are significantly below the national average.</p> <p>- Range and choice of products on site also helps to successfully create mixed communities. Introducing space standards would severely restrict product and affordability for those at the lower end of the market.</p> <p>- There will also be direct implications for site yield and the effective use of land. Evidence shows an average 6% reduction in site capacity as a result of adopting space standards. This will inevitably reduce the output of sites and undermine allocations and housing trajectories.</p> <p>Based upon the above, PHEM are of the view that the Council's evidence base is incomplete and does not form a robust assessment of consideration of the issues.</p> <p>On the basis of the above lack of evidence to support this policy, PHEM are of the view that point j of policy LP16 should be deleted from the Local Plan. The NPPG requires that 'the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of the potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.'</p>		

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		<p>In terms of additional costings for the provision of National Space Standards, an updated viability study should be done to assess the appropriateness of imposing such a requirement. Such a document should take into account additional costs with providing National Space Standards for both affordable and market houses. PHEM experience is that the space standards can increase build costs by 20%. In addition, there will also be direct implications for site yield and the effective use of land. The lack of viability information provided is unsuitable to allow a full assessment of the implications of this policy such that the inclusion of National Space Standards is not currently justified through suitable evidence.</p> <p>A detailed breakdown of costs needs to also be provided. The NPPG also states that ‘there may be a need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.</p> <p>Consideration and implications on the timing of delivery of this policy are considered inappropriate and premature as the Council have yet to establish either the need justification or suitable and fully evidenced viability work.</p>		
Planning Manager - Local Plans Home Builders Federation	<b>Object</b>	This policy seeks to introduce the optional technical standards with regard to water efficiency and the National Described Space Standards. It will be important for the Council to ensure it has the necessary evidence to support the introduction of both these standards in line with PPG. We are concerned that the impacts of these standards are not fully considered by Council. For example,		Note the need for supporting evidence for the NDSS. The water efficiency requirement is evidenced through the NSPF work.



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		<p>some of our members consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want; our members would not sell homes below the enhanced standard size if they did not appeal to the market. We do not consider that such policies are in general required to deliver the homes people need and that local needs can be met without the introduction of the nationally described space standards.</p>		
<p>Consultations Team Natural England</p>	<p><b>Mixed</b></p>	<p>Natural England are supportive of Policy LP16 which affords protection and enhancement to the natural environment and aims to reduce environmental risks. We welcome the promotion of water efficiency as stated in point 3f.</p> <p>We suggest that the LPA reflects on the projected need and shortfall of water supply as demonstrated in the Revised Draft Water Resources Management Plan (2019) and considers if there is sufficient supply for commercial, domestic and agricultural demand.</p>	<p>We advise that the Local Plan HRA considers water supply in relation to those designated sites that are critically dependant on ground water as shown in section 3.6 of the Environment Agency's North West Norfolk abstraction licensing strategy.</p> <p>We suggest that point</p>	<p>Agree the Local Plan HRA will do this.</p> <p>Agree to suggested addition to 3g.</p>

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			<p>3g is amended as follows: 'The incorporation of multifunctional Sustainable Drainage Systems.'</p> <p>We propose that Policy LP16 is referenced in Polices LP17 and LP22.</p>	<p>Agree to include these cross-references.</p>
<p>Consultations Team Natural England</p>	<p><b>Object</b></p>	<p>Air quality - Natural England advises that proposals likely to generate additional emissions as a result of increased traffic generation should be considered in the Plan and the SA/HRA, particularly nitrogen and acid emissions and deposition which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) should be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required and taking into consideration any cumulative /in-combination effects.</p> <p>We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species. The results of the</p>		<p>This will be covered in the SA and HRA of the Plan.</p>

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		assessment should inform updates to the HRA and SA, both of which will need to identify appropriate mitigation to address any predicted adverse impacts to the natural environment, including statutorily designated sites. Delivery of mitigation measures will need to be secured through the appropriate Plan policies.		