



GREAT YARMOUTH
BOROUGH COUNCIL

Cabinet

Date: Monday, 29 January 2024

Time: 15:00

Venue: Supper Room

Address: Town Hall, Hall Plain, Great Yarmouth, NR30 2QF

AGENDA

Open to Public and Press

1 **APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

2 **DECLARATIONS OF INTEREST**

You have a Disclosable Pecuniary Interest in a matter to be discussed if it relates to something on your Register of Interests form. You must declare the interest and leave the room while the matter is dealt with.

You have a Personal Interest in a matter to be discussed if it affects

- your well being or financial position
- that of your family or close friends
- that of a club or society in which you have a management role
- that of another public body of which you are a member to a greater extent than others in your ward.

You must declare a personal interest but can speak and vote on the matter.

Whenever you declare an interest you must say why the interest arises, so that it can be included in the minutes.

3 ITEMS OF URGENT BUSINESS

To consider any items of Urgent Business.

4 MINUTES - 04.12.2023

4 - 21

To confirm the minutes of the meeting held on the 4 December 2023.

5 MINUTES - 14.12.2023

22 - 25

To confirm the minutes of the meeting held on the 14 December 2023.

6 CONTROL CENTRE AND COMMUNITY ALARM SERVICES
EMERGENCY CONTRACT DECISION

26 - 43

7 23-106 - PERFORMANCE MANAGEMENT (CAPABILITY) POLICY
AND PROCESS

44 - 62

Report attached.

8 23-198 - GREAT YARMOUTH BOROUGH-WIDE DESIGN CODE
SUPPLEMENTARY PLANNING DOCUMENT - FORMAL
ADOPTION OF THE ABOVE SPD

63 - 325

Report attached.

9 23-204 -ADOPTION OF LOCAL DEVELOPMENT SCHEME

**326 -
589**

Report attached.

10 22-264 - THE STAR HOTEL

**590 -
594**

Report attached.

- 11 **23-069 - HRA SERVICE CHARGE REVIEW UPDATE** 595 -
616
- Report attached.
- 12 **23-205 - UPDATE - REGULATION OF INVESTIGATORY** 617 -
POWERS ACT 2000 629
- Report attached.
- 13 **23-175 - FEES AND CHARGES 2024-25** 630 -
666
- Report attached.
- 14 **EXCLUSION OF PUBLIC**
- In the event of the Committee wishing to exclude the public from the meeting, the following resolution will be moved:-
- "That under Section 100(A)(4) of the Local Government Act 1972, the public be excluded from the meeting for the following item of business on the grounds that it involved the likely disclosure of exempt information as defined in paragraph 1 of Part I of Schedule 12(A) of the said Act."
- 15 **CONFIDENTIAL - 23-213 - SPEND OF ALLOCATED ROUGH**
SLEEPING INITIATIVE (RSI) FUNDING
- Details
- 16 **CONFIDENTIAL MINUTES**
- Details



Cabinet

Minutes

Monday, 04 December 2023 at 14:00

Councillor Smith (Leader & Portfolio Holder for Finance, Governance and Major Projects) (in the Chair), Councillors Bensly (Portfolio Holder for Tourism, Culture & Coastal), Candon (Portfolio Holder for Economic Development & Growth), Plant (Deputy Leader & Portfolio Holder for Operational Property and Asset Management) Flaxman-Taylor (Portfolio holder for Housing, Health and communities) & Wells (Portfolio Holder for Environment & Sustainability, Waste and Licensing).

Also in attendance

Ms S Oxtoby (Chief Executive Officer); Ms C Whatling (Monitoring Officer), Ms K Sly (Executive Director - Finance), Mrs P Boyce (Executive Director, People), Mrs N Turner (Head of Housing Assets), Mrs K Price (Head of Health Integration and Communities), Miss M Lee (Head of Customer Services), Mr J Wedon (Information Governance Lead), Mrs S Wintle (Corporate Services Manager), Ms L Snow (Finance Manager) Mr M Walker (Skills Manager) and Mr D Zimmerling (IT Support)

Councillors Wainwright, Williamson and Capewell attended as observers to the meeting.

APOLOGIES FOR ABSENCE

There were no apologies for absence received at the meeting.

DECLARATIONS OF INTEREST

There were no declarations of interest declared at the meeting.

ITEMS OF URGENT BUSINESS

There were no items of urgent business to be discussed at the meeting.

MINUTES

The minutes of the meeting held on the 13 November 2023 were confirmed.

23-185 - QUARTER 2 PERFORMANCE REPORT 2023-24

Cabinet Members received and considered the Information Governance Lead's report.

The Leader presented and advised that the report provided an update on performance for the second quarter of 2023/24 (July to September), where progress is assessed against Targets which are set at the start of the financial year together with an update on the position of key projects that are linked to the corporate priorities from 'The Plan 2020-2025'.

The project highlight report detailed in Appendix 1 of the report provided a summary of the project, milestones and achievements, alongside open issues, mitigation and a financial summary.

It was reported that each report had a current status, which could be green, amber or red. Out of the 13 projects, 11 had a current green status defined as no problems or minor issues and 2 have an amber status, defined as having problems which have been identified but with a contingency plan in place.

The performance measures, detailed in Appendix 2, gave a comprehensive overview of how the authority as a whole was performing and covered most Council functions

The Leader advised that In total there were 44 targeted and 22 monitored measures reported in the second quarter performance report. The monitored measures were reported for contextual information and this data is important information for the Council as the actions of the Council may make improvements however there is not sufficient control over the outcome to set a target.

Of the 44 targeted measures 28 were reported as Green whereby performance had been met or exceeded target, 11 were Amber whereby performance is below target but within tolerance and 5 were red whereby performance is below target and tolerance.

The red measures were reported as follows :

- **PR06:** Contact centre telephone calls: Percentage of Contact Centre calls answered as a % of all calls offered (Quarterly Cumulative)
- **PR13(a):** Internal Audit recommendations - Number of priority 1 Internal Audit recommendations outstanding
- **PR13(b):** Internal Audit recommendations - Number of priority 2 Internal Audit recommendations outstanding

- **EN06:** Contamination rate in dry recycling
- **HN04:** Average cost of a Void repair

The Leader reported that each of the red measures included a commentary contained within the report explaining the reasons behind the performance and the actions being taken to bring performance back on target.

The Portfolio Holder for Economic Development and Growth, Councillor Daniel Candon commented that it was reassuring to see a number of Key Projects being highlighted as green and further commented that he was pleased to see the Leader and Deputy Leader together with Cllr Kay-Billing from Norfolk County Council commencing the first point of piling for the Operations and Maintenance campus.

The Portfolio Holder for Environment and Sustainability, Licensing and Waster, Councillor Wells reassured Cabinet Members that work was ongoing to improve the performance measure for recycling and advised that the recycling trial roll out had commenced and Members would be kept informed of it's progress.

Cabinet **RESOLVED** to :

(1) Agree that all key performance indicators continue to be monitored during the next quarter.

(2) Agree that all key projects will continue to be monitored over the next quarter with the aim of maintaining a green status and where possible attaining a green status for those key projects which are currently amber.

23-186 - UKSPF PEOPLE SKILLS COMMISSIONING STRATEGY

Cabinet Members received and considered the Executive Director's report.

The Portfolio Holder for Economic Development and Growth, Councillor Candon presented the report to Members and advised that the report set out recommendations for the open, competitive commissioning of three interventions under the Council's approved UK Shared Prosperity Fund (UKSPF) 'People & Skills' investment priority in 2024/25.

The approved Great Yarmouth UKSPF Investment Plan makes provision for three interventions under the 'People & Skills' Investment Priority in 2024/25, reflecting local needs. Summaries of the funding, guidance and associated outputs/outcomes are presented in the annex.

- E33: Employment Support for Economically Inactive Residents (£150,000 allocated)
- E35: Supporting Residents Furthest from the Labour Market (£80,000 allocated)
- E37: Tailored Support for Residents in Employment (£50,000 allocated)

To ensure the delivery of activity from April 2024, a commissioning strategy must be established. Key stakeholders, including the County Council and GY Skills Taskforce members have been consulted.

The Great Yarmouth Skills Taskforce – comprising local skills and employability stakeholders – led the prioritisation of interventions under the ‘People & Skills’ Investment Priority. Their key aims include:

1. maximising social inclusion and the accessibility of local opportunities
2. ensure that the jobs that employers need to fill are aligned to pathways for residents to access them

Other bodies, such as the Town Board (which was augmented to meet the requirements of a UKSPF ‘Local Partnership Group’) and Great Yarmouth Health and Wellbeing Partnership – successor to the Great Yarmouth Locality Board and includes representation from elected members, council officers, colleges, hospitals, the police and voluntary sector – also had the opportunity to contribute.

The UKSPF-funded Skills Manager is in the process of drafting a new Skills & Employability Strategy and Action Plan for consideration. They, and the Skills Taskforce, have an ongoing role in the strategic mapping of progression pathways based upon current and emerging skills support provision in the Borough.

This report sets out recommendations for the open, competitive commissioning of three interventions under the UKSPF ‘People & Skills’ investment priority in 2024/25. It is recommended that management of the competitive commissioning process along the lines outlined is delegated to officers, with the evaluation of proposals and awarding of contracts undertaken by a panel comprising: GYBC (director level) and Skills Taskforce members from NCC, LSIP, DWP and resident representation.

These interventions directly support some key aims and objectives contained within the forthcoming Strategic Plan, meaning they impact localised challenges in factors such as economic inactivity, health and wellbeing, social mobility, low earnings and education attainment. Collectively, the interventions promote:

- Raising aspirations for initial employment and higher-skilled career destinations.
- Individualised support for people to overcome barriers to both employment and skills development
- Developing core employability skills as identified by employers
- Attaining basic skills to access advanced levels of in-house training and education
- Provision of more accessible skills programmes in terms of both place and times

- Widening employer facilitation for relevant and quality work placements
- Developing a 'learning culture' within both communities and workplaces

Furthermore, the interventions are designed to provide a legacy with factors such as recording data for future intervention appraisal, opening 'new' employer touchpoints, shared resource for employability skills development, and new learning sites.

The Deputy Leader and Portfolio Holder for Operational Property and Assets commented that he was pleased to see the plan coming to Great Yarmouth and noted the full cohort of people that would be able to benefit from the interventions.

Cabinet **RESOLVED** to :-

(1) Note and approve the commissioning strategy set out in the report

(2) Delegate to Officers the management of the open, competitive commissioning process described.

23-182 - SAFEGUARDING POLICY 2023 - UPDATE

Cabinet received and considered the Prevention and Early Hub Manager's report.

The Leader presented and advised that the report being considered provided members with an update to the Council's Safeguarding Policy 2020 and reporting procedures.

The review of the Policy which takes place every 3 years ensures that the Council complies with current and up to date legislation. The refreshed Safeguarding Policy subsumes the Child Protection Policy of March 2017 and the Modern Slavery Policy of March 2017.

Great Yarmouth Borough Council's safeguarding work is led by a network of trained Designated Safeguarding Officers (DSO) who are in turn supported by officers acting as Safeguarding Champions across the council's services. DSOs meet monthly to discuss individual safeguarding cases when needed, provide support to colleagues with safeguarding queries, track trends and ensure national guidance updates to policies and procedures inform local policy.

In October 2022, the DSOs identified the need to improve the way the council tracked safeguarding concerns and support staff and members to report safeguarding. As a result in October 2022, the Council introduced a new internal reporting form for staff and members. This helps the Council track and evidence its safeguarding interventions and onward interaction with and referral to the Norfolk Safeguarding Children Partnership (NSCP) and Norfolk Safeguarding Adults Board (NSAB).

Safeguarding data is reviewed and monitored by the Designated Safeguarding Officers at their monthly meeting and allows the Council to identify safeguarding trends, develop training requirements and prepare communication updates.

All member briefings were provided in July and September 2023 to present the Safeguarding reporting procedure and the data collection process.

The updated Safeguarding Policy has been restructured to outline responsibilities and legislation within the main body and has the inclusion of 3 appendices. These appendices are provided to give practical advice on recognising safeguarding topics, recognising abuse and the process required to follow reporting procedures for all staff and elected members.

Cabinet **RESOLVED** to :

(1) Agree the Safeguarding Policy 2023 as amended and updated.

(2) Delegate authority to the Executive Director – People and Prevention & Early Help Manager to make minor and/or consequential amendments to the Policy for the purpose of keeping it up to date, clarifying its content or interpretation, correcting any errors or omissions, updating it in accordance with changes in legislation, and/or caselaw, or with changes in the management structure.

23-183 - DOMESTIC ABUSE POLICY - UPDATE

Cabinet received and considered the Head of Organisational Development's report.

The Leader presented and advised that the report provided members with an update to the Council's Domestic Abuse Policies; a new 'Domestic Abuse Policy' and a 'Domestic Abuse Policy for Staff and Members'.

The review of these Policies takes place every 3 years and ensures the Council complies with current and up to date legislation. The review at this time supports the Council's ambition to become accredited as an organisation with the national Domestic Abuse Housing Alliance (DAHA).

Purpose of the proposed Policies :-

Domestic Abuse Policy 2023 – the first policy supports people, in the borough and beyond. It sets out the Council's commitment to highlighting the issue, its processes for supporting victims and perpetrators of domestic abuse, and how it will work with relevant external partner agencies to eradicate Domestic Abuse.

Domestic Abuse Policy for Staff and Members 2023 - has been developed which aims to demonstrate our commitment to employees and members to

provide information about where and how to access support and information. This new policy strengthens the Council's commitment to those who come into contact with Domestic Abuse. The policy subsumes and replaces the previous Domestic Abuse Workplace Policy 2017.

The policies have been thoroughly reviewed and updated by HR and has been through the consultation process with ELT, UNISON and JCWG. Feedback has been positive and only minor amendments were made to the draft policy. UNISON and the JCWG, independently provided very similar feedback.

With funding support from Norfolk County Council, the Council has committed to become a Domestic Abuse Housing Alliance (DAHA) accredited organisation in 2023/24. These policies forms part of the evidence base for that accreditation.

Subject to members approval, the policies will be published on the Council's website and made available to staff and member via the Council's intranet site (The Loop). Domestic Abuse training for the roles identified in both policies will be provided as and when required as part of the DAHA accreditation preparations.

The portfolio Holder for Economic Development and Growth, Councillor Candon commented that he was very happy to support the recommendations within the report and he was please to see that the policy also covered and included domestic abuse at the workplace.

Cabinet **RESOLVED** to :

(a) Agrees the Domestic Abuse Policy 2023.

(b) Agrees the Domestic Abuse - Staff & Members Policy 2023 as amended and updated.

(c) Delegated authority to the Executive Director – People and Head of Organisational Development to make minor and/or consequential amendments to the Policies for the purpose of keeping it up to date, clarifying its content or interpretation, correcting any errors or omissions, updating it in accordance with changes in legislation, and/or caselaw, and/or learning from serious case reviews and domestic homicide reviews.

23-161 - AGILE WORKING REVIEW

Cabinet received and considered the Head of Organisational Development's report.

The Leader advised that the report presented a review of agile working and makes recommendations on further ways to modernise the Council's working practices.

The Leader reported that Agile working provides greater flexibility particularly

in relation to the time and location employees can work, subject to the requirements of the service and individual jobs. It has been successfully embedded into the Council over the last two years. The key principals of agile working are still relevant and include:

- Agile and flexible working is based on the business needs
- A commitment to investment in technology
- Staff are supported, motivated, engaged and feel part of the organisation
- To support and increase opportunities on recruitment and retention
- Productivity, outputs and performance are increased
- Improved resilience and ability to flexibly deliver our services
- Reducing the running costs of the Council through making best use of our assets
- Reducing our environmental footprint

The impending changes to the flexible working legislation, working time regulations and this review, gives an opportunity for the Council to continue to modernise it's working practices and ways of working that will benefit the Council, its staff and communities.

The report summarises and takes into consideration all of the feedback, the evidence of performance, the latest research and the office rationalisation.

Councillor Williamson asked for clarification as to whether 4 day working weeks would be offered to staff if requested as it was detailed within the report. The Chief Executive Officer advised that this was not something that was being promoted but by having the policy in place does allow for such requests to come in and be considered, but these would be very much be based upon the business need. Councillor Wells commented that it was clear that this matter would be dealt with on a case by case basis.

Councillor Bensly commented on the environmental impact and the importance of this continuing to be addressed.

Councillor Wainwright commented on the need for hunt groups to be set up in departments to ensure calls are being answered and also raised the importance of departments ensuring that emails are being responded to.

Cabinet **RESOLVED** to :

Note the review of agile working, its success and support the next steps to continue to modernise our ways of working.

23-162 - GREAT YARMOUTH'S USE OF TEMPORARY ACCOMODATION

Cabinet received and considered the Head of Strategic Housing's report.

The Portfolio Holder for Housing, Health and Communities, Councillor Flaxman-Taylor, presented the report and advised that the limited availability of affordable

rented accommodation in both the private and social sectors, has resulted in the Council not always being able to prevent homelessness or, where a household is found to be statutorily homeless, secure suitable settled accommodation in a reasonable amount of time.

The situation has led to the need to accommodate high numbers of households in temporary accommodation, which includes the use of costly and unsuitable bed and breakfast accommodation.

To reduce the need for temporary accommodation it is proposed to facilitate access to affordable private rented accommodation through the creation of a social lettings scheme and to provide more social housing by accelerating the Council's affordable housing delivery programme.

In recent years the private rental market in the Borough Council area has seen an increase of rents. These are unaffordable to many households on low incomes, including households in receipt of benefits. The private rented sector has an important role to play in the provision of housing, therefore, to make it more accessible to households on low incomes, it is proposed to pursue the creation of a social lettings scheme. The social lettings scheme would be operated by a Council owned company and offer affordable, quality private rented accommodation to households at risk of homelessness. Moreover, such a scheme would also assist with supporting regeneration and renewal in the Borough as it provides further opportunities to bring empty homes back into use.

Although the Council continues to deliver and enable additional social housing, new provision combined with the impact of the Right to Buy and lower levels of turnover of existing stock is failing to meet need. Therefore, it is proposed that the Council's affordable housing delivery programme is accelerated to meet strategic housing need, which includes homeless prevention. The proposed acquisition programme is to comprise of two funding routes: Retained Right to Buy Receipts and Homes England grant; each route will be match funded by borrowing on rental income within the Housing Revenue Account (HRA). The proposed programme will seek to deliver up to 60 acquisitions of open market dwellings over the period 2023-26 and will supplement new build delivery over this period. All housing will be held in the HRA.

As an interim measure, to ensure that the cost of temporary accommodation is minimised, it is proposed that the Council enter into lease agreements for suitable properties to be used as temporary accommodation. It will be ensured that all proposed lease agreements are subject to robust business cases and have adequate break clauses.

Subject to Members approval of the above proposals, work will begin in earnest to facilitate access to private rented accommodation and an increase in the provision of social housing.

With respect to the creation of a social lettings scheme, to enable the use of appropriate tenancies and the ability to charge sub-market rents, the delivery of the proposed scheme requires a suitable Council owned vehicle. A fully costed proposal will be presented to Cabinet in early 2024.

The acceleration of the affordable housing delivery programme is based on the Council acquiring open market housing to meet need. Homes England grant will be subject to successful indicative bids for affordable housing.

Individual business cases for leased short term temporary accommodation will consider the financial viability and dwelling mix. Officers under existing delegations will ensure leasing opportunities have adequate break clauses in order to provide the Council's temporary accommodation offer on a short-term basis.

Councillor Flaxman-Taylor advised that the report sets out proposals to facilitate access to quality, affordable housing for private and social rent which aim to prevent homelessness and reduce the number of households being placed in temporary accommodation. In addition, as an interim measure whilst additional settled accommodation is being delivered, to negate the use of bed and breakfast accommodation as a form of temporary accommodation, it recognises the need to provide more cost-effective and suitable temporary accommodation through leasing arrangements and the use of HRA dwellings.

The Leader commented on the need for this report in view of the continued use of Bed and Breakfasts being unsustainable.

The Portfolio Holder for Operational Property and Assets, Councillor Plant agreed with the Leader and commented that there was a clear need for this matter be looked.

Councillor Wainwright commented that he welcomed the report and highlighted the current figures of housing applications the Council had. He asked with regard to the length of time temporary accommodation could be deemed as temporary, although this could not be quantified as each case was treated individually. It was also reported that the Council were looking to accelerate the use of settled properties rather than temporary accommodation.

Cabinet **RESOLVED** to :

1. Agrees to pursue the creation of a social lettings scheme, including an in-principle capital budget of £2million of General Fund borrowing, this being subject to Council approval (see recommendation (d) below).
2. Agrees to the proposed acceleration of the Council's affordable housing delivery programme, and for submission of grant funding bids to Homes England
3. Agrees that as an interim measure, to negate the use of bed and breakfast, up to 50 homes are to be leased to provide temporary accommodation. In line with the Council's Property Acquisitions and Disposals Policy, the decision to acquire and / or lease accommodation is delegated to the Executive Director – People, the Executive Director of Property and Housing Assets, and the Section 151 Officer.

And **RECOMMEND TO COUNCIL:**

1. That a £2 million in principle capital budget is set aside to fund a social lettings scheme.

23-052 - COUNCIL TAX DISCOUNTS 2024-25

Cabinet received and considered the Head of Customer Services report.

The Leader presented and advised that this report sought approval of the levels of council tax discount that shall apply for 2024/25 as set out in the paper.

For the financial year 2024/25 it is proposed that there is one change to these discounts regarding Empty Property Premiums, as the Levelling Up and Regeneration Bill has now been given Royal Assent.

Currently Empty Property Premiums can be up to 100% for those properties that have been empty between 2 years and less than five years, 200% for those properties empty for between 5 years and less than 10 years and 300% for properties that have been empty for more than 10 years.

The enactment of the Levelling Up and Regeneration Bill now gives Councils the discretion to apply an Empty Property Premium of 100% after one year of the property being empty, instead of the current two years. The Premiums for the 200% and 300% will remain as currently of 5 years and 10 years respectively (see Appendix 4 for the increased revenue that could be generated by the change).

The Council has had discretion to be able to add a premium charge to properties that have been empty since 2013. It was introduced as part of the Government's range of measures to bring empty homes into use. Empty homes are wasted assets and are often a blight on the local community, harming the local amenity of neighbouring properties. Therefore, putting empty homes more quickly back into productive use will increase housing supply, details of the proposed change to empty property premium charges can be found at table 1 (3.2) within the report.

It was advised that Appendix 1 provided a summary analysis of the impact of the introduction of the empty property premiums on the number of empty properties within the time periods which demonstrates an overall reduction in the number of empty properties defined as 'long term'.

Full Details of the recommended Council Tax Discounts to be applied in 2024/25 can be found from pages 138 to 139 of the agenda pack.

Cabinet **RESOLVED** to **recommend to Council** :

1) The approval of the council tax discounts as shown in the table in Section 4.1 which will apply for 2024/25

2) The approval of the Second Homes Premium of 100% for Class B properties (that we currently charge 100% council tax) to commence from 1 April 2025

23-051 - COUNCIL TAX SUPPORT SCHEME 2024-25

Cabinet received and considered the Head of Customer Services report.

The Leader presented and advised that this report sought Cabinet endorsement to ask Council for approval of the recommended Council Tax Support Scheme 2024/25.

There have been minimal changes to the scheme since its first introduction and financial assistance for those classed as working age customers has been limited to a maximum of 91.5% of their council tax liability. Those customers of pension age remain unaffected by the Council Tax Support Scheme and continue to receive the same financial level of assistance as they did under the Council Tax Benefit Scheme.

Serious consideration has been given to the 2024/25 Council Tax Support Scheme in recognition that the Council, like many other Local Authorities, is facing considerable challenges with budgets and have a lack of clarity around future government funding settlements.

Unlike council tax benefit where the expenditure was fully subsidised, funding for Council Tax Support schemes was less than council tax benefit and has since been lost within the Revenue Support Grant and core funding which has continued to reduce and be re-purposed over recent years. Taking the financial challenges into account, this year the council has considered options to reduce the overall cost of the Council Tax Support scheme.

A public consultation on the 5 options ran for a 12 week period and has now closed. As well as being published on the Council's website, every household in receipt of council tax support at that time was contacted directly by letter advising them that the council was considering a change to the Council Tax Support Scheme for 2024/25 and that a change could affect the level of financial support they would receive. They were invited to take part in the formal consultation.

The options under consideration ranged from continuing with the current scheme, to various stepped reductions in the maximum award from 87.5% to 75% of the Council Tax Liability.

A total number of 143 responded to the consultation, 76% of the responders were in receipt of Council Tax Support.

As part of the consultation process, these options were considered by Members of Scrutiny at the 24th October 2023 committee. - The Committee recognised that the Council is facing ongoing financial challenges in years ahead, however, there was concern that any change to the existing scheme would affect vulnerable families who were already struggling with the cost of living. There were some assurances that should a change go ahead a hardship fund would be available to protect the most vulnerable, however, there was a preference to retain the current scheme.

The impact of any change has been considered by undertaking an Equality Impact Assessment on the recommended option, and can be found at Appendix A.

In recognition of the Council's financial position, it is recommended that a change to the existing scheme is made to reduce the overall cost to the Council. However, it is also important that a hardship fund would be available to help mitigate the impact of the change on vulnerable households.

It is proposed that the maximum award of Council Tax Support for working age is amended to 80% of the Council Tax Liability, however, Members may wish to consider the other options consulted on. **Appendix B** provides the estimated cost options of each scheme considered.

This change would affect all working age recipients with no protections in place for certain groups except for Care Leavers. The Equality Impact Assessment recognises the impact of this change on individuals and households, however, also concludes that working age households on low income eligible for Council Tax Support are likely to be similarly impacted to those with additional disability financial support to help with day to day living.

It is recommended a hardship scheme is in place in the sum of £200,000 to help support individuals and households who may be in more financial difficulty. The scheme would only be eligible to working age recipients of Council Tax Support with an eligibility criteria prioritising the most vulnerable groups.

Councillor Wainwright asked if consideration could be given to the establishment of a Working Group similar to the one that had been created to look at grants, to look at the Discretionary Council Tax Support Fund and to monitor the impact of the proposed changes.

Cabinet **RESOLVED** to recommend approval to Council :

- (1) To amend the Council Tax Support Scheme 2024/25 to reduce the maximum council tax support to 80% of the Council Tax liability
- (2) To protect Care Leavers from this change
- (3) To make provision for a hardship scheme of £200,000

(4) To delegate the ability for the Head of Customer Services & Revenue & Benefits Service Manager to make any smaller adjustments to the scheme that may be required to align to the wider welfare benefits system for 2024/25

(5) To establish a Working Group in relation to the Discretionary Council Tax Support Fund and to monitor the impact of the proposed changes.

23-053 - COUNCIL TAX BASE 2024-25

Cabinet received and considered the Head of Customer Service's report.

The Leader presented and advised that this report asked the Committee to endorse the calculation of the 2024/25 tax base totalling 30,581 This is the total number of domestic properties in the Borough using band D as the average property band which is to be approved by Council.

The Council Tax base is a technical calculation that must be formally set each year. It is the first stage of the Council Tax setting process that will be finalised once the budgets have been agreed.

Details of the Tax Base Calculation can be found within the report and for the purposes of this report the Local Council Tax Support Scheme has been estimated for maximum award of 80% for working age claimants.

The normal non-collection rate used is 1.75%. However, for this year the non-collection rate has been estimated as higher than normal due to the national cost of living issues at 2%.

Cabinet **RESOLVED** and **recommend to Council** :

1) The calculation of the 2024/25 tax base totalling 30,581 which represents an increase of 730 in the tax base, and the estimated tax bases for the Borough and for each parish, as shown in Appendix A

23-155 - SAVINGS 2024/25- MEDIUM TERM FINANCIAL STRATEGY

Cabinet received and considered the Executive Director, Resources report.

The Leader reported that Cabinet had received the updated Medium Term Financial strategy for the period 2024 to 2027 in November 2023 which included the latest forecast financial position.

Prior to this, work had already commenced on the 2024/25 and the identification of savings and additional income against the target of £2million to be delivered for the 2024/25 budget to mitigate the forecast funding gap.

The Leader advised that this report set out the next steps for the Council's plan to present a balanced budget for approval in February 2024 for the 2024/25 financial year.

The updated Medium Term Financial Strategy (MTFS) for the period 2024/25 to 2026/27 was presented to Cabinet in November for recommendation to Council in December.

The MTFS included updated financial projections for the period of the strategy which at the time forecast a gap of £2.5 million in 2024/25 increasing to in excess of £4million by 2026/27. These are ahead of the detailed service budgets being produced for which work is underway.

The MTFS included a savings target of £2m for 2024/25 allowing for £500k to be taken from reserves. It should be noted that this is ahead of the production of the detailed service budget and the announcement of the finance settlement for 2024/25, however the delivery of the savings and additional income is an essential element of the business strategy work to deliver a balanced budget for the coming financial year.

As part of the budget process savings and additional income proposals have been submitted by officers for consideration by Members and this report now presents an update to Members on the work to date and makes recommendations on savings and income proposals to be taken forward as part of the budget for 2024/25.

To date there have been various officer and member working groups including joint party working groups to discuss the budget and savings proposals that are being presented for approval.

Further discussions are still being held and options for closing the budget gap and these will be finalised over the coming months and presented within the budget reports for approval in February 2024.

This report provides the outcome of the discussions to date and the implementation plan for the savings proposals to allow where applicable some of the proposals to be progressed for implementation to achieve forecast savings and deliver income as anticipated in the 2024/25 financial year. Savings proposals have been grouped into 3 groups and are detailed at page 4 and 5 of 5 within the supplementary agenda pack

This report is recommending approval for £1.489 million (in addition to those currently approved and in progress) savings and income which will have a significant impact on reducing the forecast budget gap for 2024/25 and future years. As the details of the service budgets are produced over the coming weeks and once the finance settlement has been announced this work will inform the final budget to be presented for approval in January/February 2024.

Early approval of the savings as detailed in the report supports the financial planning process for producing a balanced budget for 2024/25.

Councillor Wells asked with regard to the Gorleston putting green and the figure listed, it was however confirmed that this was a saving amount and not an income amount.

Councillor Wainwright asked with regard to the withdrawal of funding for the lifeguard provision and asked whether GYTABIA had been approached to see

if they could fund this provision, the Leader confirmed that he had requested a meeting with GYTABIA to discuss this matter.

Cabinet **RESOLVED** to **recommend to Council** :

1. The savings and additional income proposals as outlined at Appendix A for implementation for the 2024/25 budget.

22-161 - CONTROL CENTRE AND COMMUNITY ALARM SERVICES EMERGENCY CONTRACT DECISION

Cabinet received and considered the Head of Health Integrations and Communities report.

The Portfolio Holder for Housing, Health and Communities, Councillor Flaxman-Taylor presented and advised that the Council currently operates an in-house Alarm Receiving Centre (ARC) which takes calls from sheltered housing resident alarms, dispersed community alarms, Be at Home alarms and provides the Councils' Out of Hours call response service. After charges to residents and tenants for paid-for alarm services, the cost of the ARC is around £200,000 in subsidies from the Councils' budgets.

With the national switching of phonelines from analogue to digital, which is already underway and is due for completion by 2025, the current software and hardware used by the in-house service would require significant investment to maintain this service going forwards. In addition, there is a current service risk associated with the digitalisation of phone lines which requires prompt action to resolve, and additional issues related to this are emerging weekly along with difficulties caused by recent IT changes.

This, combined with significant risk to the service from a lack of resilience in the staffing capacity and limited ability to draw on shift cover from our existing partnership arrangement means we have a significant risk that this service could become undeliverable at short notice, which would put the lives of those relying on the alarm monitoring service at risk.

Were the Council to retain the in-house ARC, there would be a significant increased cost which cannot be met by the available budget. Therefore, retaining the service as-is, is considered not feasible on detailed options appraisals.

For the purposes of value for money, it is proposed that the ARC is not separated by its service delivery for sheltered housing tenants and community alarm customers (it is not possible to divide the service use as the staffing levels remain the same) which may result in a more favourable financial cost to the HRA for long term as the more lucrative customer base is included in the package.

Given the increase in immediate risks identified which officers believe are

likely to impact on loss of life (should the Council's service fail to respond to an alarm call owing to either lack of staff cover or analogue to digital drop-out) this report proposes a direct award to the existing partner organisation which provides staff cover to the in-house staff given the timescale for a full procurement. Were this process to go to a full tender process, there is a significant risk that during this timescale the Council could be in a position where at short notice it becomes unable to deliver this service in its current form.

In order to achieve this, officers recommend that article (42.10.5) of the Councils' Constitution be invoked to deem this an Operational Emergency as there is a possible risk to life from a service failure given the circumstances listed below with regards to unforeseen service resilience in both staffing and external availability of cover. These factors, along with the digital rollout increasing risk, are not within the Councils' control.

It is therefore vital for the Council that it takes these decisions imminently based on the risk to alarm users, the potential financial impact and associated legal risks. With these risks in place it is our obligation to ensure we do all we can to mitigate these to avoid risking lives.

Councillor Flaxman-Taylor passed on her thanks to Officers for the work that had gone into the report in such a short space of time.

Councillor Capewell sought clarification as to whether the vacant posts were remaining to be advertised and this was confirmed.

Councillor Williamson and Wainwright expressed their concern that this matter had not been discussed with the Scrutiny Committee nor the Shadow Leader.

The Leader asked for this report to be taken to the Scrutiny Committee for consideration prior to Cabinet making a decision and therefore proposed that the item be deferred. The Leader advised that he would call a Cabinet meeting on the 14th December at 5pm for Cabinet to discuss the item and receive any comments back from Scrutiny Committee..

Cabinet **RESOLVED** to :

Refer the item to the Scrutiny Committee for consideration before being brought back to a Cabinet meeting on Thursday 14 December 2023.

EXCLUSION OF PUBLIC

There were no Members of public in attendance at the meeting.

23-109 - CONFIDENTIAL - EQUINOX ENTERPRISES LIMITED AND EQUINOX PROPERTY HOLDINGS LIMITED SHAREHOLDER'S UPDATE

(Confidential Minute on this Item)

The meeting ended at: TBC



GREAT YARMOUTH BOROUGH COUNCIL

Cabinet

Minutes

Thursday, 14 December 2023 at 17:00

Councillor Smith (Leader & Portfolio Holder for Finance, Governance and Major Projects) (in the Chair), Councillors Plant (Deputy Leader & Portfolio Holder for Operational Property and Asset Management); Flaxman - Taylor (Portfolio Holder for Housing Health and Communities); Bensly (Portfolio Holder for Tourism, Culture & Coastal); Candon (Portfolio Holder for Economic Development & Growth); & Wells (Portfolio Holder for Environment & Sustainability, Waste and Licensing).

Also in attendance:-

Ms S Oxtoby (Chief Executive Officer); Ms C Whatling (Monitoring Officer), Mrs P Boyce (Executive Director - People), Ms K Sly (Executive Director - Finance), Mrs N Turner (Head of Housing Assets), Mrs K Price (Head of Health Integration and Communities) Mrs S Wintle (Corporate Services Manager).

Councillors Wainwright, Jeal, Martin and Capewell attended as observers to the meeting.

01 APOLOGIES FOR ABSENCE

There were no apologies for absence received at the meeting.

02 DECLARATIONS OF INTEREST

There were no declarations of interest declared at the meeting.

03 ITEMS OF URGENT BUSINESS

The Leader advised that there were no items of urgent business to be discussed.

04 22-161 - CONTROL CENTRE AND COMMUNITY ALARM SERVICES EMERGENCY CONTRACT DECISION

The Cabinet received and considered the Head of Health Integration and Communities and Head of Housing assets report.

The report advised that the the Council currently operated an in-house Alarm Receiving Centre (ARC) which takes calls from sheltered housing resident alarms, dispersed community alarms and provides the Councils' Out of Hours call response service. After charges to residents and tenants for paid-for alarm services, the cost of the ARC is around £200,000 in subsidies from the Councils' budgets.

With the national switching of phonelines from analogue to digital, which is already underway and is due for completion by 2025, the current software and hardware used by the in-house service would require significant investment to maintain this service going forwards.

In addition, there is a current service risk associated with the digitalisation of phone lines which requires prompt action to resolve, and additional issues related to this are emerging weekly along with difficulties caused by recent IT changes.

This, combined with significant risk to the service from a lack of resilience in the staffing capacity and limited ability to draw on shift cover from our existing partnership arrangement means we have a significant risk that this service could become undeliverable at short notice, which would put the lives of those relying on the alarm monitoring service at risk.

Cabinet received a presentation from the Head of Health Integration and Communities and Head of Housing assets which looked into more detail around the current situation and recommended proposals.

The Leader reminded Members that he had referred this particular item to the Scrutiny committee for consideration before a decision was taken by the Cabinet, he advised this meeting had taken place on Tuesday 12 December and therefore, asked in the absence of the Chair of Scrutiny Committee, the Vice Chair to provide any comments or feedback from the Scrutiny Committee with regard to the report.

Councillor Freeman, Vice-Chair of Scrutiny Committee advised Cabinet that Scrutiny considered the report and a vote was taken by the Committee to ask Cabinet to consider the following :-

1. Taking time to develop a full Business Case, undertaking a procurement process and any relevant consultations during the proposed 14 month consultation period.
2. Addressing any immediate risk by undertaking a recruitment campaign and increasing the number of shifts given to relief staff.

The Leader asked if the presentation presented to Cabinet had been shown to the Scrutiny Committee, and it was advised that these had not been shown due to being circulated late to the meeting.

Councillor Candon raised some concern with regard to the request for time to develop a full Business Case when Members were being advised the service was at risk of being undeliverable.

Councillor Wells, sought clarification from the Monitoring Officer that following comments and concern that had been raised from other Members that the emergency provision being applied remained relevant to this matter, the Monitoring Officer confirmed that this provision could be applied to this matter.

Councillor Wells sought assurance that the system currently in use was able to fulfil the service currently being provided, The Head of Health Integration and Communities advised that everything was being done to fulfil the service requirements however noted that these were short term measures.

Councillor Wells commented further on the recruitment of staff to vacant posts which had been raised by the Scrutiny Committee and it was advised that it was a 2 month process when a new member of staff commenced due to the level of training required.

Councillor Plant commented on the proposals and recognised that Officers had highlighted that the level of risk was too high to allow time to undertake a full procurement process but noted that a full business case would be developed. Councillor Plant commented on the need to recognise that this was a system being supplied to the residents within the Borough that was at risk of failing them, therefore he accepted that the proposed solution presented by Officers was the quickest solution at this time.

Councillor Bensly asked with regard to the sickness absence levels and why these had been so high, it was advised that this could not be discussed in detail but it was confirmed that the days shown had accounted for 3 separate staff members.

Councillor Bensly asked whether the service had ever been at full capacity, it was advised that the service had more recently struggled to retain trained staff. It was advised that the risk of the service failing had been escalated due to the potential risk of not being able to cover incoming calls.

Councillor Martin raised concern with regard to recruitment as she had been informed that no roles had been advertised to assist with recruitment since March 2023, she further advised that she had been made aware that Relief Operators were not being allocated additional shifts.

The Leader reminded Members that the proposals would see the cutting of this service, but that these proposals were necessary to provide a more resilient service.

Councillor Wainwright made reference to a business case that he believed had been seen by the Council's Executive Leadership Team (ELT), The Chief Executive Officer advised that an options appraisal had been reported to ELT in March as part of the original contract awarding for Careline365.

Councillor Wainwright asked with regard to a letter that had been sent to all sheltered housing tenants and raised his disappointment that Members had not been informed nor sent a copy of this letter. The Head of Housing Assets advised that the Council has a duty as landlord to communicate such proposals with its tenants, but apologised that Members had not been informed or sent a copy of the letter.

Councillor Jeal questioned why this matter had not been addressed sooner considering the risk that had been advised, it was confirmed that this matter had been a risk identified on the Corporate Risk Register but that the risk status had gone up and down, it was advised that what this showed was the risk had been monitored however it was now felt that the risk had escalated to the point that needed to be

looked into.

Cabinet **RESOLVED** to :-

(1) Agree to Officers commencing with the next steps as detailed within the Head of Health, Integration and Communities and Head of Housing Assets presentation.

(2) Support the direct award of a contract to the current standby service provider, CareLine365, which provides current shift cover in order to minimise risk to residents under existing officer delegations to the Executive Director – People and Section 151 Officer in association with the Monitoring Officer as an Operational Emergency under article (42.10.5) given the possible risk to life.

(3) Note the procurement of a 24/7 out of hours telephone call answering service needed to deliver the emergency out of hours call handling (currently provided by the alarm monitoring service as an additional service) will need to be expedited as a result of the above.

The meeting ended at: TBC

Recommendations from Scrutiny



Meeting Title	Scrutiny Committee		
Democratic Support	Corporate Services	Meeting Chair	Cllr Williamson

Date of meeting	Minute Item No	Agenda Item	Recommendations
04.01.24	3.	Minutes	To be confirmed at the next meeting
04.01.24	4.	Control Centre and Community Alarm Services Emergency Contract Decision	<p>Cabinet are asked to consider the following recommendations and comments from the Scrutiny Committee :-</p> <ul style="list-style-type: none"> (1) The Committee recognise that there is a need for change and for the analogue system to be upgraded as soon as possible. (2) Scrutiny commented on the need for the council to evidence best practice when communicating changes to its services, which could impact staff and job roles. Scrutiny requested that communication be given in person and not via email and this to be the case for all services across the Council in the future. (3) That in future information regarding any significant changes to a Council service of a similar nature be reported to the Leader, Shadow Leader, responsible Cabinet Member and Chair of Scrutiny Committee. (4) Scrutiny requested that Officers discuss further, the requirements for this service being delivered by East Suffolk Council and investigate if their own in-house service has been improved and is now TSA accredited.

CABINET



URN: URN 22-161

Report Title : Control Centre and Community Alarm Services Emergency
Contract Decision

Report to: ELT – 22 November 2023
Cabinet – 4 December 2023
Scrutiny - 12 December 2023
Cabinet - 14 December 2023

Responsible Cabinet Member: Cllr Flaxman-Taylor, Cabinet Portfolio Holder for Housing, Health & Wellbeing

Responsible Director / Officer : Kate Price, Head of Health Integration and Communities &
Nicola Turner, Head of Housing Assets

Is this a Key decision ? No

Date added to Forward Plan of Key Decisions if a Key Decision: N/a

EXECUTIVE SUMMARY

The Council currently operates an in-house Alarm Receiving Centre (ARC) which takes calls from sheltered housing resident alarms, dispersed community alarms and provides the Councils' Out of Hours call response service. After charges to residents and tenants for paid-for alarm services, the cost of the ARC is around £200,000 in subsidies from the Councils' budgets.

With the national switching of phonelines from analogue to digital, which is already underway and is due for completion by 2025, the current software and hardware used by the in-house service would require significant investment to maintain this service going forwards. In addition, there is a current service risk associated with the digitalisation of phone lines which requires prompt action to resolve, and additional issues related to this are emerging weekly along with difficulties caused by recent IT changes.

This, combined with significant risk to the service from a lack of resilience in the staffing capacity and limited ability to draw on shift cover from our existing partnership arrangement means we have a significant risk that this service could become undeliverable at short notice, which would put the lives of those relying on the alarm monitoring service at risk.

RECOMMENDATIONS:

That Cabinet:

(a) Supports the direct award of a contract to the current standby service provider, CareLine365, which provides current shift cover in order to minimise risk to residents under existing officer delegations to the Executive Director – People and Section 151 Officer in association with the Monitoring Officer as an Operational Emergency under article (42.10.5) given the possible risk to life.

(b) Notes the procurement of a 24/7 out of hours telephone call answering service needed to deliver the emergency out of hours call handling (currently provided by the alarm monitoring service as an additional service) will need to be expedited as a result of the above.

1. INTRODUCTION

1.1 The Council currently operates a non-statutory Alarm Receiving Centre (ARC) which provides a monitoring service for sheltered housing tenants, community alarms and associated assistive technology, as well as providing this equipment for rental to residents for a fee from its Wherry Way office. This service is provided from a small in-house team providing one staff member who monitors incoming calls operating in 24/7 shifts. Gaps in shift cover and staff breaks are provided by an external contractor under agreement (CareLine365 – part of the Appello Group based in Norwich).

1.2 Alarm connections currently provided are listed below:

- Sheltered housing alarms – 945 individual properties and 105 communal/fire connections;

- Community alarms – 915 connections/users (Supporting 973 individuals, 55 out of borough);
- Be-at-Home alarms – 70 temporary units for people being discharged from hospital.

1.3 In-house staffing resource is made-up of 13 posts:

- 1 x Community Alarms Officer – Grade 5 – 37hrs
- 1 x Business Support Officer – Grade 4 – 15hrs
- 7 x Control Centre Operators – Grade 3 plus enhancements – various shift patterns covering 24/7 operations
- 4 x Relief Control Centre Operators – Grade 3 – various shifts, two posts vacant

1.4 The service, while receiving an income from its alarm monitoring and rental services to residents, currently runs at a significant financial loss to the council.

The summarised expenditure cost and income based on previous and current yearly budgets is shown below:

Staffing costs (inc. on costs)	£366,431
Non-staffing costs (inc equipment)	£174,948
Total direct costs	£541,379
Income (alarm connections, rental, OOH charge inc. VAT)	-£335,834
Deficit	£205,545

1.5 Almost all Community Alarms need upgrading to digital as the national rollout (from analogue to digital telephony) continues. The cost of upgrading to digital is approximately £200 per unit, with a lifespan of approximately 5 years. The weekly charge to rent a Community Alarm unit without monitoring is £1.90 (exc. VAT). The new digital alarms additionally incur a cost of £48 per unit for an annual SIM data connection. Therefore, it takes approximately 4 years of the 5-year lifespan to pay for the initial investment before there is a small surplus if fee increases were not made to pass the costs on to customers.

1.6 To maintain the service as-is and make ready for the new digital specification would require the Council to spend c£130,000 investment to replace current analogue alarms to digital alarms and also absorb the £48 per unit per year i.e. circa. £44,000 per annum for SIM data card costs to support connectivity, as well as increased costs for a digital monitoring platform of around £12,000 per annum.

1.7 The TSA (TEC Services Association) is the industry and advisory body for Technology Enabled Care (TEC) in the UK. The TSA provide an independent, not-for-profit organisation which provide consultancy and advice services to organisations providing TEC services. Alarm Receiving Centres (ARCs) can get TSA accreditation for meeting their industry standards. GYBC does not hold TSA accreditation and, within existing structures and staffing levels, it would not be able to reach the standards required to gain accreditation.

1.8 In order for the Council to be able to reach the required TSA accreditation standards as a minimum, the cost to the Council would increase the deficit to around £461,000 including

recharges - an increase of £95,000 on current staffing costs as this requires more than one call handler to be on-shift at any time with supervision, as well as increased costs of digital equipment and software.

- 1.9 There is no scope to increase the fees in order to recoup an additional income of this magnitude as the service is currently one of the more expensive on the market, despite not being TSA accredited or fully digital, and the market is very competitive with commercial providers with larger operations able to offer much lower rates to residents. An increase in costs would likely result in a decline in clients, increasing the service deficit.

Example comparison costs are shown below:

Operator	Set Up Cost	Monthly cost for basic alarm and monitoring
GYBC	£54 - £65	£17.58
CareLine 365	£0	£11.99 - £15.99 (free £15 voucher)
Telecare24	£45	£9.00 - 13.99 (free key safe)
n-able (Norse)	£0	£15.99

- 1.10 The digital upgrade also has an impact on the sheltered housing provision. The current hardware for the alarm system was designed for operation on analogue phonelines. The move to digital telephone exchanges (happening now) and change to all phonelines being digital by December 2025 is a serious operational risk as the system is less reliable when operating over digital lines as calls can drop out and not reach the ARC. An upgrade is required to ensure security of connection as the digital change increases pace and completed in December 2025.
- 1.11 The above has resulted in the need to look at the options in the market for an alternative to ensure provision for residents, sheltered tenants and vulnerable community alarm customers, which meets their current and future needs in an affordable way for which officers have engaged the services of the TSA to assist us with market analysis and advice.

1. PROPOSAL

- 2.1 Were the Council to retain the in-house ARC, there would be a significant increased cost which cannot be met by the available budget. Therefore, retaining the service as-is, is considered not feasible on detailed options appraisals.
- 2.2 For the purposes of value for money, it is proposed that the ARC is not separated by its service delivery for sheltered housing tenants and community alarm customers (it is not possible to divide the service use as the staffing levels remain the same) which may result in a more favourable financial cost to the HRA for long term as the more lucrative customer base is included in the package.
- 2.3 There are a number of key requirements identified by officers in the development of these proposals which are key to include as minimum requirements for the benefit of residents and the futureproofing of the service in terms of growing health needs and emerging technology:

- Any new service should be able to TUPE existing staff.
 - Provider should be TSA accredited and maintain that accreditation.
 - Any new monitoring service should have open protocols which allow equipment from any supplier to be monitored rather than restricted to only equipment supplied by the monitoring company.
 - Provider will take on the responsibility to upgrade dispersed equipment to digital.
 - Provider to have technology in place (digital bridge) to minimize the risk of call dropouts during the national analogue to digital switch-over and post switch over.
 - Provider to work in partnership on key current projects enabling hospital discharge (Be at Home).
- 2.4 Ideally a provider would also have an option for the Council to be a referral partner with a payment made for identifying new customers however this needs testing with the new external provider.
- 2.5 A full tender process would be expected to result in a new service being mobilised and operational in January 2025. This would present 14 months of running with the current service risks.
- 2.6 Given the increase in immediate risks identified which officers believe are likely to impact on loss of life (should the Council's service fail to respond to an alarm call owing to either lack of staff cover or analogue to digital drop-out) this report proposes a direct award to the existing partner organisation which provides staff cover to the in-house staff given the timescale for a full procurement. Were this process to go to a full tender process, there is a significant risk that during this timescale the Council could be in a position where at short notice it becomes unable to deliver this service in its current form.
- 2.7 In order to achieve this, officers recommend that article (42.10.5) of the Councils' Constitution be invoked to deem this an Operational Emergency as there is a possible risk to life from a service failure given the circumstances listed below with regards to unforeseen service resilience in both staffing and external availability of cover. These factors, along with the digital rollout increasing risk, are not within the Councils' control.
- 2.8 With staff aware that this is being explored for some time and that it is likely that an external provider will result, many have expressed an interest in leaving given the level of uncertainty. With recruitment so challenging at the moment, it is likely with their skills and experience that control centre staff will be able to source suitable employment in a very short space of time.
- 2.9 Equally, with a shortened procurement via a direct award, existing staff will be able to transfer to the new local service provider thereby reducing the risk of staff leaving.
- 2.10 Currently the service has such low staffing levels that it is not possible to cover all current shifts, and the in-house service has an agreement in place with CareLine365 (also known as LifeLine who are part of the national Appello group). CareLine365 has an agreement to cover shifts as needed and as able, as well as breaks for the call handlers as they work solo, from their office in Norwich.
- 2.11 CareLine365 maintains staff trained in the Councils' current analogue monitoring platform, Jontek, in order to be able to provide the cover the Council needs as it is not part of their standard service delivery. They have noted that they would be unlikely to be able to cover the whole 24/7 service delivery should there be a service failure due to lack of Council staff. They

will also have a reduced ability to cover shifts should there be any illnesses or covid outbreaks over the winter period in their own staff which means we do not have a guaranteed fallback should the service be unable to cover shifts.

- 2.12 As this service is potentially lifesaving, it has been established that this risk and the potential outcome for tenants and community alarm service users if their alarms were unanswered, are such that under the constitution we can enact a waiver as an operational emergency and move to a direct award instead of completing a full procurement process.
- 2.13 Should the Council be found to have known about these risks and not acted in a timely manner and a service failure result in a preventable death then the council would likely face a significant investigation and adverse ramifications – legal, reputational, and potentially financial.
- 2.14 With the ARC being externalised from the Council, this also requires the current Out of Hours offer to be reviewed (which is already in progress) and an alternative provider for this 24/7 call handling sought. As the removal of the ability to take 24/7 telephone calls, some of which are statutory, may also result in a service failure (given lack of staff cover), it is additionally recommended that a new 24/7 out of hours services for the Council is sought by way of a Request to Quote as a waiver of full procurement based on the timescales and level of risk. As this risk is under £250,000 that this can be approved by the Executive Directors under guidance from the Monitoring Officer, this element is for note as required due to unforeseen circumstances.
- 2.15 It is proposed that Cabinet approve this recommendation to a direct award under a waiver under the identified provision in the Councils' Constitution based on the significant level of risk to clients and the financial risk to the Council for alarm monitoring and in due course.

3. NEXT STEPS

- 3.1 To continue with the consultancy already in train with the TSA to undertake due diligence of the Councils' existing provider, CareLine365 to determine that this external provider can meet the minimum requirements outlined in the above section.
- 3.2 Utilising this external and industry leading support, officers will negotiate an initial offer from CareLine365 that demonstrates it is able to deliver good market value and best consideration for the client base including the ongoing Sheltered Housing alarm monitoring scheme contract. Officers will ensure the proposal is in the best interest of the Council with robust monitoring and ability to enforce high performance standards which safeguards residents' lives.
- 3.3 Using the proposal, the Council will consult with staff and the trade union on the TUPE proposal and ensure this represents a fair offer to staff and ensure there is time to work with CareLine365 on areas of improvement where required.
- 3.4 The Council will agree a communications plan with Sheltered and Community Alarm users to ensure they are aware of the coming changes. For sheltered tenants, there is no requirement to consult on a change as it is operationally minimal, however there is a risk that should they wish to test or enquire about the move they use their alarm to call the Council (this is a regular occurrence for repairs and general enquiries) and if this happens it may prevent

legitimate alarm calls from coming into the ARC due to busy lines so it is in the councils' best interests to communicate the changes clearly to tenants as early as possible.

- 3.5 Community alarm customers will need to opt-in to the move to an external provider as it is not covered under their existing contract. Therefore, all customers will need to be written to regarding the changes and actively opt-in to being transferred.
- 3.6 Officers will work with CareLine365 to prepare the Jontek data for a transfer to their digital Evo platform.
- 3.7 Out of Hours service provision will need to be in place by the move over so contracts for this will be given priority as well to ensure no risk to the service with the necessary legal advice sought.
- 3.8 Expected timescales to minimise the risks set out in this report are:
 - December 2023 – January 2024: Engage with TSA for consultancy support; work with CareLine365 to establish a formal proposal; get the data ready to migrate; communicate with customers to inform of changes including GDPR opt-in.
 - February 2024: Consult with staff on TUPE proposals.
 - March 2024: Agree and sign contracts; mobilize data transfers.
 - April 2024 – new service begins with no gap in service provision for residents.

4. FINANCIAL IMPLICATIONS

- 4.1 The implication of not undertaking an out-sourcing model, even outside the current risks, is that the HRA and GF will carry the increased, and as yet not fully known total capital costs of the digital switch-over. This is a minimum of £235,000 in the short term on interim technology and dispersed alarm upgrades.
- 4.2 Potential annual savings of £200,000 per year to the council cannot be realised against the existing costs of running an internal alarm receiving centre as per 1.4 costs summary.
- 4.3 To meet TSA accreditation and the change to digital software and hardware (not including the initial capital costs) would increase budgets for the service by approximately £300,000 on top of the current £200,000 deficit, increasing the budget of the service which would need to be met by the General Fund.
- 4.4 There will be costs to a procurement exercise with TSA consultancy of c.£20,000.
- 4.5 To not act and be found negligent if an alarm call is not responded to would pose an unknown but significant potential financial risk to the Council.

5. RISK IMPLICATIONS

- 5.1 The risk of allowing the service to continue as it stands for a longer period of time is potentially risking the lives of residents should the service fail for lack of staff to answer calls or ensure the operation running of the service at short notice.
- 5.2 Missing alarm calls could lead to the council being held responsible for negligence in the case of a tenant or resident's death should the alarm not connect due to the digital upgrade of telephone exchanges and phone lines which is a known risk.

- 5.3 Delaying decisions in this report longer term, outside the immediate risk, will mean the council still has to upgrade the sheltered housing alarm equipment in the interim to adapt the system to full digital functionality (circa £104,000). This may or may not be compatible with the successful contractor and therefore presents a financial waste.
- 5.4 As this digital switch-over is happening UK-wide, there is a risk that the limited market of quality providers may be engaged with bidding for other contracts and may not be as receptive to a smaller quantity of connections when there are more lucrative contracts on offer.
- 5.5 Ongoing issues with our own IT services are already posing issues with our VPN regularly causing periods of non-coverage when external call monitoring is used which would not be required with a direct service, reducing risk significantly.
- 5.6 To not act based on the known risk to life risks in the immediate term would put the Council at risk of being found negligent should there be no service available when an alarm is activated.

6. LEGAL IMPLICATIONS

- 6.1 This process to procure with a waiver will require legal and HR advice and procurement support in relation to staffing and availability of choice in a limited digital alarm market.
- 6.2 There would be a legal implication if we were unable to provide at short notice a service for which we are contracted by the almost 2,000 customers to provide to them as a paid service.
- 6.3 The legal basis within the constitution for requesting this approval to act as an operational emergency is:

42.10.5 Operational emergency

(a) Subject to any legal limitations, the Head of Paid Service, the s151 Officer or an Executive Director, having consulted the Monitoring Officer (or their nominated deputy), may approve an exemption to any part of these Contract Standing Orders that is necessary because of an Operational Emergency creating immediate risk to life, persons or property within the Borough or causing serious disruption to Council services (including any emergency or disruption under the Civil Contingencies Act 2004). An Operational Emergency is a situation that is the result of an unforeseen event over which the Council has no control. This procedure must not be used when a requirement has become late due to lack of planning on the part of the Council.

(b) Full documentation must be completed regardless of the urgency of the requirement and a full and transparent audit trail must be made throughout the procurement process. Where the value of the Contract is over £250,000 a report supporting the use of this power must be taken to Cabinet at the first available opportunity.

- 6.4 While full costs of the contract are not yet known until the TSA supported negotiations begins, it is prudent to consider the life of the contract could be, but may not be, over £250,000 and therefore Cabinet is requested to approve this action.

- 6.5 The Call Monitoring associated contract will be under this threshold therefore appropriate senior officers will be able to fulfil this approval, but it is asked that Cabinet note the required additional action.

7. CONCLUSION

- 7.1 It is vital for the Council that it takes these decisions imminently based on the risk to alarm users, the potential financial impact and associated legal risks. With these risks in place it is our obligation to ensure we do all we can to mitigate these to avoid risking lives.

BACKGROUND PAPERS

- Previous ELT Reports dated March 2023 and updated appraisal of market options for services in-scope.

Consultations	Comment
Monitoring Officer Consultation:	As part of ELT
Section 151 Officer Consultation:	As part of ELT
Existing Council Policies:	N/A
Equality Issues/EQIA assessment:	Yes – on file



Scrutiny Committee

Minutes

Thursday, 04 January 2024 at 18:30

PRESENT:-

Councillor Williamson (in the Chair); Councillors Freeman, Grant, Galer, Hammond, Jeal, Mogford, Murray-Smith, Robinson-Payne, Thompson, Wainwright, & Waters-Bunn.

Councillor Capewell attended as a substitute for Councillor Cordiner-Achenbach.

Councillors Bensly, Candon, Plant, Smith, Flaxman-Taylor & Wells attended as observers.

Ms S Oxtoby (Chief Executive Officer), Mrs P Boyce (Strategic Director - People), Ms K Sly (Strategic Director - Resources), Ms N Turner (Head of Housing Assets), Mrs K Price (Head of Health, Integration & Communities), Ms C Whatling (Monitoring Officer), Mrs S Wintle (Corporate Services Manager), Mr T Williams (Communications Manager), Mr D Zimmerling (IT Support) & Mrs C Webb (Democratic Services Officer).

Mr J Dunning (Unison).

01 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor Cordiner-Achenbach.

Councillor Capewell attended as a substitute for Councillor Cordiner-Achenbach.

02 DECLARATIONS OF INTEREST

There were no declarations of interest given at the meeting.

03 MINUTES

The minutes of the meeting held on 12 December 2023 were noted.

Councillor Capewell reported that he did not feel that the minutes reflected the meeting as, in his view, many of the questions asked at the meeting were unanswered. The Monitoring Officer reported that the Democratic Services Officer had been off sick between Christmas and the New Year and hence the minutes had been circulated late to the Committee.

04 22-161 - CONTROL CENTRE AND COMMUNITY ALARM SERVICES EMERGENCY CONTRACT DECISION V3

The Committee received and considered the updated report from the Head of Health Integration & Communities.

Scrutiny Committee invoked a Call-in on the 18 December 2023 in line with Article 18 of the Council's Constitution, to consider the decision taken by Cabinet on 14 December 2023.

The decision related to the direct award of the Alarm Receiving Centre (ARC) and 24/7 Out of Hours Call Response Service, due to a combination of significant elevated risks by way of operational emergency powers under the Constitution; Article 42.10.5. The report sets out the process and procedure leading up to the Call-in. The report provided Members with further information pertaining to the need for an urgent decision and use of Article 42.10.5.

The report also provided additional information, as recommended by Scrutiny Committee, to retain a fully complaint service in-house and a full business case to facilitate a direct award should the decision to outsource stand following the meeting this evening.

Members were asked to review the content of the documentation supplied as part of the Scrutiny Committee report:-

- Full Business Case – Appendix 1.
- Rationale for the use of emergency powers – Appendix A.
- Draft specification for an outsourced monitoring service - Appendix B.
- Confidential Annex – Due diligence and CareLine365 financials.

The Monitoring Officer reminded the Committee that they had three options:-

(i) To do nothing

(ii) To refer the matter back to Cabinet with suggested amendments; or

(iii) Refer the matter to Full Council.

Councillor Grant asked for clarification as to whether Scrutiny could overturn a Cabinet decision. The Chair confirmed that Scrutiny could not overturn a Council decision.

The Chair informed Scrutiny that the Council did not have a dedicated Scrutiny Officer and that this role was shared between the Corporate Services Manager & Democratic Services Officer. The Monitoring Officer reported that a Scrutiny Officer was not a mandatory role for the Council to provide.

The Chair reported that he did not intend for an officer to present the presentation slide by slide but that he intended to ask Members if they had any questions relating to each slide. Any additions to the original report would be highlighted, the Business Case followed by the Procurement Documentation would then be gone through on a page by page basis.

Councillor Wainwright was concerned that if Careline365 took over the service provision that they would cease the Be at Home Service which was essential to prevent bed blocking at the JPUH. The Head of Service confirmed that the requirement for the retention of the Be at Home Service was a requirement stipulated by the JPUH. Councillor Waters-Bunn asked if the NHS contributes to the Be at Home Service.

Councillor Thompson asked if there was a marketing plan in place to increase the take up of community alarm customers to increase revenue which in turn would make it more profitable for the Council to keep in-house.

Councillor Capewell asked for an update in regard to staffing levels. The Corporate Services Manager to forward him the relevant email following the meeting.

Councillor Capewell reiterated the perceived failure of the Council to not to start to prepare for the digital switch-over in 2025 which they had known about since 2015 and asked for a response. The Head of Service reported the timeline of works to upgrade the analogue Jontec system to digital to date and reiterated that the Council could not afford to undertake all the required works at once. The Head of Service reported that approximately 450 of the commercial customers had been upgraded but this excluded any sheltered housing residents.

Councillor Jeal asked how the new digital service would function during a power cut in the borough. The Head of Service reported that the Sheltered Housing system would have battery back-up provision.

Councillor Jeal asked if there were any statistics available for failed receipts. The Head of Service explained that a failed receipt meant that a call did not connect and not that it was not picked up and that we were aware of no cases of this nature.

Councillor Wainwright asked why the figures relating to the risk relating to failed receipts in September & November 2023 was so high. The Head of Service reported that these figures related to calls whose source was unknown but these were not missed calls and the reason behind them was unknown.

The Strategic Director - People reported that a NCC upgrade did not agree with Jontec and there was a considerable failure in August & September 2023 which the Council dealt with. The risk to the service then moved to staffing shifts, staff sickness and Careline365 were brought in to cover shifts.

Councillor Wainwright reported that NCC should have foreseen any consequences resulting from this major upgrade and an "elderly system fail" was not acceptable. Councillor Capewell reported that upgrades should form part of change management which should be fit for purpose with back up plans and this critical service should be well within the remit of NCC.

Councillor Robinson-Payne asked why the December statistics were missing from the report. She informed the Committee that she had a friend who worked for the Ambulance Service who had informed her that they had been called out everyday by residents who had fallen to pick them up off the floor as Careline365 had failed them which she found quite disturbing.

Councillor Capewell reported that the lack of resilience in the service was all in the Council's making as they had not actively advertised any posts since March 2023. The Strategic Director - People clarified that adverts had also been posted in May and July 2023 without success. The Chair reported that the jobs advertised did not offer any job security as they were 1 year fixed term contracts. The Head of Service clarified that the last two posts which were advertised were full-time, substantive posts.

Councillor Capewell asked if the Council had researched the reasons behind the high levels of staff absence and whether they were treated in accordance with the Council's Sickness Absence Policy. The Head of Service confirmed that staff were dealt with in line with the Council's Sickness Absence Policy.

Councillor Capewell asked whether the responsible officers had utilised the resources of relief staff correctly before employing the services of Careline365. The Head of Service reported that 1 relief staff member had been on leave over the Christmas period between 19 December 2023 and 1 January 2024 and the other officer had phoned in sick on 27 & 28 December 2023, so as the Council was unable to use them and as was no resilience in the relief operators, Careline365 stepped in to cover the shifts.

Councillor Wainwright asked why the Council was not looking at Mediquip as a potential service provider and whether it had considered partnering with East Suffolk Council (ESC). The Head of Service reported that ESC was not TSA accredited and their system was 2/3 years behind Jontec. ESC was also funded by Suffolk public health funding. The Council was asking for a direct award, via an urgent decision by Cabinet, and did not intend to talk to anyone else.

The Head of Service reiterated the necessity for the Council to appoint a TSA accredited provider and the ESPO framework had been used to identify the emerging provider in July 2022 which was Careline365 which was a Norwich based company.

The Monitoring Officer assured the Committee that although emergency powers were being enacted, the Council had safeguards built into the process regardless of the urgency.

The Strategic Director - People reminded the Committee that it was a cumulative

effect of staff sickness, unfilled posts and a system failure in the Summer 2023, which had resulted in the decision being taken by Senior Officers that this posed a risk to life and the resulting report this evening asking for Cabinet to act under emergency powers and agree a direct award to Careline365.

Councillor Murray-Smith informed the Committee that he had looked at the Trustpilot reviews for Careline365 as part of his decision-making process. Councillor Capewell reported that the use of emergency powers to save money as opposed to going through a proper procurement process was not justification enough in his view. The Monitoring Officer reported that this was incorrect, emergency powers had been invoked as this situation posed a risk to life as set out in the appendix report.

Councillor Capewell reported that he did not think that the use of emergency powers rather than going through a normal procurement process to save money was justification enough for going down this route. The Monitoring Officer reported that this was not the case, emergency powers had only been invoked as the service posed a risk to life and required a swift resolution.

The Chair informed the Committee that this situation had rumbled on for more than a year and that all Members were unaware until the Cabinet agenda had been publicised on CMIS. Councillor Wainwright reported that Councillor Flaxman-Taylor, Cabinet Portfolio Holder, for Housing, Health & Communities was aware but had told no-one. The Leader of the Cabinet confirmed that this was correct. The Chair requested that this did not happen in the future.

The Head of Service reported that she would not give a verbal report pertaining to the non-confidential Business Case and that any new information which had arisen since the last report was contained in the confidential appendix.

The Chief Executive Officer informed the committee that the ARC service was subsidised by our tenants to the amount of £366k and was it reasonable that all of our tenants subsidised the service to that level. The Chair stated that this was a question for Cabinet and not Scrutiny. The CEO suggested that Scrutiny should scrutinise VFM.

Councillor Waters-Bunn asked if our Jontec system had ever been TSA accredited, and if so, what were the associated costs. The Head of Service responded that we had never achieved TSA accreditation.

The Head of Service reported that any contract would be fully compliant and be GDPR compliant. All the information which we currently held on each service user in Jontec would be replicated and updated on the new system and would be made available to Careline365 in a secure portal. We wanted the level of understanding of our SH tenants needs to be made available to Careline365 and for them to share information with Tenancy Services Officers especially when SH tenants are returning home from hospital.

Councillor Grant asked for clarification in regard to our tenants protected characteristics. The Head of Service reported that individual personal support plans would be reviewed frequently and the Control Centre would be informed

of specific vulnerabilities in regard to the ARC service.

Councillor Hammond asked for an update on the staffing position. The Head of Service reported that TUPE would not kick in for the staff until there was an offer on the table from a service provider. Then when staff were TUPE'd across, the Council would ensure that all terms and conditions were met. There would be no offer of redundancy as all staff would be offered a role with the new service provider.

The Head of Service informed the Committee that the Careline365 management team had met with 5 out of the 8 staff at Wherry Way yesterday, and the remaining staff would meet with them this week. It was imperative that both sides kept talking to each other and the Head of Service and Line Manager would be available to answer questions at any time.

Councillor Mogford asked how many staff were employed by Careline365. The Head of Service reported that there were 15 staff covering day-time shifts and 6 staff covering night-time shifts and they handled 72,000 connections per annum compared to our 2,000. The new staff would be offered office based working, hybrid working or remote working where all equipment would be provided.

Councillor Murray-Smith pointed out that as the staff would be joining a larger company there would be the opportunity for development training and promotion. The Head of Service reported that Careline365 were keen to promote from within and were passionate in regard to staff development. Careline365 had their own training team on the ARC system and would look at all reasonable adjustments for the redeployment of the staff including their choice of day or night shift.

Councillor Capewell asked how many calls each of the 15 call handlers would be expected to answer in a shift compared to our existing staff and whether they would be micro-managed to achieve the expected KPI's which was not good for staff wellness or morale.

Councillor Grant asked whether any officers had concerns or were aware of any complaints in regard to Careline365 that he, as a Member, should be made aware of. The Head of Service reported that she had no concerns and was not aware of any complaints.

Councillor Freeman reminded the Committee that it was imperative that they concentrated on the safety of the service for the residents which depended on it.

Councillor Waters-Bunn asked for clarification in regard to the the out-of-hours service provision. The Head of Service reported that this was a different service and would be tendered independently using a framework and soft market testing. Councillor Capewell asked for an assurance that this process would include a fair representation of the costs. The Head of Service confirmed that this was correct.

Councillor Waters-Bunn asked what would happen to staff who had a Council pension and who did not want to be TUPE'd over. The Head of Service reported that the staff would have to resign and their pension would be frozen and as they would have been offered alternative employment they will have legally made themselves jobless.

Councillor Waters-Bunn highlighted that the change would be very scary for the elderly and vulnerable service users and that she hoped that they would be fully supported through the transition period. The Head of Service reported that nothing would change in the operation of the service for the service users and any change of kit would be introduced gradually. The Tenancy Support Officers would fully support the SH tenants. Councillor Jeal reported that he shared the concerns of Councillor Waters-Bunn.

Councillor Jeal proposed that the duration of the meeting be extended by thirty minutes. This was seconded by Councillor Capewell.

At 20:23, the Chair paused the meeting for a 5 minute comfort break.

The meeting resumed at 20:30.

Councillor Jeal reported that it was imperative that all staff receive information face-to-face and not via email if it related to their conditions of employment.

Councillor Wainwright reiterated his request that officers contact Mediquip and East Suffolk Council. The Head of Service reported that Mediquip did not meet our requirements as they did not have any local call centres, the nearest office was in Ipswich and was not 24/7. ESC was not TSA accredited and therefore did not meet our requirements.

Councillor Wainwright withdrew his request in relation to Mediquip but proposed that Officers find out why ESC were not TSA accredited. This proposal was seconded by Councillor Jeal and following a vote was approved.

Councillor Capewell proposed that an Open Framework Tender was carried out to ensure the process was open and transparent. The CEO reported that the Council intended to use a framework and that this voided the proposal. The proposal was seconded by Councillor Jeal but lost at the vote.

The Chair summarised the feelings of the Committee as follows:-

- (i) The Committee recognise that there is a need for change and for the analogue

system to be upgraded as soon as possible,

(ii) The Committee commented on the need for the Council to evidence best practice when communicating changes to its services, which could impact staff and job roles. The Committee requested that communication be given in person and not via email and this to be the case for all services across the Council in the future,

(iii) That in future, information regarding any significant changes to a Council service of a similar nature be reported to the Leader, Shadow Leader, responsible Cabinet Member and Chair of Scrutiny Committee; and

(iv) The Committee requested that Officers discuss further, the requirements for this service being delivered by East Suffolk Council and investigate if their own in-house service has been improved and is now TSA accredited.

RESOLVED:-

That Cabinet are asked to consider the following recommendations and comments from the Scrutiny Committee :-

(i) The Committee recognise that there is a need for change and for the analogue system to be upgraded as soon as possible,

(ii) The Committee commented on the need for the Council to evidence best practice when communicating changes to its services, which could impact staff and job roles. The Committee requested that communication be given in person and not via email and this to be the case for all services across the Council in the future,

(iii) That in future, information regarding any significant changes to a Council service of a similar nature be reported to the Leader, Shadow Leader, responsible Cabinet Member and Chair of Scrutiny Committee; and

(iv) The Committee requested that Officers discuss further, the requirements for this service being delivered by East Suffolk Council and investigate if their own in-house service has been improved and is now TSA accredited.

The meeting ended at: TBC

URN: 23-106

Report Title: Performance Management (Capability) Policy & Process

Report to: Cabinet

Date of meeting: 29 January 2024

Responsible Cabinet Member: Councillor Carl Smith

Responsible Director / Officer: Karen Sly/Sarah Tate

Is this a Key decision? No

Date added to Forward Plan of Key Decisions if a Key Decision: N/A

EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

This report presents the new Performance Management policy to cabinet following full consultation with the Executive Leadership Team (ELT), UNISON and the Joint Consultative Working Group (JCWG).

RECOMMENDATIONS:

That Cabinet

- 1.** Approves the new Performance Management Policy and;
- 2.** Gives delegated authority to the Head of Organisational Development to make minor and/or consequential amendments to the Policy for the purpose of keeping it up to date, clarifying its content or interpretation, correcting any errors or omissions, updating it in accordance with changes in legislation, and/or caselaw, or with changes in the management structure.

1. Introduction

The Council provides essential and important services to the borough and its residents. Key to it being able to function at the required level is ensuring that our employees are competent to undertake the whole of their role at an acceptable and safe standard.

This policy, which has been agreed with Unison, takes into account the Acas Code of Practice on disciplinary & grievance procedures and sets out the procedure which we will normally follow when performance has been identified as falling below an acceptable level. Its purpose is to provide a framework for resolving poor performance in a fair and supportive manner. All employees have a duty to cooperate with Council policies and will be encouraged to help identify the reason(s) for poor performance and how it can be improved.

The current policy has been revised taking account of up-to-date legislation, the ACAS Code of Practice and reflects learnings from recent cases and case law.

2. Work to date/proposal

The policy has been thoroughly reviewed and updated by HR and has been through the consultation process with ELT, UNISON and JCWG aiming to help managers and employees who are involved in the process, to signpost the support available, consistent with other recent policies.

Feedback has been constructive and only minor amendments were made to the draft policy for clarity. UNISON and the JCWG, independently provided very similar feedback.

It is proposed that Cabinet approve the policy.

The Head of Organisational Development is seeking delegated authority to make minor and/or consequential amendments to the Policy for the purpose of keeping it up-to-date, clarifying its content or interpretation, correcting any errors or omissions, updating it in accordance with changes in legislation and/or case law, or with changes in the management structure.

3. Impact / Next Steps

Once the policy has been approved it will be made available to staff via the Loop and training will be provided as and when required.

4. Financial Implications

None at this stage.

5. Risk Implications

The current policy is out of date and needed revision. The risk of not approving this policy is that we continue to work with an outdated policy which is not fit for purpose.

6. Legal Implications

The revised policy considers and is compliant with all relevant employment legislation, ACAS guidance and case law.

7. Background Papers

- Current Capability Policy
- ACAS Code of Practice

Consultations	Page 45 of 666	Comment
Monitoring Officer Consultation:		Considered

Section 151 Officer Consultation:	Considered
Existing Council Policies:	Capability Policy
Financial Implications:	Considered
Equality Issues/EIA:	Considered

Performance Management (Capability) Policy & Procedure

Author	Human Resources
Version No.	2
Updated by	HR
Date of update	January 2024
Description of changes to this version	Updated
Document Status	DRAFT
Next review date:	November 2026

1 Introduction

- 1.1 The Council provides essential and important services to the borough and its residents. Key to it being able to function at the required level is ensuring that our employees are competent to undertake the whole of their role at an acceptable and safe standard.
- 1.2 This policy, which has been agreed with Unison, takes into account the Acas Code of Practice on disciplinary & grievance procedures and sets out the procedure which we will normally follow when performance has been identified as falling below an acceptable level. Its purpose is to provide a framework for resolving poor performance in a fair and supportive manner. All employees have a duty to cooperate with Council policies and will be encouraged to help identify the reason(s) for poor performance and how it can be improved.
- 1.3 This policy applies to all Council employees, other than the Chief Executive and Chief Officers who are covered by separate arrangements and also employees who are subject to an initial probationary review period, who will be managed under the Probationary Policy.
- 1.4 This policy does not form part of your contract of employment, and we reserve the right to amend or remove it.
- 1.5 Day-to-day supervision of employees is outside the procedure's scope. For example, there will be occasions when it is appropriate for a manager to discuss issues with an employee as part of normal supervisory arrangements and without recourse to the formal procedures.
- 1.6 Timescales given under this policy may be varied, including by mutual consent, or where the unsatisfactory performance is considered to be sufficiently serious, when the procedure may be shortened.
- 1.7 This policy applies to capability related to performance. For capability related to ill health or sickness absence, refer to The Sickness Management Policy.
- 1.8 No matter what the outcome, we will keep a written record of all performance management cases to help with any questions or similar cases in the future.

2 Employee Assistance Programme – provided by Vivup / Norfolk Support Line

Our employees have access to free confidential telephone support 24/7, 365 days a year to Norfolk Support Line, including face to face and virtual counselling, self-help workbooks and podcasts and blogs. Norfolk Support Line also provide a range of information and signposting for practical support for problems at work and at home. To access the service call 0800 169 7676, or go to the Norfolk Support Line website.

3 Definitions of performance management and capability

- 3.1 For the purposes of this policy, 'capability' refers to an employee's ability to do their job, including their skills, ability, aptitude, knowledge and also their attitude and/or behaviours, where it is having a negative or detrimental effect on the required job performance. Capability due to performance will be managed under this policy and will be referred to as 'performance management', the process by which performance concerns will be managed.

3.2 It should be noted that there can be a close relationship between performance, health/attendance and conduct and sometimes the circumstances may mean that we need to follow more than one policy at the same time or switch to using a different policy.

For example, if we decide that the issues are misconduct-related (i.e., general poor attitude/behaviours, an unwillingness to improve, believed to be the result of deliberate negligence or where serious errors have been made to the detriment of the organisation) rather than performance related (i.e., due to inability), we may decide to use our disciplinary procedure instead. Steps taken under this Policy will be taken into account and we won't do the same things twice unless there's a compelling reason to do so.

Where an employee's inability to meet required standards of performance may be due to ill-health or absence, reference should be made to the Council's Sickness Management Policy and Procedure.

4 Our expected standards

The standards of performance which we expect you to achieve are communicated to you in several ways including:

- In your job description, which sets out the basic requirements of your role.
- Reasonable duties and tasks in addition to your job description but commensurate with your grade, the role and your abilities
- Through 1-1 meetings with your line manager. It is the responsibility of your line manager to set the required standards for your role and ensure that they are met.
- Through our PDR (appraisal) process, where you will work with your line manager to set clear performance objectives which will be reviewed regularly.
- Through day-to-day feedback you receive from your line manager and those you work with.
- Through our Values, contained within The Plan 2020-2025 (accessible on the Loop), and [Agreed Behaviours Framework](#)
- Through our Customer Service Charter https://the-loop.great-yarmouth.gov.uk/media/3544/Customer-Service-Charter-Poster/pdf/Customer_Service_Charter_-_Poster.pdf?m=1539800340880
- Through the Officers Code of Conduct, which is at Article 44 of the [Council's Constitution](#).

5 Fairness and respect

Everyone is entitled to be treated calmly and with respect and we will not tolerate abusive or insulting behaviour, including from anyone taking part in a performance management procedure, and will treat any such behaviour as potential misconduct (see Disciplinary Policy).

5.1 If you have any misgivings about either the process, or the manager leading it, you should tell us openly so that we can address your concerns. You can do this by speaking to your manager, if you feel able to, or by speaking to HR; alternatively, you may wish to refer to the Grievance Policy.

5.2 If you have a disability or are aware of a health-related or other reason which may be underpinning a performance concern, or which may prevent you from participating in the management of your performance, you should inform your manager and HR as soon as possible. If we think that a disability, health or other reason may be impacting on your performance we will discuss it with

you, and depending on the circumstances, we may seek your consent to refer you to Occupational Health. Referrals are made by HR.

5.3 Referrals to Occupational Health are intended to be a supportive measure and you are strongly advised to consent to a referral to Occupational Health when requested, to attend an appointment with Occupational Health (which may be by phone/Teams or face to face) and agree to the release of a report. You should be aware that where you do not, the manager / Head of Service / Appeal Officer may proceed with a meeting/hearing without the benefit of advice from occupational health and will have to make decisions based on the information they have available to them, in consultation with HR. As this could be to your disadvantage, you are strongly advised to speak to your union representative, if you have one, or HR.

5.4 We will make every effort to ensure that any meeting (*for the purposes of this policy 'meeting' includes meetings or hearings*) we hold under this procedure is scheduled for a time and place that is reasonable and within your normal working hours. You (and your colleague/representative(s)) should make every effort to attend the hearing. You should let us know as soon as possible if there is a reason why you or your chosen companion cannot attend the meeting at the arranged time.

- If you are unable to attend a meeting you should inform the manager and HR as soon as possible, with an explanation.
- If you feel you are not able to attend a meeting due to ill health or disability, you should discuss this with the line manager and HR as soon as possible. With your consent, we will normally seek a medical opinion/advice from the Council's Occupational Health provider (see 5.2 and 5.3 above).
- If you are unable to attend a meeting face-to-face, you should inform the manager and HR as soon as possible, so that we can look at alternative ways of conducting the meeting, which may involve holding it at an alternative location or conducting it remotely (we will seek to ensure that you and your representative, if you have one, have access to the necessary technology for participating in the meeting and that the procedure remains fair and reasonable).
- If you fail to attend a meeting without notifying us in advance, we will seek to ascertain the reason(s) and consider how it should be managed i.e., proceed with the meeting, arrange a further meeting or make an OH referral (with your consent), manage it as unauthorised absence or other.
- If your chosen companion/trade union representative cannot attend on a proposed date, you can suggest an alternative time and date so long as it is reasonable and is not normally more than 10 working days after the original date (unless due to exceptional circumstances), otherwise we reserve the right to proceed with the original meeting.
- We will usually reschedule a meeting once, provided we are satisfied with your reason for not attending, for a jointly agreed time not normally exceeding 10 working days. We will not reschedule the meeting a second time unless there is a very good reason to justify this.
- Note that depending on the circumstances we may not reschedule a meeting at all if we decide it is likely to lead to an unreasonable delay and we may instead have to make our decision on the performance issue without you being present.
- By agreement with the Chair of the meeting, you may send your colleague/representative to a meeting on your behalf and/or may make representations in writing. However, we reserve the right to proceed with a meeting in your absence when it has not been possible to arrange a meeting that you are able to attend.

5.5 A written record of all meetings conducted under this procedure will be made, either by the person holding the meeting or by an additional person arranged by us to take notes, for example a member of HR or Democratic or Executive Services; notes taken will be shared with you. You, or

any person acting on your behalf, may also take your own notes if you wish to but you are not normally permitted to record electronically any meeting that we hold under this procedure. This is to encourage openness and full participation.

We may choose to record, or permit a meeting to be recorded electronically, when we will take responsibility for making the recording, including a meeting which is held remotely, provided that all parties agree. Any such recording will be made in line with our data protection obligations.

You or your companion must not covertly record a meeting e.g., using a mobile phone, as this suggests that you do not trust our process or the managers who are conducting the hearing. If you/your companion covertly record a meeting, or attempt to do so, it will be considered a breach of this provision and dealt with under the Disciplinary Policy, which may lead to disciplinary action, which could include dismissal. If you have misgivings about either the process or the managers leading it, you should tell us openly so that we can address your concerns. In turn, we will not record the meeting without your knowledge.

- 5.6 We will keep a written record of any performance management cases we deal with and will place information on the relevant employee file(s). This will be processed in accordance with our [Data Protection Policy](#).
- 5.7 Sometimes circumstances may prevent parts of this procedure from being followed in full and may require a change. For example, if a specified manager/meeting chair is unavailable, we may appoint an alternative.
- 5.8 Managers should remind employees of the support available from the Council's Employee Assistance Programme, Norfolk Support Line and continue to hold regular 1-1's and PDR's.

6 Right to be accompanied

- 6.1 You are entitled to be accompanied by a colleague (companion), an official employed by a trade union or a workplace trade union representative, who is not acting in a legal capacity, at all meetings held under the formal performance management procedure. Informal meetings or discussions, 1-1's, PDRs, and mediation or counselling sessions do not attract the right to be accompanied.
- 6.2 If you want to be accompanied, you should tell your line manager/the meeting chair as soon as possible who you want to accompany you and the capacity in which they are attending. If you choose a work colleague, they must not be involved in matters relating to your performance management or be a close relative. It is your responsibility to arrange for them to attend. We will not prevent them from attending, but we may rearrange the meeting if their absence from work could cause operational problems.
- 6.3 You may, at management's discretion, also be allowed to bring a companion who is not a colleague or union representative. This will be considered in circumstances such as where your first language is not English, or to help overcome a disability, when you may be allowed to bring a support worker or family member experienced in managing your disability, who is not acting in a legal capacity or involved in your case.

6.4 Should there be a formal meeting, your colleague or union representative can, if you prefer, explain the key points of your case to the meeting and can respond on your behalf. You can also confer with them during the meeting. However, they must not answer questions put directly to you, or try to prevent us asking questions or outlining our arguments.

7 Performance Management Procedure

7.1 Serious performance concerns / gross incapability of performance

In exceptional circumstances the actions and omissions of an employee may be considered gross incapability/incompetence. This would occur where the actual/potential consequences of any action/omission are considered so serious as to render the continued employment of the employee impossible, e.g., where others are put at risk of serious injury or death, or the Council's finances or reputation are put at serious risk.

In such cases consideration will be given to suspending you from duty pending further investigation and to allow a Performance Management Hearing to be convened. If the lack of performance is considered to be so serious as to amount to gross incapability / incompetence you may be dismissed without previous warning and without notice (i.e., summary dismissal) at the Hearing.

7.2 Suspension and alternative options

Where we consider your performance/lack of ability to be so serious as to endanger the welfare and safety of the public and/or your colleagues, your manager will consider whether there is a need to suspend you from work as a precautionary measure. If you are suspended it will be on full pay, subject to you being contactable and available to attend work and/or meetings and not undertaking work with another employer.

Managers should only use suspension after very careful consideration as it can leave individuals feeling prejudged, demotivated and devalued. You should be reassured that a fair procedure will follow in which your point of view will be listened to and fairly considered.

For the procedure which should be followed when considering suspending an employee, including consideration of alternative options, managers/decision makers must refer to the suspension checklist (see Disciplinary Policy) and ACAS advice: www.acas.org.uk/suspension-during-an-investigation. A file note of the considerations will be made by the manager and retained with the performance management case.

Managers should bear in mind that some people may find it upsetting to be suspended and consider when and how to communicate a decision about suspension. If you are suspended, they may encourage you to access some immediate support and to offer help to do this, for example, to offer to contact a colleague, friend or relative of their choosing to meet you immediately and remind you of the employee of the Council's Employee Assistance Programme, provided by Norfolk Support Line.

Your line manager/designated deputy should maintain contact with you, to check on your health and welfare and offer support, where possible this should normally be a minimum of weekly. You should remain contactable during your normal working hours and should contact your manager or HR if you need advice, help or support.

The suspension should be regularly reviewed by the person who made the original decision to suspend.

7.3 Informal performance management

When your manager has a concern about your performance, they will usually manage it informally in the first instance, as part of the normal line management process. They should raise their concerns with you as soon as they arise, which may be via the 1-1 process, providing confirmation of the standard that is expected of you and the timescales by which the required improvement should be made. You should engage in such discussion and help identify any factors which you believe may be contributing to it, and anything which may help resolve it, so that your manager can take it into account when considering suitable and reasonable steps to support you and help you to improve your performance, such as further training, additional support, reallocation of work and/or other measures.

Your manager will make a written record of the meeting (see Section 5.5) which will detail the concerns shared with you, the standards required and the support you will be provided to achieve this standard. You can make a written record but must not record meetings, including covertly; to do so, or attempt to do so, may lead to disciplinary action including dismissal. If you have any concerns about the support provided, you should speak to your manager in the first instance, if you feel able to, or HR, or your union representative, if you have one.

The details of the meeting/1:2:1 and agreed actions should be confirmed in writing, usually within 2 working days of the meeting. A Performance Improvement Plan (PIP) may also be prepared and form part of this.

In exceptional circumstances, where your manager considers that informal management has not resolved the performance issues within the required timescales, they may extend the period of review or refer to the formal stages of this policy and will inform you of this.

If your manager considers that the performance issues are sufficiently serious that they need to be placed on a formal footing at an early stage, you will be informed of this and the reason(s) why.

7.4 Performance Improvement Plan (PIP)

A PIP is a document we use to provide employees with a structured approach to help them to work to their full potential and should help you to focus on the improvement required and for your manager to assess improvement. It can be put in place at an informal stage, following a performance review or a 1-1 meeting in circumstances where you are experiencing difficulties in doing your job role or meeting specific targets and/or during or following an informal or formal performance improvement meeting. HR can provide advice and a template to managers.

Your line manager may prepare a PIP with you, outlining any existing performance issues in relation to you, including possible reasons for you underperforming and outlining ways in which performance issues can be addressed. Whilst we will seek to agree the PIP with you, we reserve the right to insist on any aspect of the PIP if agreement cannot be reached.

A PIP should:

- a Identify the particular areas where improved performance is required.
- b Consider/explain the possible cause(s) of these issues
- c Describe the areas that need improvement and the expected standard
- d Describe the evidence we will look at to check whether those standards have been met.

- e Set out the timescale in which the necessary improvement must be achieved for meeting the expected standards, including any incremental goals, objectives or targets.
- f Set out any supportive measures we will put in place to help you meet those objectives. This may include training, additional supervision, the reallocation of duties and the provision of additional support from your colleagues.
- g Set out the next date for you and your manager to meet to review the performance.

You will be given regular feedback from your line manager indicating the extent to which you are on track to deliver the required improvements. If at any stage your manager feels that your performance is not progressing in a satisfactory way, a further meeting may be held with you to discuss this and where appropriate, your PIP may be amended and/or extended (in exceptional circumstances) or you may be asked to attend a formal meeting under the next stage of this procedure. Where your performance worsens, action may be taken before the end of the review period.

7.5 Agreed Outcome

If, before, or during performance management, an employee admits, acknowledges and/or accepts the allegations made against them regarding their performance and the facts are not in dispute the Designated Manager may, with the agreement of the relevant Head of Service and Head of Organisational Development and the member of staff, proceed to issue a sanction, as an Agreed Outcome.

If an Agreed Outcome is reached, matters will be concluded without going through a Performance Management Hearing. If you are considering an Agreed Outcome you are encouraged to speak to your union representative, if you have one, or you may wish to speak to a colleague or contact HR if you do not (HR cannot make the decision for you). An Agreed Outcome will not be offered or accepted in cases of gross misconduct/gross incompetency, where the sanction is potentially dismissal. Prior to an Agreed Outcome, the relevant Head of Service and Head of Organisational Development will consider whether it is appropriate to offer an Agreed Outcome and if so, the outcome which they are prepared to agree, including the level and duration of any sanction to be imposed. Any agreed outcome will be in writing and will require the individual's signature to confirm acceptance.

A request from you for an Agreed Outcome must be made by in writing and must state that it is a request for an Agreed Outcome under this Procedure.

Alongside an Agreed Outcome you will be issued with a PIP/revised PIP.

7.6 Formal performance management procedure

• Formal performance management: Stage 1 Performance management meeting

Where your line manager believes that there is a persistent or more serious problem of poor performance or the required performance has not been sustained and normal/informal day-to-day management has not brought about the required improvement, they will proceed with formal performance management and arrange a Stage 1 Performance Management Meeting, which they will usually chair, supported by HR.

You will be given a minimum of 14 calendar days' notice of the meeting (unless agreed otherwise), which will be confirmed in writing, with case papers to give you time to prepare, with a copy to HR, including:

- That you are invited to a Stage 1 Performance Management meeting,
- The date, time and venue for the meeting along with details of who will be attending i.e., the name of the manager and HR Advisor (and note taker if applicable). (You or your companion can make a written

record but must not record meetings, including covertly, and to do so or attempt to do so may lead to disciplinary action including dismissal. – see Section 5.5).

- A copy of this policy, which we advise you to read in full.
- Details of the areas of performance which require improvement and any documents that will be referred to i.e., 1-1's, PIP.
- That you should submit any documents you wish to be considered to the manager and HR at least 5 calendar days in advance of the meeting.
- That you can be accompanied if you wish. (Section 6 Your right to be accompanied).
- The contact details for our Employee Assistance Programme (Section 2).
- Possible outcomes of the meeting (including whether dismissal might result).

You should review the evidence provided and contact us as soon as possible if there are any other documents, or further evidence, which you would like us to consider. Please provide copies to the Chair and HR of anything you want us to look at least 5 working days before the hearing.

All parties should make every effort to attend the meetings. If you or your chosen companion cannot attend a meeting(s) please let your manager and HR know as soon as possible and refer to Section 5.0, in particular 5.2 and 5.3.

At the meeting:

- Introductions will be made and an overview of how the meeting will be conducted will be given.
- We may arrange for an additional person to make a written/record of the meeting – see Section 5.4.
- The purpose of the meeting will be explained, which is to consider the concerns, including the gap between your actual performance and the required performance, referring to specific examples where possible and any steps taken at earlier stages of the policy.
- We will give you the time and opportunity to respond to the concerns and to put your own case. We will also give you the opportunity to ask questions and present your own evidence. You may request an adjournment of the hearing at any stage.
- The main points of the discussion will be summarised. You can summarise and/or add information if you wish to.
- The meeting will usually be adjourned before a decision is taken to enable the Chair to consider their decision. We may advise you of the outcome following the adjournment, or in writing as soon as possible, usually within 5 working days of the meeting.

Possible outcomes of the meeting include:

- No further action.
- A referral to Occupational Health. if deemed necessary, for which we will seek your consent. The outcome of the meeting may be delayed pending the outcome of this.
- Referring the matter for investigation under the disciplinary procedure, if it is considered to be due to misconduct rather than performance.
- An offer to redeploy you to alternative work, which will be entirely at our discretion. Such an offer will be made only where we are confident that you will be able to perform well in the redeployed role. Redeployment may involve offering you a less challenging role or a role with lesser responsibility, which would not therefore be an equivalent post in terms of seniority and/or pay, for example, and where there will be no salary protection. You would move to the terms and conditions of the new post with immediate effect and would enter the pay range at the equivalent spinal point position where you were in your previous post. Redeployment will only go ahead with your agreement, and you are able to refuse an offer of redeployment if you wish, however the Chair will have to consider which/whether one of the other possible outcomes should apply.

- The issuing of a First Written Warning for performance which will set out:
 - The performance shortfall(s).
 - The required improvement, which will act as a management instruction.
 - The timescale for improvement – i.e., 4 weeks. This will be determined by the manager and discussed with you, taking into account your performance vs the required performance, and any impact it is having i.e., on the manager, your colleagues, the service level / delivery. These timescales should normally be long enough to ensure that there is adequate time to make the required improvements without being detrimental to the Council.
 - Any action that management will take to help you to achieve the required performance i.e., support and/or training – this will usually include the writing of a PIP, if one is not already in place.
 - Any action you need to take to achieve and sustain the required level of performance.
 - That your performance will be monitored and reviewed including toward/at the end of this timescale i.e., 4 weeks, when a decision will be made as to whether it should be escalated to Stage 2 of this procedure, should you fail to achieve the required level of improvement during this time or when any improvement has not been sustained.
 - How long the warning will be in place. Under this policy, First or Final Written Warnings are usually be issued for a period of up to 12 months. Your manager will review your performance during this time and after the period defined above i.e., 4 weeks, and/or as required.
 - That you have a right of appeal against the decision to issue you with a Written Warning for performance.
- Approximately halfway through the timescale i.e., 2 weeks if the timescale is 4 weeks, your manager will meet with you informally to discuss and assess progress and highlight any areas still needing to be addressed. The manager will produce notes of the meeting and share these with you within one week. If the standard of work is still unacceptable, this will be clearly stated.
- At the end of the timescale i.e., 4 weeks, your manager will meet with you to review your performance with you. In doing so, they will consider whether your performance has improved to the required level, and has been sustained at the required level, and make a decision:
 - Where your performance has improved to the required level, they will inform you in writing and continue to monitor your performance for the period of the warning. As long as you maintain your performance at the required level no further action should be required. Where performance subsequently lapses during the period of the warning, a further 4-week review period will be required and if there is no improvement/the required improvement after that, or if there is a further lapse the manager will consider whether it should proceed to a formal hearing.
 - Where a Stage 1 warning has not led to the required improvement in performance within the timescale specified, or the improvement has not been sustained, the next stage of the procedure will be triggered. You will be informed in writing, with a copy to HR, and details of the arrangements for the next formal meeting. I.e., where a First Written Warning was issued, a Stage 2 meeting will be arranged.

- **Formal performance management: Stage 2 Performance meeting**

Where a Stage 1 Performance meeting and the issuing of a First Written Warning for performance has not brought about the required improvement, or an improvement has not been sustained, the manager will arrange a Stage 2 Performance Meeting, which they will usually chair, supported by HR.

You will be given a minimum of 14 calendar days' notice of the meeting (unless agreed otherwise), which will be confirmed in writing with case papers to give you time to prepare, with a copy to HR, including:

- That you are invited to a Stage 2 Performance Management meeting.
- The date, time and venue for the meeting along with details of who will be attending i.e., the name of the manager and HR Advisor (and note taker if applicable). (You or your companion can make a written record but must not record meetings, including covertly, and to do so or attempt to do so may lead to disciplinary action including dismissal. – see Section 5.5).
- A copy of this policy, which we advise you to read in full.
- Details of the areas of performance which require improvement, any documents that will be referred to i.e., 1-1's, PIP and previous warning(s) given under this policy.
- That you should submit any documents you wish to be considered to the manager and HR at least 5 calendar days in advance of the meeting.
- That you can be accompanied if you wish. (Section 6 - Your right to be accompanied).
- A reminder of the contact details for our Employee Assistance Programme (Section 2).
- Possible outcomes of the meeting (including whether dismissal might result).

You should review the evidence provided and contact us as soon as possible if there are any other documents, or further evidence, which you would like us to consider. Please provide copies to the Chair and HR of anything you want us to look at least 5 working days before the hearing.

All parties should make every effort to attend the meetings. If you or your chosen companion cannot attend a meeting(s) please let your manager and HR know as soon as possible and refer to Section 5.0, in particular 5.2 and 5.3.

At the meeting:

- Introductions will be made and an overview of how the meeting will be conducted will be given.
- We may arrange for an additional person to make a written/record of the meeting – see Section 5.4.
- The purpose of the meeting will be explained, which is to consider the concerns, including the gap between your actual performance and the required performance, referring to specific examples where possible and any steps taken at earlier stages of the policy.
- We will give you the time and opportunity to respond to the concerns and to put your own case. We will also give you the opportunity to ask questions and present your own evidence. You may request an adjournment of the hearing at any stage.
- The main points of the discussion will be summarised. You can summarise and/or add information if you wish to.
- The meeting will usually be adjourned before a decision is taken to enable the Chair to consider their decision. We may advise you of the outcome following the adjournment, or in writing as soon as possible, usually within 5 working days of the meeting.

Possible outcomes of the meeting include:

- No further action.

- A referral to Occupational Health, if deemed necessary, for which we will seek your consent. The outcome of the meeting may be delayed pending the outcome of this.
- Referring the matter for investigation under the disciplinary procedure, if it is considered to be due to misconduct rather than performance.
- An offer to redeploy you to alternative work, which will be entirely at our discretion. Such an offer will be made only where we are confident that you will be able to perform well in the redeployed role. Redeployment may involve offering you a less challenging role or a role with lesser responsibility, which would not therefore be an equivalent post in terms of seniority and/or pay, for example, and where there will be no salary protection. You would move to the terms and conditions of the new post with immediate effect and would enter the pay range at the equivalent spinal point position where you were in your previous post. Redeployment will only go ahead with your agreement, and you are able to refuse an offer of redeployment if you wish, however the Chair will have to consider which/whether one of the other possible outcomes should apply.
- The issuing of a Final Written Warning for Performance which will set out:
 - The performance shortfall(s).
 - The required improvement, which will act as a management instruction.
 - The timescale for improvement – i.e., 4 weeks. This will be determined by the manager and discussed with you, taking into account your performance vs the required performance, and any impact it is having i.e., on the manager, your colleagues, the service level / delivery. These timescales should normally be long enough to ensure that there is adequate time to make the required improvements without being detrimental to the Council.
 - Any action that management will take to help you to achieve the required performance i.e., support and/or training – this will usually include the writing of a PIP, if one is not already in place.
 - Any action you need to take to achieve and sustain the required level of performance.
 - That your performance will be monitored and reviewed including toward/at the end of this timescale i.e., 4 weeks, when a decision will be made as to whether it should be escalated to Stage 2 of this procedure, should you fail to achieve the required level of improvement during this time or when any improvement has not been sustained.
 - How long the warning will be in place. Under this policy, First or Final Written Warnings are usually issued for a period of up to 12 months. Your manager will review your performance during this time and after the period defined above i.e., 4 weeks, and/or as required.
 - That you have a right of appeal against the decision to issue you with a Final Written Warning for performance.
- At the end of the timescale i.e., 4 weeks, your manager will meet with you to review your performance with you. In doing so, they will consider whether your performance has improved to the required level, and been sustained at the required level, and make a decision:
 - Where your performance has improved to the required level, they will inform you in writing and continue to monitor your performance for the period of the warning. As long as you maintain your performance at the required level, no further action should be required. Where performance subsequently lapses during the period of the warning, a further 4-week review period will be required and if there is no improvement/the required improvement after that, or if there is a further lapse the manager will consider whether it should proceed to a formal hearing.
 - Where the warning has not led to the required improvement in performance within the timescale specified, or the improvement has not been sustained, the next stage of the

procedure will be triggered. You will be informed in writing, with a copy to HR, and details of the arrangements for the next formal meeting. Where a Final Written Warning was issued, a Stage 3 Performance Meeting will be arranged, where one of the possible outcomes is dismissal for capability (performance).

- **Formal Performance management: Stage 3 performance Management Meeting**

Where a Stage 2 Performance Management meeting and the issuing of a Final Written Warning for Performance has not brought about the required improvement, or an improvement has not been sustained, the manager will arrange a Stage 3 Performance Hearing, which will be chaired by a Head of Service and supported by HR. The line manager will be asked to prepare a report and attend the meeting to present it and to respond to any questions. You may ask questions and may also be asked questions.

You will be given a minimum of 14 calendar days' notice of the meeting (unless agreed otherwise), which will be confirmed in writing with case papers to give you time to prepare, with a copy to HR, including:

- That you are invited to a Stage 3 Performance Management meeting.
- The date, time and venue for the meeting along with details of who will be attending i.e., the name of the manager and HR Advisor (and note taker if applicable). You or your companion can make a written record but must not record meetings, including covertly, and to do so or attempt to do so may lead to disciplinary action including dismissal. – see Section 5.5.
- A copy of this Policy, which we advise you to read in full.
- Details of the areas of performance which require improvement, any documents that will be referred to i.e., 1-1's, PIP and previous warning(s) given under this policy.
- That you should submit any documents you wish to be considered to the manager and HR at least 5 calendar days in advance of the meeting.
- That you can be accompanied if you wish. (Please refer to section 6 Your right to be accompanied).
- Possible outcomes of the meeting (including whether dismissal might result).
- A reminder of the contact details for our Employee Assistance Programme (Section 2).
- That you should submit any documents you wish to be considered to the manager and HR at least 5 calendar days in advance of the meeting.
- That you can be accompanied if you wish. Refer to 'Your right to be accompanied'.
- Possible outcomes of the meeting, including that dismissal might result.

You should review the evidence provided and contact us as soon as possible if there are any other documents, or further evidence, which you would like us to consider. Please provide copies to the Chair and HR of anything you want us to look at least 5 working days before the hearing.

All parties should make every effort to attend the meetings. If you or your chosen companion cannot attend a meeting(s) please let your manager and HR know as soon as possible and refer to Section 5.0, in particular 5.2 and 5.3.

At the meeting:

- Introductions will be made and an overview of how the meeting will be conducted will be given.
- We may arrange for an additional person to make a written/record of the meeting – see Section 5.4.
- The purpose of the meeting will be explained, which is to consider the concerns regarding your performance i.e., the gap between your actual performance and the required performance, referring to specific examples where possible and any steps taken at earlier stages of the policy.
- The manager will be asked to present their case and to answer any questions.

- You will be given the time and opportunity to ask questions, respond to the concerns raised and to present your own case.
- Either party may request an adjournment of the hearing at any stage
- The main points of the discussion will be summarised. You can summarise and/or add information if you wish to.
- The meeting will usually be adjourned before a decision is taken to enable the Chair to consider their decision. We may advise you of the outcome following the adjournment or at a later date; where possible we will do so in person, and in any event the decision will be confirmed in writing, usually within 5 working days of the meeting.

Possible outcomes of the meeting include:

- No further action. (With details of possible outcomes should performance subsequently lapse).
- A referral to Occupational Health. if deemed necessary, for which we will seek your consent. The outcome of the meeting may be delayed pending the outcome of this.
- Referring the matter for investigation under the disciplinary procedure, if it is considered to be due to misconduct rather than performance.
- An offer to redeploy you to alternative work, which will be entirely at our discretion. Such an offer will be made only where we are confident that you will be able to perform well in the redeployed role. Redeployment may involve offering you a less challenging role or a role with lesser responsibility, which would not therefore be an equivalent post in terms of seniority and/or pay, for example, and where there will be no salary protection. You would move to the terms and conditions of the new post with immediate effect and would enter the pay range at the equivalent spinal point position where you were in your previous post. Redeployment will only go ahead with your agreement, and you are able to refuse an offer of redeployment if you wish, however at this stage the only alternative available will usually be dismissal. If we consider that there is no suitable alternative role available, you may be dismissed.
- A decision to dismiss you on the grounds of performance. Any dismissal will be with full notice, or a payment in lieu of notice, unless it is due to gross incompetency/summary dismissal, when no notice is due.

- **Formal performance management: Right of appeal**

At each stage of the formal process (Stages 1, 2 and 3), you have the right to appeal against the decision made.

In relation to Stage 1, 2 and Stage 3 appeals, we may choose to continue with the performance improvement process while your appeal is being considered, unless you have been dismissed. This is to prevent the process from being derailed, or delayed, by one or more appeals being inserted into the timeframe.

You must submit your appeal in writing within 10 working days of receiving your outcome letter, clearly setting out what stage and outcome you are appealing and your grounds for appeal, to the HR department. Please also let us know if you will be accompanied and if so, in what capacity they will be attending (see Section 6. Right to be accompanied) to hr@great-yarmouth.gov.uk.

Once we have received your letter of appeal, we will arrange an appeal hearing. An Appeal Officer will be appointed to hear your appeal. Appeal Officers will not usually have had any involvement in the process or the allegation up to this point. For Stages 1, 2 and 3 the Appeal Officer will usually be a Head of Service, supported by an HR, except where your appeal is against dismissal, when the Appeal Officer will usually be a member(s) of the Executive Leadership Team (ELT), supported by HR.

You will be given a minimum of 14 calendar days' notice of the meeting (unless agreed otherwise), which will be confirmed in writing, with a copy to HR, including:

- The arrangements for your appeal hearing, including date, time and venue and details of who will be attending i.e., the name of the Chair, HR representative (and note taker if applicable). You or your

companion can make a written record but must not record meetings, including covertly - see Section 5.5.

- A copy of this policy, which we advise you to read in full.
- That you should submit any additional documents you wish to rely on to the manager and HR at least 5 calendar days in advance of the meeting.
- That you can be accompanied if you wish. (Please refer to section 6 Your right to be accompanied).
- Possible outcomes of the meeting.

All parties should make every effort to attend the meetings. If you or your chosen companion cannot attend a meeting(s) please let your manager and HR know as soon as possible and refer to Section 5.0, in particular 5.2 and 5.3.

The appeal could involve a review of the original decision, taking account of the specific grounds of appeal you have raised. Alternatively, it could involve a full re-hearing of the matter. HR and the appropriate appeals manager will decide which approach is most appropriate for your case.

You should be aware that our appeal officers are not limited in their options when considering your appeal. They can, if they believe it appropriate, decrease a sanction, approve/confirm the original outcome, remove a sanction or in some cases, increase a sanction, where there is justification for doing so. Where a sanction is increased the employee will have a further right of appeal.

Appeal hearing

For appeals against warnings issued at Stage 1, Stage 2 and 3 the Chair (Appeal Officer) will usually be a Head of Service, supported by HR, except where your appeal is against dismissal, when the Chair (Appeal Officer) will usually be a member(s) of the Executive Leadership Team (ELT), supported by HR.

At the meeting:

- The Chair (Appeal Officer) will remind parties of the reason for the meeting.
- Introductions will be made and an overview of how the meeting will be conducted will be given.
- We may arrange for an additional person to make a written/record of the meeting – see Section 5.4.
- You will be asked to provide an opening statement and present your reasons for appeal. You may be asked questions by the Chair, HR or Manager (or Head of Service where your appeal is against dismissal).
- The manager (or Head of Service, for appeals against dismissal) will be asked to present their response.
- All parties will be given the time and opportunity to ask questions and respond to the concerns raised.
- Either party may request an adjournment of the hearing at any stage.
- Both parties will be able to re-examine any evidence before they proceed to give their final statements.

Appeals Officer(s) considerations / questions may include, for example:

- How long you have been in your current role.
- Any previous roles with the Council.
- How long your performance has been a concern and when you were informed.
- An assessment of the reasons given regarding your poor performance.
- Measures taken to support you to improve and how effective they were.
- Measures you have taken to improve and how effective they were.
- Whether you were given sufficient time given to correct the poor performance
- Warnings given that the poor performance could result in a warning, or dismissal.
- If different work was possible, whether it was reasonable to expect it to have been offered.
- The type of evidence collected, who was consulted and whether there was anything that was not done as part of the process which could have been done.

- Whether there are fair grounds for believing you were incapable of performing at the necessary level

At the conclusion of the Appeal Hearing, the Chairperson will, if possible, advise you of the outcome, either on the day (following an adjournment to enable the Appeal Chair to consider their decision) or by letter; we will usually aim to do this within 10 calendar days of your appeal hearing. In any event the outcome will be confirmed in writing as soon as possible. The decision you receive on appeal is our final decision and there is no further right of appeal.

Note that references to you (our employee) include the representative acting on your behalf.

8 Other relevant policies

The following internal policies contain additional information and guidance:

- Disciplinary Policy
- Absence Management Policy
- Grievance Policy
- Stress at Work

9 Administration of the Capability - Performance Management Policy & Procedure

HR is responsible for the administration of this policy. Should you have any feedback, please contact hr@great-yarmouth.gov.uk

10 Data Protection

The Council processes any personal data collected during performance management in accordance with its Data Protection Policy. Any data collected is held securely and accessed by, and disclosed to, individuals only for the purposes of managing performance. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the Council's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the disciplinary procedure.

CABINET



URN:	URN 23-198
Report Title:	Great Yarmouth Borough-Wide Design Code Supplementary Planning Document – Formal Adoption of the above SPD
Report to:	Executive Leadership Team Cabinet
Date of meeting:	29 January 2024 (Cabinet)
Responsible Cabinet Member:	Daniel Candon
Responsible Director / Officer:	Natasha Hayes, Executive Director – Place Kim Balls, Principal Strategic Planner
Is this a Key decision?	Yes
Date added to Forward Plan of Key Decisions if a Key Decision:	15 November 2023

EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

This report sets out recommendations to adopt the Great Yarmouth Design Code Supplementary Planning Document (SPD). Design codes enable Local Planning Authorities to provide clear guidelines on what is expected in the Borough in terms of design and visually pleasing neighbourhoods, enhancing community pride, and fostering a sense of place.

The Design Code will aid greater detail and interpretation of design policies in the adopted Local Plan and will be a material consideration in the determination of planning applications.

RECOMMENDATIONS:

That Cabinet:

1. Adopts the Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (as included in Appendix 1 of this report).
2. Delegates authority to Head of Planning to publish and republish the SPD, without any material alteration to content, in the most suitable format (for example HTML or PDF) to allow for the guidance to be easily accessed and navigated via the Council's website.

1. Introduction

- 1.1. The National Planning Policy Framework sets an expectation that all Local Planning Authorities should prepare local design guides or design codes. These are planning tools to help shape placemaking and design, setting out clear principles and standards for developments. In meeting this expectation, the Council has committed to progress a borough-wide design code within its Annual Action Plan.
- 1.2. Design codes can either form part of a development plan or be prepared as a Supplementary Planning Document (SPD) to aid greater detail and interpretation to adopted design policies within a development plan. The Great Yarmouth Design Code (SPD) falls within the latter and has been under preparation since September 2022, supported by appointed design consultants HAT Projects.
- 1.3. From November 2023, the Levelling-Up and Regeneration Act 2023 sets a requirement for all Local Planning Authorities to have a design code in place covering their entire area through their Local Plan or a Supplementary Plan when next reviewed. It is expected that the main principles of the Great Yarmouth Design Code will be largely incorporated into the new Local Plan, which is currently under preparation.

2. Great Yarmouth Design Code SPD for adoption

- 2.1. The purpose of the Great Yarmouth Borough-Wide Design Code SPD is to supplement the interpretation of existing design-based policies in the Council's adopted Local Plan, providing greater detail and expectations for what constitutes 'good design' across the borough.
- 2.2. This guidance is necessary to ensure local environments are designed to be of a high quality, promote healthy and active lifestyles, and are more resilient to changing climate. It is expected that the Design Code will help raise the standard of design which will in turn help improve perceptions of the area, stimulate the housing market, and increase the number of good quality new homes.
- 2.3. The SPD will apply to all scales and forms of development within the borough (aside from new industrial/warehousing/business development within the South Denes and Beacon Park Enterprise Zones, where separate design codes already guide such development in the existing Local Development Orders) including householder applications, small sites, major developments, and regeneration sites.
- 2.4. The SPD is structured into the following five parts:
 - **Introduction:** discussing the scope, purpose and status of the design code. This includes setting out how the design code has been prepared, how it should be used and why it is important and beneficial for both the public, developers and the Council.
 - **About Great Yarmouth:** providing a broad overview of the borough's distinctive landscape, built character and local building materials, and signposting users of the design code to further detailed sources character analysis and context.
 - **Borough wide design requirements:** summarising the types of design standards that apply across the whole borough, where relevant to the type of development. These have been organised thematically and are aligned with the structure of the National Model Design Code, which is familiar to the development industry.

- **Area specific design requirements:** sets out the design requirements and priorities which apply to different character areas (e.g. Great Yarmouth within the town wall or seafront, Gorleston historic town centre etc) and character types (e.g. historic village centres, inter-war/post-war housing estates, terraced streets & squares etc) across the borough.
 - **Development type design requirements:** sets out the design requirements that are specific to different types of development proposals (e.g. new residential developments, infill/redevelopment, new commercial or holiday park development etc).
- 2.5. The above structure has been developed to allow the public, developers and planning agents to readily identify and apply the code requirements applicable to specific proposals when preparing or commenting on a planning application. The structure will also benefit the Council's own planning officers and Development Control Committee in their decision-making of development proposals.
- 2.6. Examples of Design Codes produced by other LPAs include HTML versions that allow for them to be published on the Council's website in accordance with our accessibility standards, and allows for more easy navigation through the sections. Delegated authority is requested to publish and re-publish the SPD (without any material alteration to content) in whichever file format best supports its utility to users.
- 2.7. Within the SPD design requirements are set out for specific types of development proposal. These are categorised as: 'Required'; 'Expected'; and 'Best Practice'. These seek to provide additional detail on how to comply with the policies set out in the Local Plan. They do not introduce new policy, but provide a practical guide to what would be considered to constitute policy compliance.
- 2.8. For any planning decision, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal and in some cases, applicants may demonstrate that it would be unfeasible or unviable to be fully policy compliant in every detail. However, the onus is on applicants to justify their approach in these cases.
- 2.9. These best practice elements go above and beyond mandatory requirements and policy. They are included with the hope that applicants will take the opportunity to use these recommendations to improve their proposals, in order to sustain, enhance and improve the distinctive character of Great Yarmouth.

3. Consultation

- 3.1. The Town and Country Planning (Local Planning) Regulations 2012 require two stages of consultation during the preparation of a Supplementary Planning Document.
- 3.2. The Great Yarmouth Design Code SPD was subject to continuous 'informal' consultation with specific interest groups and stakeholders between September 2022 and May 2023 to inform a final 'draft' of the Design Code. Consultation on the final draft SPD was undertaken for an initial 8 weeks between 14th July and 8th September 2023. This consultation was extended by a further 4 weeks, ending on 13th October 2023.
- 3.3. All consultation responses have been reviewed, and final necessary changes made to the document. Subject to endorsement by Cabinet, the Great Yarmouth Design Code SPD can be adopted to support the Local Plan.

4. Consideration of public consultation responses

- 4.1. Through the final draft consultation, the Great Yarmouth Design Code SPD received responses from 29 individual/organisations, generating approximately 200 specific representations on matters throughout the document. A Consultation Statement is attached to this report (Appendix 2) setting out what comments were made and how they have been addressed through the final version of the Great Yarmouth Design Code (attached in Appendix 1 of this report).
- 4.2. This covering report is also supported by a schedule of modifications (in Appendix 3) which details all the changes that have been made between the consultation draft and the final version. In summary, the main changes made to the final Design Code have included:
- i) Amending the introductory section to make it clearer how the 'required' and 'expected' code standards should be applied and considered and in what circumstances proposals can depart from required and expected standards, for example by justifying an alternative approach to achieving the desired outcome.
 - ii) Including additional wording in the introductory section to make it clear that the Design Code has been prepared in a positive manner with oversight of a steering group of key stakeholders including the Highways Authority, Lead Local Flood Authority, Historic England and Norfolk County Council's Natural Environment Team.
 - iii) Adding further detail on local material palettes, commonly found within the Borough.
 - iv) Amendments to several 'required' and 'expected' code standards for greater clarity on their interpretation and consistency with adopted policies and standards.
 - v) Amending several criterions within Section 4.1 'Addressing Climate Change and Conserving Resources' from 'expected' to 'best practice' standards due to weaker links with existing adopted policy. This included amending the use of air source/ground source heat pumps to 'best practice' only and removing the requirement entirely that 'no gas connections should be provided to new development'.
 - vi) Amending a small number of criterions within Section 4.3 'Streets, movement and parking' and Section 4.6 'Building Design' from 'required' to 'expected' standards, or from 'expected' to 'best practice' standards, similarly due to some weaker links with existing adopted policy.
 - vii) References to limiting the use of uPVC with respect to windows, doors, fascias and cladding has also been removed from the 'borough-wide' and 'area-specific' design requirements.
 - viii) Referencing additional relevant technical guidance and standards within the 'Useful Resources' sections of the Design Code throughout as recommended by several statutory consultees.
 - ix) Amending references to Conservation Area Appraisals throughout the SPD to reflect their 'emerging' status and in the process of being prepared.
 - x) Correcting minor typographical and grammatical errors throughout the SPD.

- 4.3. Representations were received by Natural England in respect of the Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Assessments, which were also subject to consultation. Natural England agreed with the conclusions of both screening assessments; therefore the Council can adopt both Screening Reports to meet the relevant SEA and HRA regulations.

5. Financial Implications

- 5.1. National Planning Practice Guidance is clear that the role of Supplementary Planning Documents is to build upon and provide more advice or guidance on policies in an adopted plan. As they cannot introduce new planning policies, they should not add unnecessarily to the financial burdens on development.
- 5.2. The Great Yarmouth Design Code SPD has been prepared within this context and is clear that all 'required' standards which need to be met are based upon national or local policy requirements. In the case of local policy requirements, these have already been tested through the Local Plan examination process and evidenced through a whole plan viability assessment. All 'expected' standards in the Design Code are recognised approaches to meet the design expectations of the policy requirements.
- 5.3. The requirements are not mandatory and can be balanced against other planning factors by the decision-maker. Applicants have the ability, if required, to justify an approach that diverges from the guidance within the SPD, this includes situations where it would render the development unviable.
- 5.4. For these reasons, the SPD provides necessary flexibility, and it is not considered that its implementation would unnecessarily add to the financial burden on development, nor inhibit well-designed schemes from coming forward.
- 5.5. The costs associated with the preparation of the Design Code have been resourced from within the Strategic Planning budget.

6. Risk Implications

- 6.1. The risks in producing the SPD are limited. Without the document in place, there is a risk that reliance upon the existing design-based policies in the Council's Local Plan (which are fairly broad and provide only limited detail) may lead to development expectations falling short of the high-quality design.
- 6.2. Impact on delivery of new housing and other developments if the requirements of the SPD increase development cost beyond what can be accommodated by local market conditions. When consulted the Developer and Agents Forum requested that the Design Code be tested for viability. This has not been done as the code does not introduce new policy. The existing policies have already been tested for viability at the plan making stage. The risk has further been mitigated through changes made to address specific concerns. For example, the separation distances in the Code have been reduced to ensure that development can be laid out at a suitable density to meet the policy requirement.

7. Legal Implications

- 7.1. The powers to prepare an SPD are outlined within the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) Regulations 2012 and have been fully complied with.

- 7.2. There is also a requirement to ensure compliance with the Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Regulations. Accordingly, the SPD has been ‘screened out’ as having no significant effects on both accounts.

8. Conclusion

- 8.1. The Great Yarmouth Design Code SPD supplements the interpretation of existing design-based policies in the Council’s adopted Local Plan, providing greater detail and expectations for what constitutes ‘good design’ across the borough, and will be a material consideration in the determination of such matters.
- 8.2. It is recommended that Cabinet adopts the Great Yarmouth Design Code Supplementary Planning Document included in Appendix 1.

8. Appendices

Appendix 1 – Great Yarmouth Design Code Supplementary Planning Document - Adoption Version

Appendix 2 – Consultation Statement

Appendix 3 – Schedule of Modifications to Final Great Yarmouth Design Code

Appendix 4 – Strategic Environmental Assessment Screening Report

Appendix 5 – Habitat Regulations Assessment Screening Report

Consultations	Comment
Monitoring Officer Consultation:	Through ELT on 13 th December and 10 th January 2024
Section 151 Officer Consultation:	Through ELT on 13 th December and 10 th January 2024
Existing Council Policies:	Local Plan Part 1 Core Strategy, Local Plan Part 2
Equality Issues/EQIA assessment:	No EqIA assessment undertaken. Not considered necessary as the Design Code SPD does not introduce, but adds further detail to, design-based policies in the adopted Local Plan which has already been subject of EqIA.



Great Yarmouth Design Code

Supplementary Planning
Document

Adopted January 2024

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1. Introduction

1.1 Scope and purpose of the Design Code

The Great Yarmouth Design Code is a tool to help shape great placemaking in the borough. It applies to all scales and forms of development within the borough (aside from areas where the Broads Authority is the Local Planning Authority), including householder applications, small sites, major developments, and regeneration sites.

It is a tool to assist in meeting the Strategic Objectives of the Adopted Local Plan¹, which include designing local environments to be high quality and more resilient to a changing climate; and enhancing the quality of the borough's building environment by improving the character of its townscapes and promoting local distinctiveness. The Design Code is intended to inspire higher standards of design across the borough, creating better places for generations to come. It is also intended to ensure more certainty, consistency and speed in the determination of planning applications at all scales, making the planning process more effective at delivering new development that meets the needs of the local area.

The Design Code is intended to set out clear principles and standards for how development should be designed in the borough, focusing on the priority aspects of design. It is a concise code that signposts users to other sources of regulation, guidance, assessment tools and best practice. It is not an exhaustive design manual for every detail and is not a substitute for commissioning suitably qualified and experienced professional designers and consultants to prepare proposals and the supporting technical information required.

The Design Code should be read in conjunction with the National Design Guide and the National Model Design Code, which give useful further guidance.

1.2 Status of the Design Code

The Great Yarmouth Design Code has been adopted as a Supplementary Planning Document and has material weight in the assessment of planning applications by the Borough Council as the Local Planning Authority, as well as in appeals. Following the passing of the Levelling Up and Regeneration Act 2023, the Design Code may be incorporated into the new Local Plan, or be adopted as a Supplementary Plan.

For areas where a Neighbourhood Plan has been made, this may include design policies and/or a neighbourhood design code. At the current time, a made Neighbourhood Plan will take precedence over this Design Code, should there be a conflict.

1.3 Who should use the Design Code

Users of the Design Code are all those involved with, and with an interest in, the development of the built environment in the borough. This includes and is not limited to:

- Planning officers
- Elected members and Planning Committee
- Statutory consultees

1 <https://www.great-yarmouth.gov.uk/articles/2489/Current-Local-Plan>

- Local interest groups
- Community members
- Parish Councils
- Property owners
- Architects and designers
- Developers
- Planning agents

1.4 Structure of the Design Code

The Design Code is structured in four parts:

About Great Yarmouth: this section summarises what is distinctive about the landscape and built character of the borough. It is intended as a broad overview which signposts users to more detailed sources of information and character analysis.

Borough wide design requirements: these summarise design standards that apply across the whole borough area, where relevant to the type of development. These are organised thematically and are aligned to the structure of the National Model Design Code.

Area specific design requirements: these set out the design requirements and priorities that apply to character areas and character types found in the borough. Character areas are geographically specific locations in the borough, while character types describe patterns of existing development or settlement types, that can be found in a range of locations.

Development type design requirements: these set out requirements that are specific to different types of development proposal.

Required, expected and best practice code elements

Within the SPD design requirements are set out for specific types of development proposal. These are categorised as: 'Required'; 'Expected'; and 'Best Practice'. These seek to provide additional detail on how to comply with the policies set out in the Local Plan. They do not introduce new policy, but provide a practical guide to what would be considered to constitute policy compliance.

Applicants will be expected to demonstrate that proposals are designed in compliance with the requirements set out. As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal and in some cases, applicants may demonstrate that it would be unfeasible, or unviable to be fully policy compliant in every detail, or that betterment can be achieved via a different approach. However, the onus is on applicants to justify their approach in these cases.

All 'required' standards are based on national or local policy requirements. All development should comply with these required standards, unless there are strong planning reasons to justify an alternative approach. These 'required' elements carry the most weight in the assessment of the planning balance.

All 'expected' standards are recognised approaches to meeting the expectations of policy. Other ways of demonstrating compliance may be acceptable, but will need to be assessed on a case by case basis.

The code also includes recommendations that are intended to assist applicants in preparing the best possible design proposals. These represent best practice above and beyond mandatory requirements and policy. We hope that applicants will take the opportunity to use these recommendations to improve their proposals, in order to sustain, enhance and improve the distinctive character of Great Yarmouth.

1.5 How to use the Design Code

Design Code users should use the design code to identify the code requirements that are applicable to the specific proposal under consideration. Not all code requirements will apply to all proposals. Follow the steps below to identify the relevant aspects of the code for your proposal:

- Identify relevant planning policy and existing guidance/SPDs that are relevant to the proposal
- Identify borough wide requirements that are relevant to the proposal (and refer to relevant standards)
- Identify which character area(s) are relevant to the site, and apply the design objectives for those area types
- Identify what type of development is being proposed, and apply the related design code requirements

1.6 How the Design Code has been developed

The Design Code has been developed through extensive consultation and engagement with statutory bodies, stakeholders and representatives of the local community, and in line with the National Model Design Code and National Design Guide. It follows the approach set out in national guidance to be locally specific and relevant in terms of the level of analysis and the focus of the Design Code.

A steering group including representatives from Norfolk County Council including Highways, the LLFA, and tree officers, along with Great Yarmouth Borough Council planning and conservation officers, and Historic England, have guided the process. The content of the design code reflects the input of these stakeholders and represents agreed approaches to designing high quality buildings, streets, spaces and developments of all kinds.

Engagement at the drafting stage took place with parish and ward councillors, applicants and agents from the development sector, the Great Yarmouth Civic Society, and other stakeholders including Natural England, the Environment Agency, and Active Norfolk. Full public and statutory consultation took place on the draft Design Code in 2023, following which amendments were made in response to comments received.

2. About Great Yarmouth

The borough of Great Yarmouth includes Great Yarmouth itself, the town of Gorleston-on-Sea on the other bank of the Yare, and the villages surrounding them to the north, west and south. The borough was formed in 1974, as a merger of the former county borough of Great Yarmouth, along with part of Blofield and Flegg Rural District, and also part of the Lothingland Rural District in East Suffolk. It is fringed by, and partly includes, the Broads and part of the borough falls within the area for which the Broads Authority is the Local Planning Authority (LPA).

2.1 Landscape character, coastal change and flood risk

The character of the borough derives from its landscape, underlying geology and human history which has significantly shaped the landscape as well as creating the distinctive built identity of its towns and villages. A range of documents should be consulted to understand the landscape context for development proposals in the borough, including:

- Landscape Character Assessment (2008)¹
- Settlement Fringe Landscape Sensitivity Study (2016)²

The borough includes a number of important landscape and green infrastructure designations. Aside from the Broads area, for which the Broads Authority is the LPA, these include:

- The Norfolk Coasts Area of Outstanding Natural Beauty (AONB)
- A number of Sites of Special Scientific Interest (SSSI)
- Local Wildlife Sites, Ancient Woodland and other designations.

The relevant policy and guidance should be consulted and followed for sites which lie within, or will affect, these designated areas.

The borough includes areas of coastline subject to change, as well as areas within both tidal and fluvial flood risk zones. Areas of the borough are also sensitive to surface water flooding. The following should be consulted to understand how coastal change and flood risk is present in the borough:

- Shoreline Management Plan (2012)³
- Surface Water Management Plan (2013)⁴
- Strategic Flood Risk Assessment Level 1 Report (2017)⁵

1 https://www.great-yarmouth.gov.uk/media/1236/Landscape-Character-Assessment/pdf/Landscape_Character_Assessment.pdf?m=635720551564970000

2 https://www.great-yarmouth.gov.uk/media/4673/Settlement-Fringe-Study-2016/pdf/Settlement_Fringe_Study_2016.pdf?m=637026942736470000

3 <https://www.great-yarmouth.gov.uk/article/9790/Shoreline-management-plan-2012>

4 https://www.great-yarmouth.gov.uk/media/1242/Surface-Water-Management-Plan/pdf/Surface_Water_Managment_Plan.pdf?m=637750991190230000

5 The full suite of Strategic Flood Risk Assessment Documents can be found on the Environmental Evidence webpage for the Great Yarmouth Local Plan, https://www.great-yarmouth.gov.uk/article/2506/Environmental-evidence#_content_

2.2 Historic development

The borough includes unique and distinctive settlements with a strong material character and pattern of development. The form and pattern of development in the borough is strongly shaped by coastal change and human shaping of landscape that continues today- from the man-made creation of the Broads as a source for peat, used as fuel, to the changing course of the rivers converging at Great Yarmouth, and the shaping of the harbour and port areas on the shingle bank to the south of the medieval town. Coastal erosion has brought villages that were previously more remote from the sea into near proximity, changing their character and economy.

Great Yarmouth, as the main town in the borough, developed in three distinct areas - the medieval town - for a short period, a more prosperous mercantile centre than Norwich - within the walls, the 19th century expansion as a seaside resort coupled with its continuing importance for fishing and fish processing, and the 20th century expansion with estate housing development after WW1 and continuing after WW2 and to the present day. Great Yarmouth Market is one of the largest historic market-places in Britain; a market is presumed to have existed at Great Yarmouth long before the granting of King John's charter of 18 March 1207-1208.

Until the 19th century, building was only permitted within the Medieval town walls. The limited space dictated that houses were built as closely together as possible, which led to the development of The Rows. Unique to Great Yarmouth, the Rows were a network of 145 very narrow streets which ran parallel to each other. They were so narrow that a special 'Troll Cart' was developed to transport goods along them. The Rows took up most of the land inside the town walls. At first both rich and poor people lived there together. The wealthier people gradually moved out, and their houses were divided up into smaller properties. This left a diverse range of architecture. Grand merchant houses stood next to tiny dwellings which were built back-to-back with the houses in the next row.

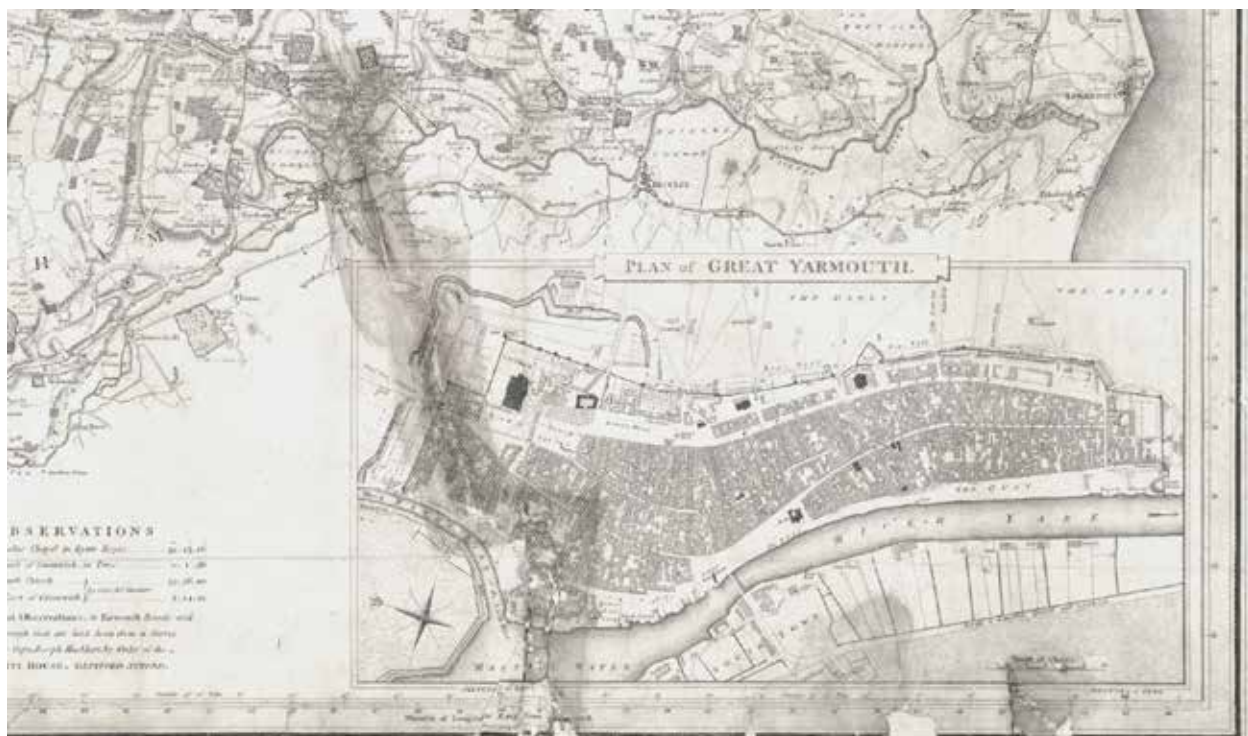


Fig. 1. Faden's map of 1797, showing the historic pattern of Rows and Plains inside the medieval walls of Great Yarmouth. The map can be further explored at <http://www.fadensmapofnorfolk.co.uk/>

Gorleston has its origins as a fishing village, then as a seaside resort which expanded substantially only in the 20th century. Due to the natural limitations on the growth of Great Yarmouth itself, due to the river and the sea, Gorleston's suburbs were developed to meet the need for a large amount of new housing after WW2, and growth continues to take place around it.

The villages have predominantly medieval origins, with fishing along the coast and agricultural estates inland. The 20th century also saw substantial growth around many villages in coastal locations with rail links bringing holiday-makers to the area, as well as from 'plotlands' on poor and marginal land along the coastal cliffs and dunes. Inland villages have seen little change or growth, apart from Bradwell, which developed substantially and is now part of the continuous urban area of Gorleston, and Caister and Belton, both of which have seen significant housing development through the postwar period to the present day.

2.3 Local building materials

Flint is the most common historic building material due to being naturally found in the borough, unlike other forms of building stone. Due to a lack of timber on the Breckland sand and gravel plain, which is the predominant underlying geology of the area, medieval timber-framed buildings are relatively rare compared to other parts of East Anglia, but some later timber-framed and timber-clad vernacular buildings are found in villages and the rural area.

With red brick, flint is the most prevalent cladding material found in pre-20th century buildings across the borough. A wide variety of flintwork techniques, including knapped, galleting and flushwork, can be found across the borough. Local brickworks produced mainly a soft orange-red brick, and, with the use of flint, this creates the distinctive material character of most of the older parts of Great Yarmouth's settlements. Later brickwork included ornamental moulded and decorative bricks which were often also made locally. Brick and flint were frequently combined with brickwork used to create corners and openings for windows and doors, and flint used to infill.

Painted brick, and render, is not as commonly seen today as exposed brick or flint, due in part to the erosion of historic lime renders, but was relatively frequently used. Historically, many brick and/or flint buildings would have been rendered - unless decorative flint or brickwork was meant to be exposed - to protect the rubble core of the flint walls as well as the soft Norfolk brick. Painted and rendered elevations are mostly found on some, mostly smaller, historic timber-framed buildings and small-scale brick buildings particularly in High Street locations. Painted façades can also be found on brick buildings which were overpainted or rendered in the late 18th and 19th century as part of restyling them to a more neoclassical appearance and this was often applied only to frontages.

In many locations the choice of paint as a finish was determined by weathering characteristics, with black tar paint on north- or west-facing elevations due to the prevailing wind exposure and risk of damp, or seaward elevations in coastal locations, as a protective coating. South- and street-facing elevations were typically limewashed in white or other colours which were determined through locally available natural pigments

Timber weatherboarding can be found in rural areas, particularly on agricultural buildings, but is relatively infrequent, and has since the 19th century been typically painted with tar for improved weathering in the same way as the painting of brick buildings, with limewash - both white and coloured - on less exposed elevations. Pantiled roofs - which have a

Dutch origin - are typical for vernacular buildings, in both red and black glazed forms, while reed thatch was highly prevalent historically, due to the Broads reedbeds, but was largely replaced with hard roof coverings during the 19th and 20th centuries. Plain tile also found, and slate became common after the coming of the railways meant that importing Welsh slate became economic.

2.4 Heritage designations and assets

The borough includes a wide range of heritage assets, many of national significance. The borough includes 431 listed buildings, 9 are considered to be at risk, 14 Scheduled Ancient Monuments and 18 Conservation Areas. These heritage assets can be enhanced by development within their settings, but can also be harmed by inappropriate design.

These are highlighted, where relevant, in character area descriptions and the relevant guidance and information should be consulted such as the Historic England listing entry, for listed buildings, scheduled ancient monuments and historic parks and gardens.

Conservation Area Appraisals are in the process of being prepared for the borough's Conservation Areas. When published and/or adopted, these should also be considered as part of the informing process for future planning applications within those specific areas.

Heritage resources should be consulted as part of understanding the context and local identity of sites for development proposals affecting designated heritage assets. These include:

- Norfolk Historic Environment Record⁶ and the Norfolk Heritage Explorer⁷
- Norfolk Record Office⁸

There is also substantial and important archaeology below ground in the borough, and Norfolk County Council's archaeological team may be consulted as part of the planning process.

6 <https://www.norfolk.gov.uk/libraries-local-history-and-archives/archaeology-and-historic-environment/historic-environment-record>

7 <https://www.heritage.norfolk.gov.uk/>

8 <https://www.archives.norfolk.gov.uk/> Page 78 of 666



Fig. 2. Snapshots of Great Yarmouth's distinctive landscapes

Top: Views looking south and north along the river Yare from the centre of Great Yarmouth.

Second row: The Gorleston-on-sea river frontage, and the town centre seen from the seafront

Third row: The village green at Martham, and the wide landscapes of the rural parts of the borough

Bottom: The old fishing village of Caister-on-Sea and the plotlands on the clifftop at Scratby.



Fig. 3. Examples of typical building materials and details for the Great Yarmouth area.

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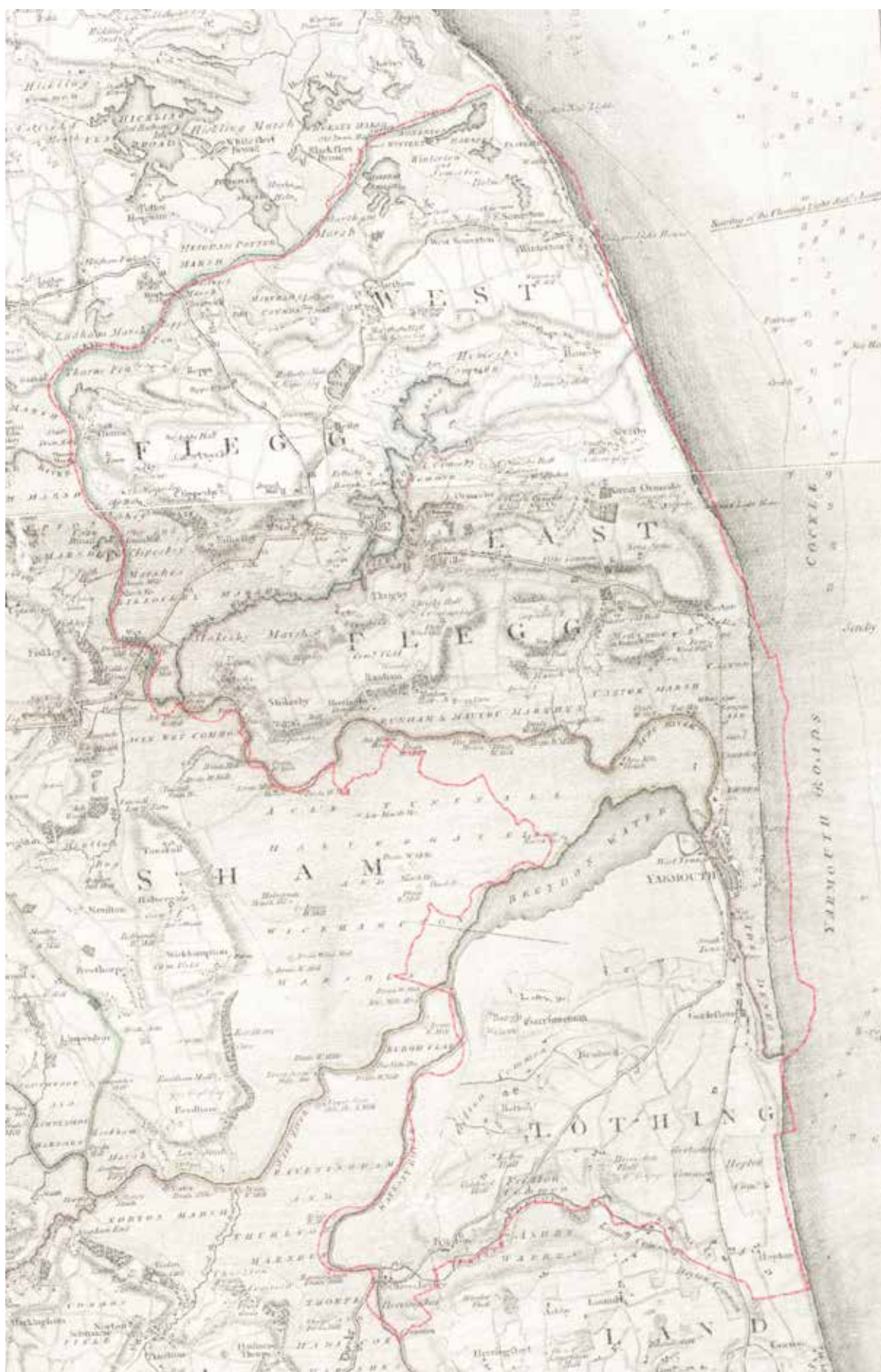


Fig. 4. 1797 Faden map, current boundary of Great Yarmouth borough indicated in red. The map can be further explored at <http://www.fadensmapofnorfolk.co.uk/>

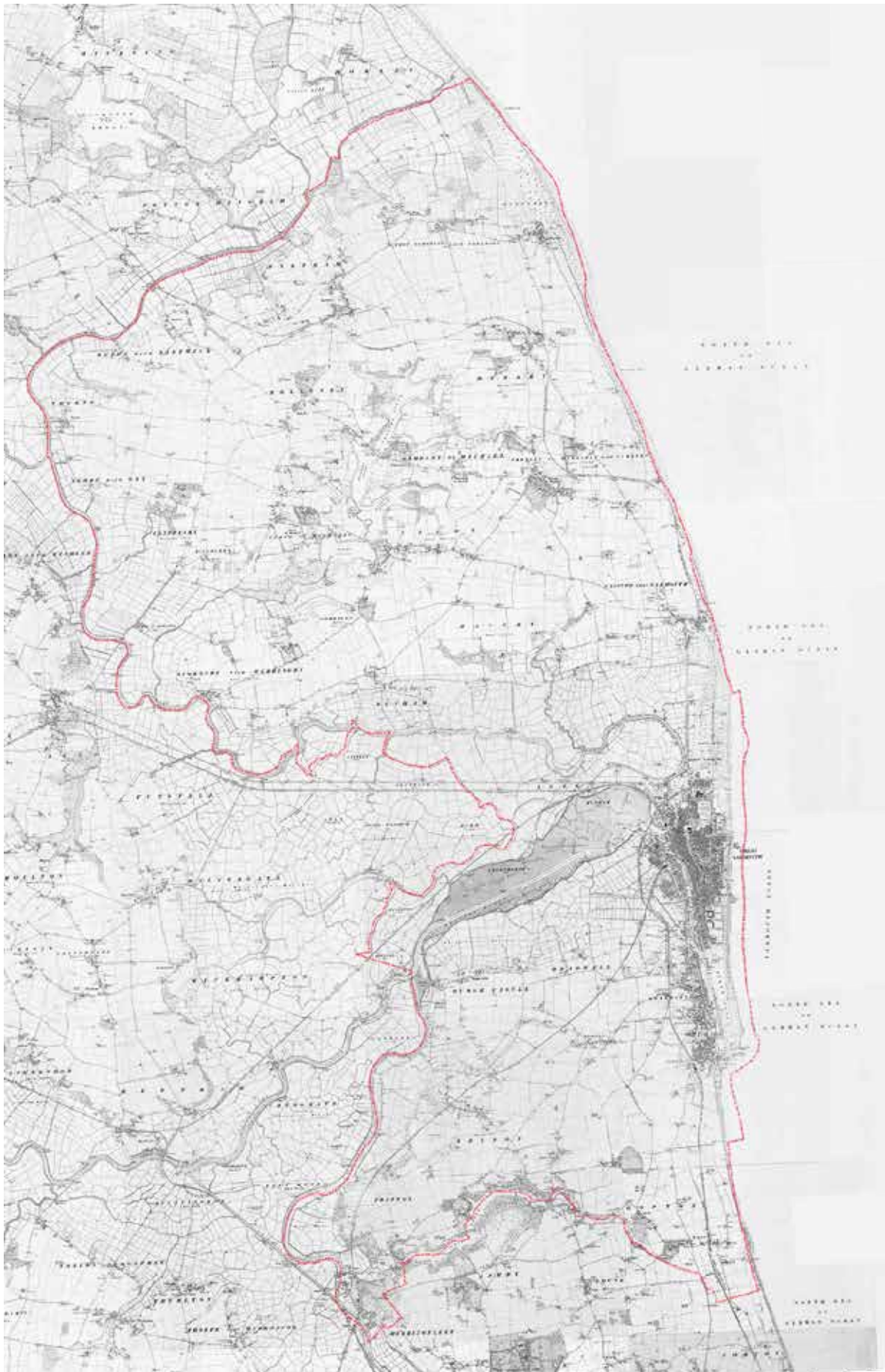


Fig. 5. Ordnance Survey map from 1888. This map can be further explored via the National Library of Scotland website, <https://maps.nls.uk/>

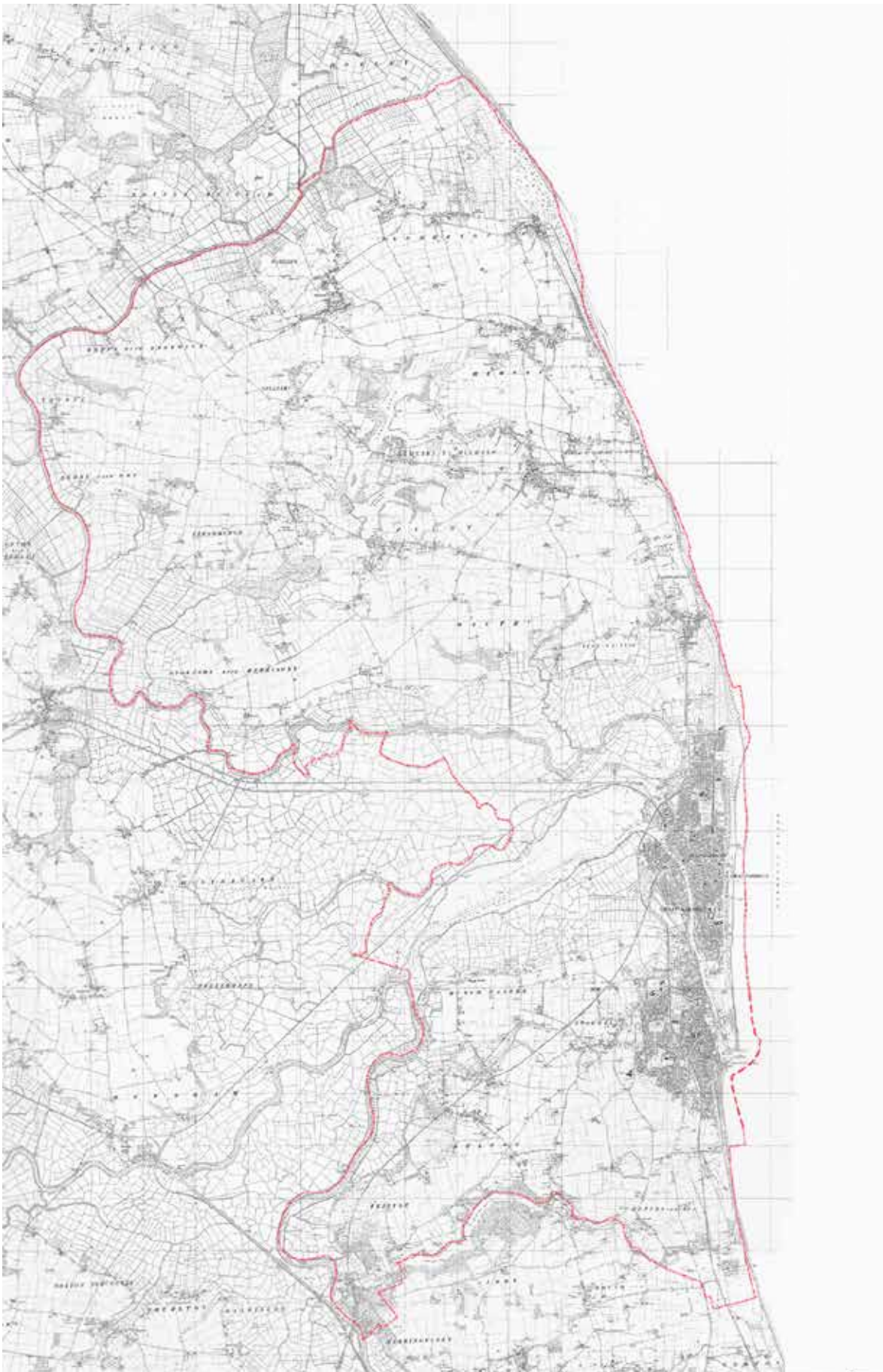


Fig. 6. Ordnance Survey map from 1949. This map can be further explored via the National Library of Scotland website, <https://maps.nls.uk/>

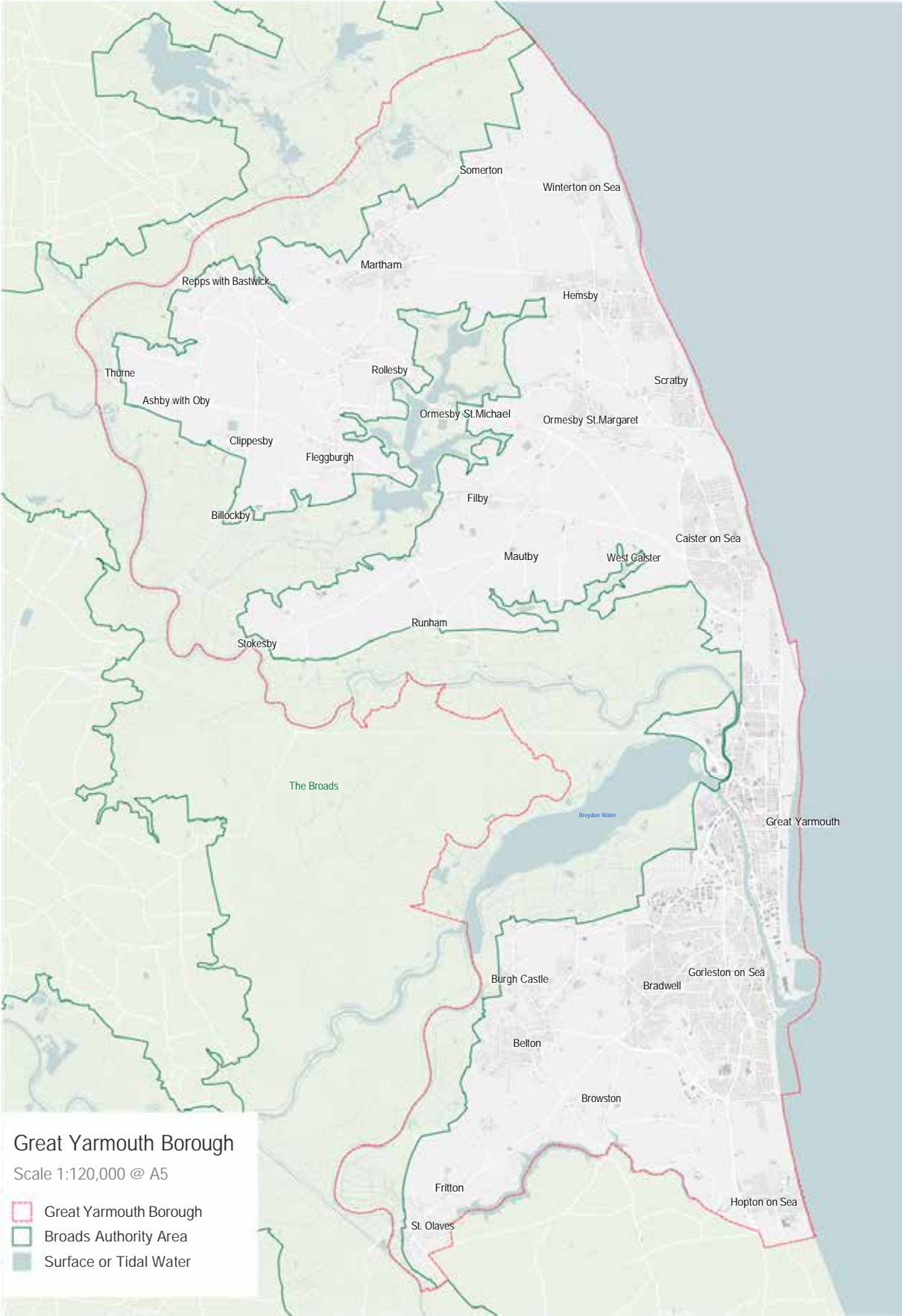


Fig. 7. Map of Great Yarmouth borough, 2023

3. Design vision for Great Yarmouth

3.1 Design vision

The Adopted Local Plan sets out clear objectives for the development of Great Yarmouth. These have been consolidated into a design vision for the borough, which underpins this design code.

The development of Great Yarmouth must:

- Protect and enhance the distinctive built and landscape character of the settlements in the borough
- Ensure new developments are of a quality that will be enduring and can become the civic heritage of the future.
- Be resilient to a changing climate and minimise carbon emissions and waste, including through reducing car use
- Be designed for the lifestyles, technology and needs of the present and the future, including supporting health and wellbeing, while complementing the heritage and landscapes of the borough.

Why is it design important?

The National Planning Policy Framework paragraph 126 states that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

Good design creates real benefits for communities - increasing pride in place, making healthier, safer environments, creating economic benefit and lowering carbon emissions. Conversely, poor design results in tangible harm.

Poor design creates environments that are not attractive to live in, work in, or to visit. This causes harm to local pride in place and erodes the distinctive identity of our built heritage and landscapes. It also erodes prospects for economic growth as liveable, attractive environments are an important factor in attracting and retaining businesses and residents.

Buildings and spaces that are poorly designed not only use more energy, and are responsible for more carbon emissions, than well-designed spaces; they can have a shorter lifespan and require demolition or substantial redevelopment within decades, rather than the centuries that our best-loved places have survived. This wastes the embodied carbon ‘locked into’ their building fabric.

Poor design can also lead to increased maintenance and long-term management costs, as well as the indirect costs from ill-health caused by inactive lifestyles, poorly designed and constructed building fabric or overheating; from the need to police poorly laid out spaces without natural surveillance; and from many other causes.

Well-designed, distinctive places with a strong and positive character make better environments for all parts of our community. Creating and enhancing the quality of our environment is central to the vision of our adopted and emerging Local Plans.

4. Borough wide design requirements

4.1 Addressing climate change and conserving resources

Climate change is the biggest challenge we face and it is a strategic priority for all development proposals to address this challenge through mitigation and adaptation.

Mitigating climate change means reducing greenhouse gas emissions, to slow down the rate of global warming and achieve the national commitment to reaching net zero carbon emissions by 2050. For development, this should be achieved by implementing the following measures:

- Minimising energy demand by building users through their behaviour, including travel mode choices
- Maximising energy efficiency of building fabric and systems
- Integrating renewable energy generation
- Minimising the carbon emissions resulting from construction

Adapting to climate change means designing development so that it is adapted to the changing climate, in particular hotter summers, wetter winters, and increased risks of surface water and tidal flooding. Climate adapted design must be achieved without resulting in increased emissions, for example from using air-conditioning to avoid overheating.

CC1: Ensure walking, cycling and public transport are the natural modes of travel for all users.

Expected	<p>Design site layouts so that walking and cycling routes to all destinations are more direct than routes for motor vehicles.</p> <p>Minimise the walking distance from front doors to public transport nodes through site layouts that incorporate direct walking routes.</p> <p>Ensure all development is as accessible as possible by public transport, by clustering development around existing or proposed public transport routes and increasing the density of development around public transport nodes.</p> <p>Ensure the quantity and location of cycle parking and storage is more easily accessible than car parking and storage.</p>
Policy links	<p>CS1: Focusing on a sustainable future</p> <p>CS9: Encouraging well-designed, distinctive places</p> <p>CS16: Improving accessibility and transport</p>

Why is reducing vehicle use so important, and how can design help?

Evidence shows that the transport habits of residents contribute far more to the overall carbon emissions resulting from new development, than the use of energy to heat, light and power the home, or the carbon generated by its construction. It is therefore important that designs for new developments help encourage a shift to lower-carbon lifestyles as far as possible.

Making walking and cycling easier does not mean that people who need to use a car, either regularly or occasionally, will be stopped from doing so. Parking for disabled residents, for example must still be provided at the doorstep. It just means making it more convenient for other residents to walk, cycle and use public transport as much as they can.

Locating development in places that are easily accessible by walking, cycling and public transport helps reduce car use, but residents' habits are a big factor. Residents will choose to use their car, even for very short journeys that could be made by walking or cycling, if it is more convenient.

If walking and cycling routes are shorter than routes for cars; and if cycles can be stored more safely, quickly and conveniently than cars, people do change their everyday habits. Even partial changes in habits can have a big impact on carbon emissions.

The shift to electric vehicles is not currently likely to reduce carbon emissions resulting from car use quickly enough to reach the country's net zero target. There will still be 'legacy' petrol and diesel vehicles on the road for decades. Current data shows vehicle use increasing, not decreasing, so even though some of this increase will be offset by the use of electric vehicles, forecasts show that in most scenarios, carbon emissions from transport will only fall by around 40% between 2022 and 2050.

It is therefore important that new development is designed to encourage as much behavioural change as possible. Changing designs for developments in order to create behavioural change does not cost the resident, the developer or the public sector anything. In fact it reduces costs for residents due to allowing them to reduce their car use without sacrificing convenience, it improves development viability by using less land for parking through more efficient parking layouts, and it reduces the costs to the public sector of ill-health, air pollution and congestion.



Fig. 8. Left: At Marmalade Lane, Cambridge, car parking is located in an unallocated shared parking area at the edge of the site and far from front doors, while cycle storage and parking is close to homes. Right: At Gt Kneighton, Cambridge, walking and cycling routes provide short cuts making it easier and quicker to walk or cycle to shops, school, friends and other local destinations.

CC2: Minimise active heating and cooling requirements through passive design

Expected	<p>Use simple building forms and massing as these are more energy efficient than complex forms.</p> <p>Design internal layouts and storey heights to maximise thermal efficiency and natural cross-ventilation.</p> <p>Do not include single-aspect homes due to the impossibility of cross-ventilation.</p> <p>Design south and west facing glazing to prevent overheating, and therefore the requirement for active cooling, through careful sizing and placement of glazing, integrating external shading devices which prevent summer overheating while allowing solar gains to heat spaces in winter.</p> <p>Ensure natural ventilation can be used as far as possible, and allows secure ventilation even when homes are unoccupied.</p>
Best practice	<p>Evidence compliance with Passive House standards</p> <p>Evidence compliance with a TM59 overheating assessment (for residential) or TM52 (for non-residential/mixed-use) buildings</p>
Policy links	<p>CS12: Utilising natural resources</p> <p>A2: Housing design principles</p>

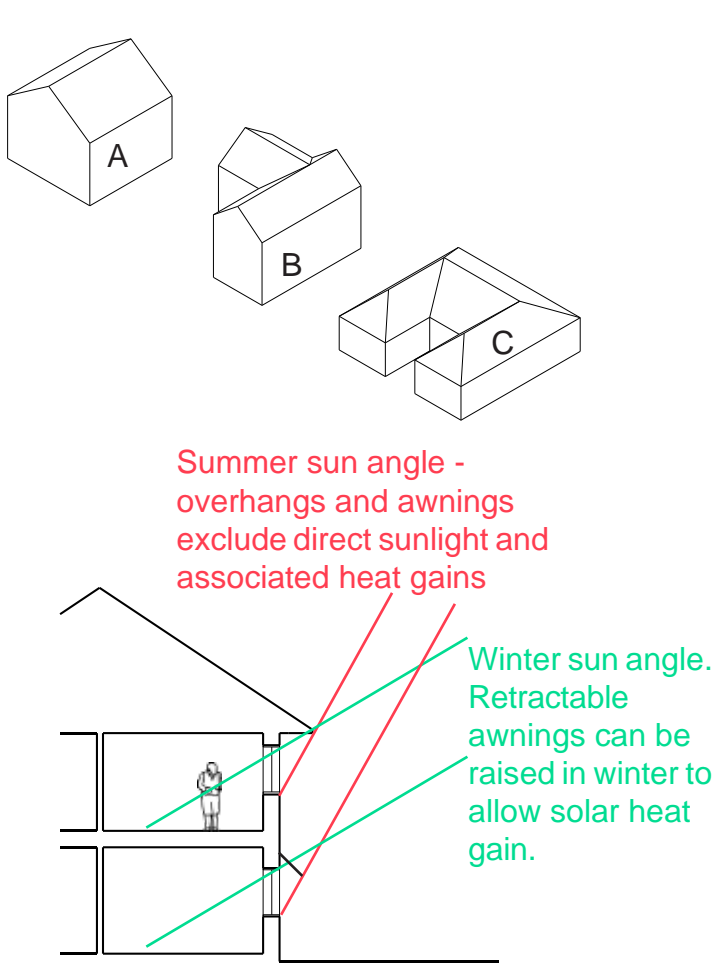


Fig. 9. Diagrams illustrating some of the principles of passive design.

Top: Building forms A, B and C have the same floor area but differing amounts of surface area. As a result, C has a heat loss of 17.5% more than A.

Bottom: Diagram showing how to design for passive solar heating in winter while avoiding summertime overheating. Diagram applies to south-facing glazing. Careful design of shading such as roof overhangs, awnings, brise-soleils or canopies will cut out the higher angle of sunlight from summer sun, while allowing winter sun to penetrate and heat spaces, reducing heating costs in winter.

External shading is far more effective at preventing overheating than internal blinds as it stops sunlight entering internal spaces and heating them up. It also allowing indirect daylight to enter so rooms do not become dark.

Floor-to-ceiling glazing on south-facing elevations contributes little to daylighting internal spaces. It can cause light pollution issues, and increase overheating unless shaded from direct sun. Raising sills makes overheating less likely.

CC3: Integrate on-site renewable energy generation and low and zero carbon heating, cooling and ventilation systems

Best practice	<p>Use air source or ground source heat pumps to provide heating where practicable.</p> <p>Include PV panels on south, east and west facing pitched roofs, and on flat roof areas.</p> <p>Include PV panel shelters over surface car parking spaces.</p> <p>Use mechanical ventilation with heat reclaim (MVHR) ventilation systems.</p> <p>Undertake operational energy assessment including predicted user-generated energy loads.</p>
Policy links	<p>CS12: Utilising natural resources</p> <p>A2: Housing design principles</p>

Using passive design and low-carbon technology

Passive design means using the building form to reduce the amount of energy needed to heat the building in winter, and to prevent overheating in summer. This results in lower running costs, lower carbon emissions, and more comfort for users.

The main principles of passive design are:

- Use simple shapes with a lower ratio of envelope (external wall/roof surface) to volume, because these lose and gain heat more slowly.
- Avoid large areas of south-facing glazing unless shaded to cut out summer sun
- Avoid large areas of west-facing glazing as it is difficult to shade effectively because the angle of west-facing sun is very low
- Design openings, and internal layouts, so that spaces can be naturally ventilated and cross-ventilated (openings on opposite sides of the building). Design openings so they can be left open without compromising security, and can be opened to varying degrees without being caught by the wind.

Passive design should be employed first, to reduce the need for active heating or cooling, before adding low- and zero-carbon technology. Additional technology all uses some energy, requires servicing and maintenance, and has a limited lifespan.

Heating uses far more energy than lighting and small power, so reducing carbon emissions from heating is very important.

The UK's electricity network is rapidly becoming entirely low-carbon, so using electricity to heat buildings does not involve high carbon emissions. Direct electric heating (such as electric panel heaters) is expensive to run, but air-source or ground-source heat pumps are energy efficient so should be used as the heat source where practicable. Solar thermal panels (which are different from PV panels, which only generate electricity) are also an effective way to provide zero-carbon hot water and heating.

PV (photovoltaic) panels on roofs can generate electricity but at a domestic scale, are not usually big enough to provide all of the home's needs, so grid electricity will still be used. If costs are tight, it is better to change the heat source to a low-carbon electrically powered system, such as an air source heat pump, than to install PV panels. Installing PV panels but using gas for heating is not a low-carbon approach.

CC4: Minimise potable water use

Required	Design new residential development, and holiday accommodation in buildings, to use 110 litres of potable water, per person per day, or less.
Expected	Integrate rainwater harvesting and greywater reuse to reduce potable water use in non-residential developments.
Best practice	Integrate rainwater harvesting and greywater reuse to reduce potable water use for residential developments. Design non-residential development to achieve full credits for category Wat 01 of BREEAM.
Policy links	E7: Water conservation in new dwellings and holiday accommodation

CC5: Reduce embodied carbon emissions resulting from construction

Best practice	Retain and reuse existing structures where this is the most carbon efficient option and the structure contributes, or can be suitably adapted, to the positive character of the local area. Undertake and submit an embodied carbon assessment
Policy links	SO6: Strategic Objective 6



Fig. 10. Retrofit of existing buildings saves carbon in the construction process, and through improving operational energy efficiency, while breathing new life into tired buildings.

Example: Hillington Square housing retrofit, Kings Lynn, designed by Mae Architects. This project retrofitted social housing built in the late 1960s to make it more energy efficient, repurpose unused and unattractive ground floor garage space, adding new balconies and replacing raised walkways with internal lift and stair cores.

CC6: Ensure development is flood safe and flood resilient

Required	<p>Design within Flood Zones 2 and 3 to comply with Environment Agency requirements regarding height of floor levels for habitable rooms, refuge and evacuation, and flood resilient construction, while ensuring active frontages and accessible accommodation (refer to BD1 and BD3 for further guidance)</p> <p>Ensure development does not increase the risk of flooding on adjacent sites, through use of SuDS (refer to CC7 for further guidance)</p>
Expected	Comply with LLFA guidance for flood safety and resilience.
Best practice	Use salt tolerant materials and construction below the flood datum, in areas at risk of tidal flooding.
Policy links	CS13: Protecting areas at risk of flooding and/or coastal change

CC7: Reduce the risk of surface water flooding on and around the site

Expected	<p>Apply the LLFA's Developer Guidance appropriately to all developments for surface water management.</p> <p>Meet surface water run-off rates required by the Lead Local Flood Authority (LLFA).</p> <p>Submit detailed design drawings of all proposed SuDS features to demonstrate compliance with the principles and standards set out in the CIRIA SuDS Manual.</p> <p>Maximise the amount of permeable and absorbent surfaces on the site.</p> <p>Use surface level SuDS systems rather than below ground attenuation tanks or storage.</p> <p>Locate and design SuDS to form part of the wider green infrastructure network, linking existing and future habitats.</p> <p>Integrate SuDS into the design of streets, public open spaces and parking as visually appealing features that contribute to creating distinctive character to development.</p> <p>Design SuDS to be multifunctional, for example as wildlife habitats, for formal or informal recreation, for parking, to support community educational learning, an/ord for rainwater/stormwater harvesting and reuse.</p> <p>Avoid fences around SuDS features such as ponds and watercourses, through design of gradients and depths, and use of natural planting as a barrier.</p> <p>Integrate SuDS into building design through including green, brown or blue roofs.</p> <p>Design SuDS to be low-maintenance. Where maintenance is required, integrate access and buffer zones into the wider landscape design.</p>
Policy links	CS12: Utilising natural resources



Fig. 11. Examples of successful SuDS integrated with a range of settings.

Top: SuDS within residential development is easier to maintain, more beneficial for biodiversity and more effective at managing surface water flows if designed to grow wild rather than being mown. Leiwen, Netherlands and St Andrews Park, Uxbridge

Middle: Rain gardens in urban settings can soften the landscape, provide attractive features, and help keep street trees watered. Sheffield and Derby

Bottom: Natural SuDS should be included in all landscaping, including business parks and out of town settings. Left: Image from Natural England GI Framework; Right: East Lothian

CC8: Reduce urban heat island effect

Best practice	<p>Minimise hard landscaping and maximise soft landscaping, including water surfaces.</p> <p>Shade hard landscaped spaces, streets and paths through tree planting and/or awnings and other adjustable shading devices.</p> <p>Use insulating and heat reflecting materials for both buildings and landscapes, including for roofs. These can include green and brown roofs and light coloured materials.</p>
Policy links	SO1: Strategic Objective 1

CC9: Minimise resource usage through future building maintenance, alterations and adaptation

Best practice	<p>Use materials that can be reused and recycled at end of life</p> <p>Design to minimise energy intensive maintenance requirements over the lifetime of the development.</p> <p>Design buildings to be adaptable to different uses without requiring demolition.</p> <p>Design short-life systems and materials –for example mechanical and electrical installations – to be replaceable without requiring substantial alterations to long-life building elements, such as structure and external envelope.</p>
Policy links	SO1: Strategic Objective 1

Reducing the urban heat island effect

The urban heat island effect occurs when hard landscaping, a lack of shading, and dark coloured materials absorb heat from the sun and increase temperatures in the area. A recent study showed that the Kilburn and South Hampstead area in London, with 38% vegetation cover, experienced heat over 7°C hotter than Regent's Park with 89% vegetation cover, just a short distance away.¹

Urban heat is a particular problem at night, due to materials like concrete and stone absorbing heat in the day then slowly releasing it at night. This prevents urban areas cooling down, intensifying heatwaves, and can cause stress and health issues and acutely impacts vulnerable citizens – including children and the elderly.

Vegetation cover and albedo are two of the most important factors which determine the strength of the urban heat island effect. Albedo describes how reflective a surface is. High albedo surfaces, such as white roofs, are reflective and absorb less heat than low albedo surfaces such as asphalt roads. Vegetation cools the air around it through the evaporation of water.

Spaces that are designed to maximise vegetation, shade and high albedo surfaces, can reduce the urban heat island effect and make built-up areas more comfortable, as well as reducing energy use on cooling internal spaces, and encouraging people to walk and cycle during hot weather.

1 Arup, Urban Heat Island Snapshot, 2023 - <https://www.arup.com/perspectives/publications/research/section/urban-heat-island>

Useful resources

- LETI has a wide range of free resources on low-carbon design, specification and procurement - <https://www.leti.uk/publications>
- The Passivhaus Trust has a wide range of free resources on low-carbon passive design - <https://www.passivhaustrust.org.uk/guidance.php>
- Good Homes Alliance Overheating in New Homes Tool and Guidance - <https://goodhomes.org.uk/overheating-in-new-homes>
- Prometheus weather data for Great Yarmouth can be downloaded free at <https://engineering.exeter.ac.uk/research/cee/research/prometheus/downloads/>
- The CIRIA SuDS Manual (C753) and the accompanying Guidance on the construction of SuDS (C768) are the definitive guide to design and maintenance of sustainable drainage systems (SuDS) and are available for download free at www.ciria.org
- Natural England guidance - Introduction to Freshwater Wetlands for Improving Water Quality - JP044 (<https://publications.naturalengland.org.uk/>)
- Norfolk County Council, as the LLFA, have guidance for developers at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

4.2 Context and identity

Well-designed development makes a positive contribution to its context, strengthening local distinctiveness and a sense of place. This is achieved through careful observation and analysis of the site’s setting at the start of the design process.

Copying all aspects of building form or styles from the site context is rarely an option due to contemporary requirements, such as space standards, fire and flood safety, energy efficiency, accommodating the private car, and other aspects of design. Good design harmonises with its context while developing its own distinctive character.

Further design code requirements regarding context and identity are found in the area specific design requirements. This section contains general code requirements and expectations that apply across all area types and forms of development.

CI1: Design with regard to local context, including the surrounding built environment, topography, landscape and drainage.

Required	Analyse the site context with regard to development form and pattern, landscape topography and character, heritage assets, green and blue spaces, underlying soils and geology, views to and from the site, and locally prevalent materials and building details, and submit analysis within Design & Access Statement. Ensure existing and proposed drawings, including 3D visualisations, show surrounding context accurately and to scale, including relevant adjacent phases of development or consented development by others.
Expected	Design site layout to complement the existing landscape and built environment, including the pattern of development, landscape and townscape. Design layout and massing so that existing significant views are retained and enhanced, and new publicly accessible views of significant natural and built assets are created.
Policy links	A2: Housing design principles CS9: Encouraging well-designed, distinctive places E5: Historic environment and heritage



Fig. 12. Great Yarmouth’s landscapes are characterised by long views over flat landscapes. Ensuring new development is well-integrated and screened,taking advantage of existing mature trees and hedges and incorporating new planting, means it integrates more successfully in the landscape.

CI2: Conserve and enhance the significance of heritage assets

Expected	<p>Retain non-listed buildings/structures which make a positive contribution to the significance of a conservation area, or are non-designated heritage assets, in line with policy E5.</p> <p>Design proposals to respect and enhance the settings of all relevant heritage assets, including creating and respecting publicly accessible framed views of heritage landmarks.</p> <p>Include appropriate interpretation of heritage sites within development proposals, including signage.</p>
Policy links	<p>CS10: Safeguarding local heritage assets</p> <p>E5: Historic environment and heritage</p>



Fig. 13. Examples of recent design that is sympathetic to the local context including heritage settings.

Top left: St George's Chapel pavilion in the heart of Great Yarmouth. Architect: Hopkins Architects

Top right: Hunsett Mill, Stalham, Norfolk. Architect: Acme

Bottom left: New wing at Brentwood School, Essex sits comfortably alongside historic buildings. Architect: Cottrell and Vermeulen.

Bottom right: Contemporary design using traditional materials within the heritage setting at Ely Museum. Architect: HAT Projects

CI3: Create a positive and distinctive sense of place for new development

Required	Develop a clear design approach for all development which will create, or reinforce, a distinctive and place-specific local identity. Use the Design & Access Statement to demonstrate how this has been achieved.
Expected	<p>Include distinctive, beautiful and unique features within major development. Features may include landmark buildings, high quality public art, public realm and landscaping, including SuDS.</p> <p>Create a range of character areas within large-scale housing developments which comprise significant extensions to existing settlements (such as those allocated by Policies CS18, GN1 and CA1) to achieve a clear design identity for each street or cluster. This should also be addressed at outline application stage as part of a masterplanned approach, and can be achieved through the use of different approaches to layout, house designs, or variation in materials and details.</p> <p>Include a range of house types on larger developments, with a clear design-led rationale for their usage and placement. Standard house types must not be used without being adapted to create a distinct local identity.</p> <p>Refer to development type requirements in 6.1.</p>
Policy links	CS9: Encouraging well-designed, distinctive places A2: Housing design principles



Fig. 14. Examples of large sites with clearly defined character to different parts of the development, achieved through careful masterplanning. Both developments show a legible and well-connected street layout using a broadly gridded arrangement.

Left: Great Kneighton, Cambridge showing areas with long, linear building forms (top) running perpendicular to streets, contrasting with terraced homes with gable ends facing the street, (middle) which articulate each dwelling, and terraces which have their eaves to street (bottom)

Right: New Hall, Harlow where a broadly perimeter block layout shows variation in design and materiality which is clearly visible from the air as well as on the ground. Each block is relatively uniform in itself, with repeated house types, but as a whole the development has variety.

CI4: Use external materials and detailing which complement the local context and are appropriate for the local climate

Expected	<p>Use materials and details which reflect the local vernacular, unless a clear design-led rationale is presented for an alternative approach. A description of the most commonly found materials in Great Yarmouth Borough can be found in chapter 2, and more detailed descriptions of materials in existing character areas can be found in chapter 5.</p> <p>In most locations, use a single primary material for external elevations with contrasting materials used for details and secondary features only.</p> <p>Use materials and details which are robust and suitable for the local climate, in particular in waterside and marine settings.</p> <p>Alterations and energy efficiency improvements should not obscure high quality existing external materials such as brick and flint work. Replacement windows, balcony metalwork and similar should be of similar quality as the existing.</p>
Policy links	CS9: Encouraging well-designed, distinctive places

Useful resources:

- National Model Design Code - <https://www.gov.uk/government/publications/national-model-design-code>
- National Design Guide - <https://www.gov.uk/government/publications/national-design-guide>
- Historic England's website has a wide range of resources on planning, design and the historic environment - <https://historicengland.org.uk/advice/find/a-z-publications/>
- CABI's guide Creating Successful Masterplans is, while dating from 2004, a highly useful and relevant guide to masterplanning large development sites - <https://webarchive.nationalarchives.gov.uk/ukgwa/20110118095356/http://www.cabi.org.uk/files/creating-successful-masterplans.pdf>



Fig. 15. New housing developments creating attractive places at a range of scales that successfully address the public realm and use materials relevant to the Great Yarmouth context.

Top: Tibby's Yard, Southwold uses typical Suffolk materials and colours, and attractive low brick walls as boundary treatments. Architect: Ash Sakula

Middle left: townhouses with integrated garages facing a well-landscaped public realm at Great Kneighton, Cambridge. Architect: Proctor Matthews.

Middle right: Molenplein, Den Helder, the Netherlands has a varied and informal streetscape creating high-density, low-rise development using simple materials. Architect: Tony Fretton

Bottom left: Traditional East Suffolk brick and pantile used with a very simple and efficient form, attractively composed, at Walberswick. Architect: Dow Jones.

Bottom right: detached homes with attached garages form an orderly mews-style development at Pewsey, Wiltshire. Architect: Tony Fretton

4.3 Streets, movement and parking

Successful places have an intuitive, safe and well-connected movement network that prioritises walking and cycling and the needs of vulnerable user groups, and minimises the impact of necessary vehicle movement. Streets and movement routes should be attractive, contributing to the distinctive sense of identity in new development and reinforcing the positive character of existing neighbourhoods.

General note: this section must be read in conjunction with Norfolk County Council’s Safe, Sustainable Development Aims and Guidance Notes¹. This sets out the aims, requirements and technical standards for the provision of new and altered highways infrastructure for all users, and indicates what will be acceptable to Norfolk County Council as the Local Highways Authority.

See also the code requirements in [4.4 Public open space, nature and water](#)

SM1: Create a walkable and integrated network of streets and pedestrian/cycle routes.

Required	Integrate all relevant strategic walking and cycling routes into site layouts and demonstrate through the Design & Access Statement submitted.
Expected	<p>Design major developments around a clear hierarchy of connected streets which are orientated to address key pedestrian desire lines, promote permeability and create a legible environment.</p> <p>Use site layouts to link existing streets, paths and cycle routes in the wider area, and to create new cycling and walking routes that connect local destinations and encourage active travel.</p> <p>Make connections and through routes to adjoining land and highways, to improve permeability and to avoid sterilising future sites for development.</p> <p>Avoid cul-de-sacs that do not include pedestrian and cycling rights of way forming through routes to the wider movement network. Cul-de-sacs and private drives are acceptable only as tertiary streets serving five homes or fewer.</p>
Policy links	<p>GSP7: Potential strategic cycling and pedestrian routes</p> <p>CS9: Encouraging well-designed, distinctive places</p> <p>A2: Housing design principles</p>

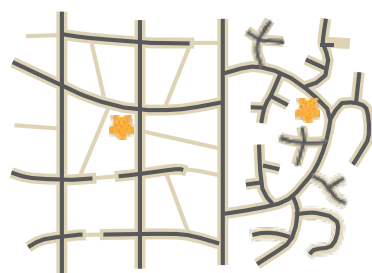


Fig. 16. Diagram showing different approaches to movement networks.

Left: integrated permeable movement network with pedestrian and cycle routes that follow direct desire lines to destinations while vehicle traffic is restricted.

Right: non-permeable movement network where pedestrian and cycle routes are not quicker or more direct than vehicle routes and do not follow desire lines to destinations.

¹ <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/highway-guidance-for-development/publications>

SM2: Design movement routes to clear and consistent standards which prioritise vulnerable users, children, pedestrians and cyclists.

Required	Design all movement routes to be safe and accessible to all members of the community and demonstrate through Design & Access Statement
Expected	<p>Consider the needs of all users, including physically disabled people, people with visual impairments, and neurodiverse people, in the design of streets and movement routes.</p> <p>Include separate cycle lanes on all new streets other than local and tertiary streets.</p> <p>Use design to passively slow vehicle movements, for example through narrowing the carriageway, choice of surface materials, trees and landscape features.</p> <p>Integrate high quality wayfinding features and signage, and lighting, into the design of movement routes.</p> <p>Apply the design principles and standards within Manual for Streets 1 and 2, LTN 1/20, NCC Safe and Sustainable Development Guide</p> <p>Follow the principles of the street design examples in figures 18-24, which show indicative acceptable approaches to new streets within new masterplanned development.</p>
Best practice	Accessibility audit and dedicated report
Policy links	CS9: Encouraging well-designed, distinctive places A2: Housing design principles



9. Street Hierarchy: A typical neighbourhood street hierarchy. All of these streets would include frontage access.



Primary street: Arterial, ring road or relief road with dedicated lanes for cycles and public transport, where possible.



High Street: Primary or Secondary street that acts as a focus for retail and other services.



Secondary Street: Mainly carry local traffic and provide access into neighbourhoods; they are often the location of schools and community facilities and may also be residential streets in themselves.



Local Street: Residential streets with managed traffic flows to prioritise active travel. They provide access to homes and support active travel, social interaction and health and wellbeing.



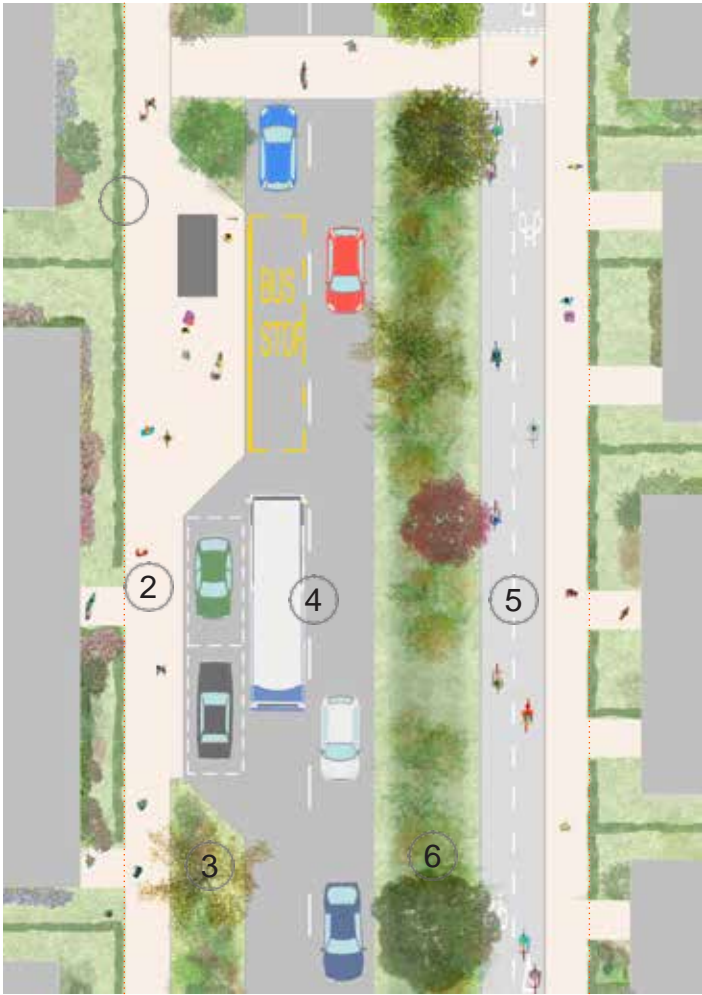
Tertiary street: These are used for servicing or for access to small groups or clusters of homes. They can be lanes, mews courts, alleyways or cul-de-sacs.

Multi-functional streets and other spaces:

High Streets and secondary streets are at the centre of public life and support a wide range of activity. They can prioritise pedestrian and cycle movement while making it easy to get to their edges and beyond by public transport.

Fig. 17. Diagram from the National Model Design Code illustrating the different levels in the street hierarchy.

Fig. 18. Example new primary street layout



Privately owned

Public realm (adopted/unadopted)

Privately owned

1. Hedge to front property boundary
2. Footway (minimum 2m wide)
3. SuDS with street trees, bus stops, visitor parking (swales or rain gardens linked with culverts under hard landscaped buildouts)
4. Two-way carriageway
5. Two-way fully segregated cycle track (min 3m wide)
6. Street tree species to reach 12m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level



Example: New Hall, Harlow

Fig. 19. Example new high street layout



Privately owned

Public realm
(adopted/unadopted)

Privately owned

1. Building line at rear of footway typically
2. Footway (minimum 2m wide) next to building line, to be kept unobstructed of outdoor seating, A-boards, signage, lighting columns
3. 2m wide area for outdoor seating, play on the way, cycle parking.
4. Fully segregated cycle track on both sides of street (each lane minimum 2m wide)
5. Multifunctional SuDS zone with street trees, bus stops, drop-off/delivery bays, blue badge parking. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
6. Two-way carriageway
7. Street tree species to reach 12m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level

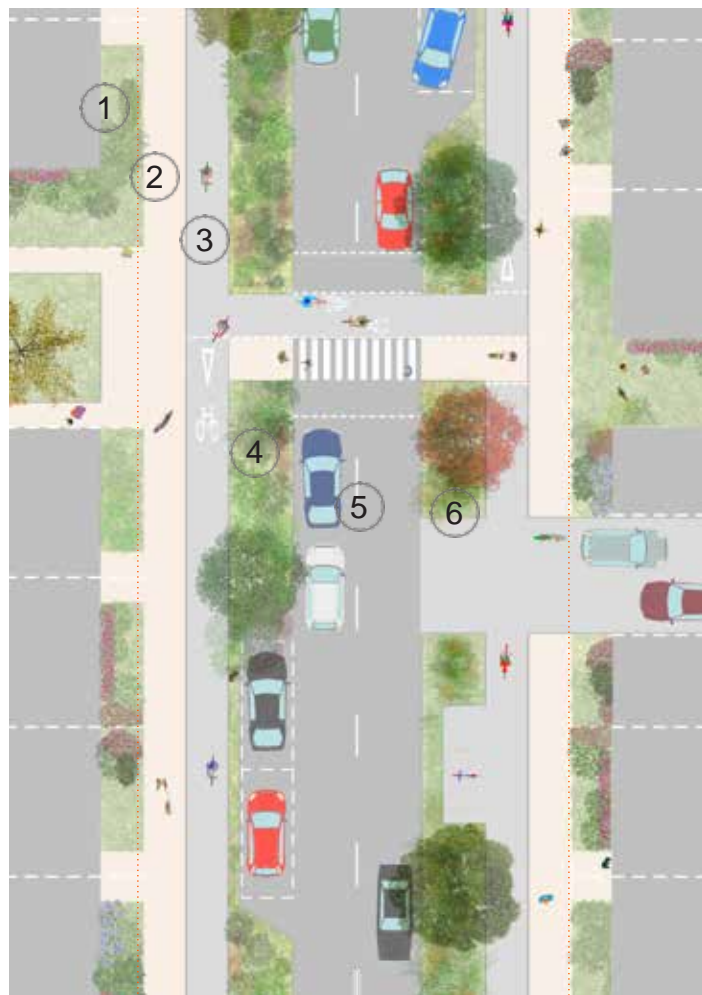


Examples of High Streets with cycle tracks, SuDS, trees and seating alongside necessary vehicle traffic.

Top: Eastcote High Street SuDS.

Bottom: Floating bus stop, Woolwich Road, London

Fig. 20. Example new secondary street layout with segregated cycleway both sides



Privately
owned

Public realm
(adopted/unadopted)

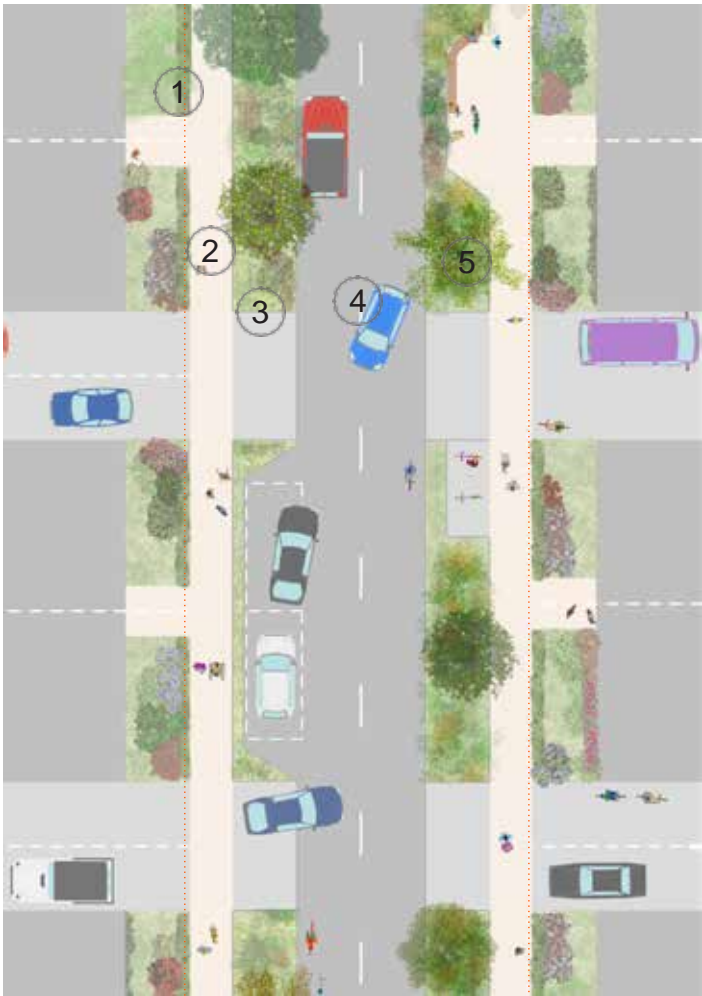
Privately
owned

1. Low level planting to front of plots
2. Footway (minimum 2m wide)
3. Fully segregated cycle track on both sides of street (each lane minimum 2m wide)
4. Multifunctional SuDS zone with street trees, visitor car and cycle parking, social seating areas. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
5. Two-way carriageway
6. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level

Example of secondary streets: generous footways separated from the carriageway by street trees provide a place for informal socialising at the doorstep at Eddington, Cambridge



Fig. 21. Example new secondary street layout with on-street cycling



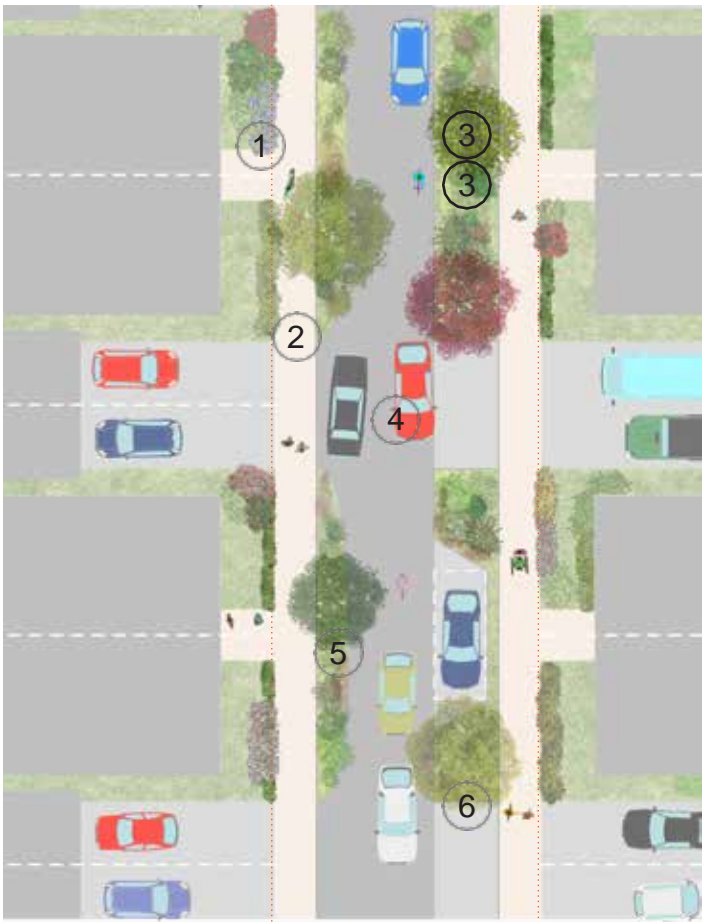
On-street cycling is only suitable for streets with a 20mph speed limit and under 2000 vehicle movements per day

- 1. Hedge or low level planting to front of plots
- 2. Footway (minimum 2m wide)
- 3. Multifunctional SuDS zone with street trees, visitor car and cycle parking, social seating areas. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
- 4. Two-way carriageway with on-street cycling
- 5. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level



Examples of secondary streets:
Top: Vauban, Freiburg
Bottom: Eddington, Cambridge

Fig. 22. Example new local street layout



Privately owned Public realm (adopted/unadopted) Privately owned

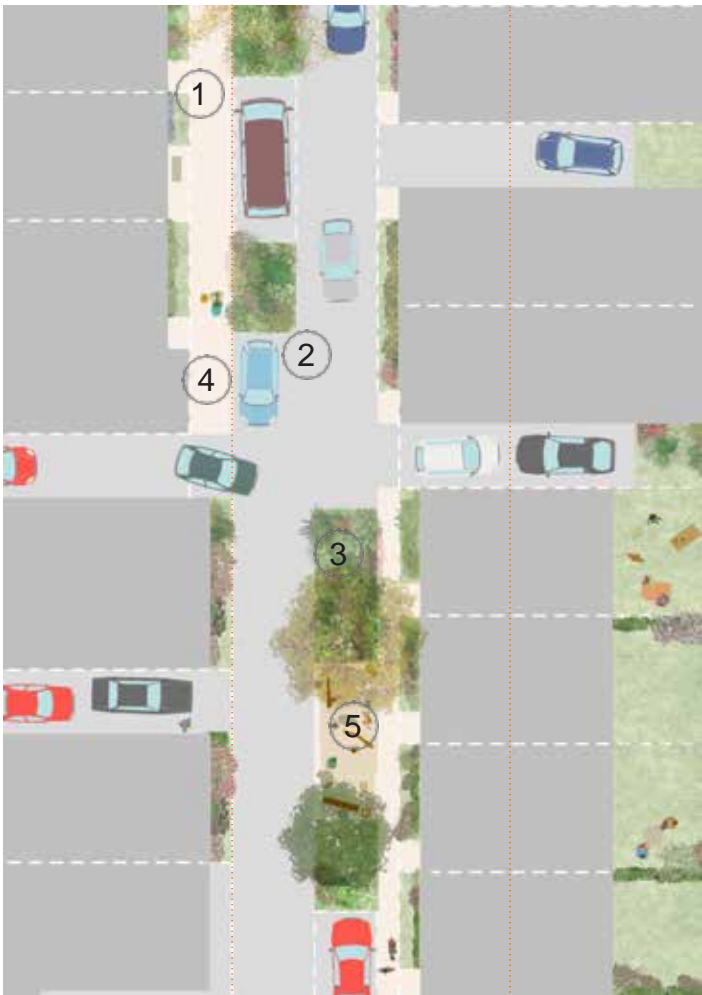
On-street cycling is only suitable for streets with a 20mph speed limit and under 2000 vehicle movements per day

1. Hedge or low level planting to front of plots
2. Footway (minimum 2m wide)
3. Multifunctional SuDS zone with street trees, visitor car and cycle parking, social seating areas. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
4. Two-way carriageway with on-street cycling
5. Build-outs with street trees to narrow carriageway, slow traffic and deter kerbside parking.
6. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level



Example of local residential streets at Great Kneighton, Cambridge

Fig. 23. Example new tertiary street layout (green mews type, shared space)



Privately owned Public realm (adopted/unadopted) Privately owned

Shared space layouts are only suitable for low-traffic streets with no through route for vehicles.

1. Low level wall, railings or low level planting to front of plots with little or no setback to building line
2. Shared space carriageway for walking, cycling and pedestrians designed to slow vehicle movements to walking speed
3. Multifunctional SuDS zone with street trees, visitor car and cycle parking, social seating areas. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
4. Footway between SuDS / multifunctional zone and private boundaries (minimum 2m wide where present)
5. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level



Example of local residential streets: Great Kneighton, Cambridge

Fig. 24. Example tertiary street layout (rural lane type)



Privately
owned

Public realm
(adopted/unadopted)

Privately
owned

Shared space layouts are only suitable for low-traffic streets with no through route for vehicles.

1. Hedge or low level planting to front of plots with generous setback to building line
2. Soft verge / SuDS zone with street trees
3. Shared space carriageway for walking, cycling and pedestrians designed to slow vehicle movements to walking speed
4. Soft verge / swale on both sides of street
5. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level

SM3: Create multifunctional streets which contribute to creating vibrant and active communities.

Expected	<p>Integrate seating, informal play and other functional features into the design of streets and movement routes at all levels of the street hierarchy.</p> <p>Design local and tertiary streets as low-speed public realm following homezone/Woonerf street principles to encourage outdoor play and social contact.</p>
Policy links	<p>A2: Housing design principles</p>



Fig. 25. Examples of multi-functional streets which allow necessary vehicle access but prioritise pedestrians and include play features, planting and social spaces.

Top left: Marmalade Lane, Cambridge

Top right: Van Gogh Walk, London

Middle left: Woonerf street, Netherlands

Middle right: Lime Tree Square

Bottom left: Great Kneighton, Cambridge

SM4: Ensure the amount and design of cycle parking and storage encourages cycling on an everyday basis.

Required	Show location, type and specification of cycle storage and parking within Design & Access Statement as well as Transport Statement / Transport Assessment (where applicable)
Expected	<p>For non-residential development, meet NCC minimum requirements for the amount and design of cycle storage and parking.</p> <p>For residential development, meet the following requirements for cycle storage in order to meet household needs in full, including cycles for children, for sport and leisure, and for visitors.</p> <ul style="list-style-type: none"> • For one-bedroom dwellings and HMOs, provide 1 resident cycle space per bedspace, and 1 visitor space per dwelling/HMO room. • For dwellings of two or more bedrooms, provide 1 resident cycle space per bedroom, plus one additional resident space, and 1 visitor space per dwelling. For example a three-bedroom dwelling should have 4 resident spaces and 1 visitor space. • For retirement housing, provide 1 secure resident cycle space, and one visitor cycle space, per two bedspaces. Many older people use cycles, and in particular e-bikes, for exercise and leisure. • For all residential cycle storage, provide one electric outlet per two cycle spaces to facilitate e-bike charging. • Provide adequate secure cycle storage to accommodate at least one cargo bike per dwelling. • Cycle storage must be additional to garages counted as an allocated parking space towards vehicle parking standards , unless the garage is large enough to accommodate cycle parking as well as a car. • Cycle storage can be within curtilage of dwelling but must be secure and covered e.g. cycle locker; dedicated store/shed; dedicated space within hallway/ secure porch; dedicated space within expanded garage. • Visitor spaces can be uncovered and outside of a secure enclosure, e.g. a Sheffield stand <p>Where practicable, locate cycle storage closer to entrance doors, than car parking/storage.</p> <p>Ensure cycle storage is secure and naturally overlooked to deter theft.</p>
Policy links	CS9: Encouraging well-designed, distinctive places I1: Vehicle parking for developments

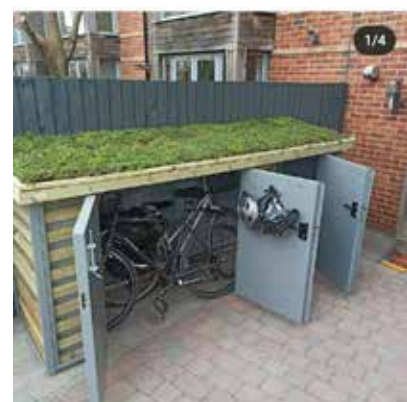


Fig. 26. Examples of attractive and functional cycle storage.

SM5: Ensure that the amount and design of car parking and storage is adequate and designed to minimize antisocial parking

Required	Show location, type and specification of car storage and parking and justify the quantity of provision within Design & Access Statement
Expected	<p>Have regard to NCC minimum requirements for the amount and design of car storage and parking across all forms of development.</p> <p>Provide lower levels of car parking in areas with good public transport, walking and cycling connections to local destinations, where this improves the overall design of the development. Use Public Transport Accessibility Levels and/or isochrone walking and cycling analysis to determine where lower levels of parking provision may be appropriate</p> <p>Include a mix of parking solutions (on-plot, on-street, shared parking areas/courts) to avoid a car-dominated environment.</p> <p>Avoid continuous front curtilage parking. Only include front curtilage parking where landscaping or a front garden can also be provided to reduce the visual impact of cars.</p> <p>Avoid rear parking courts unless they are well-overlooked, secure, small in scale and well-related to the car-owners property.</p> <p>Do not position garages (integrated or detached) forward of the front elevation of the associated dwelling to ensure garaging does not dominate the streetscene.</p> <p>Prevent pavement parking through well-designed physical deterrents along the kerb line, such as planting beds/SuDS features, bollards and/or street trees.</p> <p>Deter unplanned on-street parking through the design and layout of streets, and through inclusion and enforcement of parking restrictions.</p> <p>Use unallocated resident and visitor parking in mixed-use developments to reduce the overall amount of parking needed.</p> <p>Ensure visitor and employee parking includes electric car charging points and infrastructure to permit future additional charging points.</p>
Best practice	<p>Include car club provision as part of residential and mixed-use development.</p> <p>Design charging infrastructure to accommodate other vehicles including mobility scooters, electric cycles and electric buses.</p> <p>Provide electric car charging points (minimum of 7kW) within developments at the following levels:</p> <ul style="list-style-type: none"> • Dwellings with private parking: 1 charge point per dwelling (100% active) • Communal parking areas: 1 charge per parking space (50% active, 50% passive) • Employment: 30% with active charge points, and 30% with passive. • Retail: 20% of bays with active charge points, and 20% with passive.
Policy links	<p>I1: Vehicle parking for development</p> <p>A2: Housing design principles</p>

Preventing antisocial parking

On-street parking in designated bay helps accommodate delivery vehicles, service vehicles, visitor and overspill parking. However, uncontrolled parking at the kerbside can create a streetscape dominated by cars, and pavement parking reduces accessibility and safety for pedestrians, particularly vulnerable users including wheelchair users, users of pushchairs, and children.

Drivers will usually choose the easiest place to park, which is closest to their destination, even if this impacts other users and even when there are plenty of other spaces nearby. Pavement parking is rarely a symptom of inadequate provision of parking in the wider area. Use of planting, well-designed bollards at a spacing of 5m, street trees and other features will prevent pavement parking and ensure drivers park in designated visitor parking on the site.



Fig. 27. Examples of well-designed new developments that include on-street parking in a controlled way and deter unplanned parking.

Top left: SuDS used to prevent pavement parking by design. Image from the CIRIA SuDS Manual.

Top right: On-street parking between street trees, Greenhithe.

Middle left and right: use of bollards, trees and boundary treatments to deter unplanned parking, Lacuna, West Malling.

Bottom: SuDS used to prevent pavement parking at the Channels, Chelmsford.

SM6: Ensure adequate and well-designed access for servicing vehicles

Required	Analyse the requirements of the development in terms of size, numbers and types of commercial vehicles visiting and demonstrate that sufficient service vehicle provision is being made.
Expected	Design servicing access and dedicated service yards to be attractive and safe. Design servicing areas to be multi-functional outside of servicing periods, and integrated into the wider public realm design.
Policy links	CS9(e) - Encouraging well-designed, distinctive places

Useful resources:

- Manual for Streets (2007) - <https://www.gov.uk/government/publications/manual-for-streets>
- Manual for Streets 2 (2010) - <https://www.ciht.org.uk/media/9351/manual-for-streets-2.pdf>
- Cycle Infrastructure Design Local Transport Note (LTN 1/20) - <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>
- Historic England Streets for All (advice for highway and public realm works in historic places) - <https://historicengland.org.uk/images-books/publications/streets-for-all/>
- Norfolk County Council's Safe, Sustainable Development Aims and Guidance Notes - <https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/planning/safe-sustainable-development-2022.pdf>
- Sport England Active Design Guidance - <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

4.4 Public open space, nature and water

Communities must have access to good quality open spaces, and to nature and water, in order to support physical and mental health and wellbeing. Development must provide spaces that meet these needs, alongside improving the biodiversity of the local area. Biodiversity must also be improved through the provision of habitats as part of buildings themselves.

Green Infrastructure refers to the network of green and blue (water) spaces that support health and wellbeing, wildlife and carbon capture. Strengthening and extending the area’s Green Infrastructure network is a strategic aim of the Borough Council. This means creating and enhancing a network of green and blue corridors within development which join up wider habitats.

See also:

- [CC6: Ensure development is flood safe and flood resilient](#)
- [CC7: Reduce the risk of surface water flooding on and around the site](#)

PS1: Integrate existing natural features, including water and trees, in site layouts

Expected	Undertake and evidence a thorough analysis of existing site features and trees at an early stage to guide a landscape-led design approach Ensure development in urban neighbourhoods does not result in a net loss of green cover.
Policy links	CS11: Enhancing the natural environment E4: Trees and landscape A2: Housing design principles



Fig. 28. Examples of housing where existing mature trees and landscape features are used as the focal point of the layout.

Left: Carrowbreck Meadow
Right: The Avenue Saffron Walden

PS2: Provide a sufficient quantity, type, and quality, of public open space and green infrastructure with development

Required	Quantity of open space provided must comply with Policy H4 - Open Space provision for new housing development - and should refer to the Open Space SPD ² which contains numerical standards and guidance on typology design requirements.
Expected	<p>Integrate an appropriate range of public spaces, including green spaces, into development proposals.</p> <p>Design public spaces to be well overlooked, have a clear purpose and be in an accessible location within the development.</p> <p>Ensure public spaces include natural features, contribute to on-site biodiversity and minimise surface water run-off through use of SuDS. (Refer to CC7)</p> <p>Consider the needs of all users, including physically disabled people, people with visual impairments, and neurodiverse people, in the design of public spaces.</p> <p>Cater for a wide range of activities in public spaces, including meeting, resting, playing, holding events, sport and recreation, and be multi-functional where possible.</p>
Best practice	Meet the urban greening factors set out in Natural England’s Green Infrastructure Standards of 0.3 for commercial development, 0.4 for residential brownfield development and 0.5 for residential greenfield development.
Policy links	GSP6: Green Infrastructure H4: Open space for new housing development



Fig. 29. Examples of public open space performing a range of functions, including biodiversity, play and informal recreation.
Left: St Chads, Thurrock, Bell Phillips Architects.
Right: Granville Estate, London, PTEa

PS3: Ensure public access to watercourses

Expected	Create and/or retain public access to edge of watercourses and water bodies, with sufficient buffer zones to allow for maintenance and current/future flood defences. Design the level of waterside paths and public spaces so that a visual connection to the water can be maintained in relation to future flood defence levels.
Policy links	CS17(f) - Regenerating Great Yarmouth's Waterfront CS9(a) - Encouraging well-designed, distinctive places

PS4: Improve biodiversity on and around the development site

Expected	Use the location, type and design of open spaces, including SuDS, to improve the connectivity of wildlife habitats in the wider area, including the potential to connect to habitats that may be created through future adjacent development. Design open spaces to include a range of habitats which are suitable to the setting and climate of the site. Include habitat creation in the design of buildings, including car and cycle storage and parking structures, such as green roofs; climbing plants on walls; integral bird and bat boxes; insect habitats. Design fencing and walls to allow for movement of small mammals such as hedgehogs. Avoid the installation of green features which require extensive or specialist maintenance, such as 'living walls'. Climbing plants rooted at ground level are preferred
Policy links	CS11: Enhancing the natural environment



Fig. 30. Public realm next to watercourses and water bodies can take many forms, from busy urban environments supporting socialising, to peaceful neighbourhood ponds providing calm and relaxation. Left: Bristol waterfront. Right: Example from CIRIA SuDS Manual

PS5: Include street trees along movement routes and as part of public spaces

Expected	<p>All new streets to have suitable trees at regular intervals, chosen from species that are climate adapted and mature to a scale that provides substantial canopy cover</p> <p>Include new street trees on existing streets where possible as part of regeneration and redevelopment in existing neighbourhoods.</p> <p>Position street trees on median strips, in verges, between parking bays, and/or on pavements of sufficient width so as not to block active travel routes and infrastructure.</p> <p>On sites up to 1km from the sea, plant salt tolerant species such as, but not limited to, Whitebeam or Holm Oak. Hawthorn and Pedunculate Oak are also tolerant of cold exposed sites.</p> <p>Plant tree species which are resilient to hotter summers and wetter winters resulting from climate change.</p> <p>Avoid planting non-native ornamental species within rural settings.</p> <p>Plant trees which have a mature height, spread and canopy height that works with its functional setting, for example avoiding species with low-level branches next to footways and carriageways</p>
Policy links	A2: Housing design principles

Useful resources:

- Natural England's Green Infrastructure Standards (2023) - <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>
- CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments ([ciria.org](https://www.ciria.org))
- Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure (https://naturalengland.blog.gov.uk/wp-content/uploads/sites/183/2022/03/BNG-Brochure_Final_Compressed.pdf)
- Sensory Trust guidance on accessibility (<https://www.sensorytrust.org.uk/uploads/documents/ByAllReasonableMeansEnglandAug2020.pdf>)
- Greater Norwich active environments analysis on green infrastructure and spaces to be released march (but may be pushed back)
- Urban Tree Manual - <https://www.forestresearch.gov.uk/tools-and-resources/fthr/urban-tree-manual/>
- Trees and Design Action Group resources including Trees in Hard Landscapes - a Guide for Delivery - <https://www.tdag.org.uk/trees-planning-and-development.html>
- Active Design Guidance - <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>



Fig. 31. Examples of street tree planting.

Top left: new street trees planted in existing relatively narrow street. Mature trees at the end of the street show the benefit that trees at the scale of buildings can bring in Walthamstow, London

Top right: New street trees in a narrow mews lane street type at Great Kneighton, Cambridge

Middle left: Tall, narrow spread trees can be integrated in narrow urban settings as here in Winnipeg.

Middle right: Trees can make streets feel wider and frame spaces for seating as here in Paris.

Bottom left: Trees provide important shade and greening to larger urban spaces as at Eddington, Cambridge

Bottom right: Large street trees working well with other planting, even close to new homes at Elephant Park, London

4.5 Built form

Development should take an appropriate scale, form and pattern (sometimes referred to as typology) for its site and its function. This means using the site as effectively as possible to create good quality places that are inviting, characterful and active.

Most aspects of built form should be designed with reference to area specific code requirements. In this section, general principles are set out to ensure that development takes an appropriate form for the site, with regard to its location and context.

BF1: Create a scale, form and pattern of development that is structured and integrates with the scale of its context

Required	Demonstrate a clear design rationale for the scale, form and pattern of development through the Design & Access Statement.
Expected	<p>Create a clear hierarchy of landmark and background buildings through scale, form and massing.</p> <p>Ensure the scale and form of development at the site edges is well-integrated with its context and avoids abrupt changes in scale. Care should be taken to relate well to adjacent buildings and avoid extensive flank walls at party wall boundaries.</p> <p>Provide 3D visualisations of the proposal in context and from a variety of viewpoints that are, or will be, publicly accessible, including representation of development during the phasing process where appropriate.</p> <p>Refer to area specific code requirements regarding the form of development that is appropriate to the site.</p>
Policy links	<p>CS1: Focusing on a sustainable future</p> <p>CS9: Encouraging well-designed, distinctive places</p> <p>A2: Housing design principles</p>



Fig. 32. Examples of new buildings integrating well in very different contexts.

Left: housing sits comfortably in a rural context by using local materials, simple forms and hedges to form boundaries to the countryside at Salamanca Farm, Norfolk. Architect: A-Squared.

Right: Clear street pattern and design rationale with considered scale and massing at Goldsmith Street. Architect: Mikhail Riches

BF2: Ensure an appropriate sense of enclosure of streets and public spaces, and clear relationships between public and private space

Expected	<p>Buildings, and their main entrances, should face streets with private areas to the rear of the buildings.</p> <p>Create a visual sense of enclosure with a good relationship between the height and massing of buildings, landscape features (including trees) and the street. Example design approaches are shown in figures 17-23 and should be used as reference.</p> <p>In urban settings, local centres and high streets, the ratio of building heights to street width should be between 1:1 and 1:2. In other locations, the ratio of building heights to street width should be between 1:1 and 1:5. Street trees should be as tall as height of buildings or taller in accordance with the street code example layouts.</p> <p>Development should effectively turn corners at street junctions to avoid long blank walls and non-active frontages.</p> <p>Avoid areas of publicly accessible open space without a clear function.</p> <p>Refer to area specific code requirements for detailed requirements regarding building frontages and boundary treatments enclosing the public realm.</p>
Policy links	<p>CS9: Encouraging well-designed, distinctive places</p> <p>A1: Amenity</p> <p>A2: Housing design principles</p>

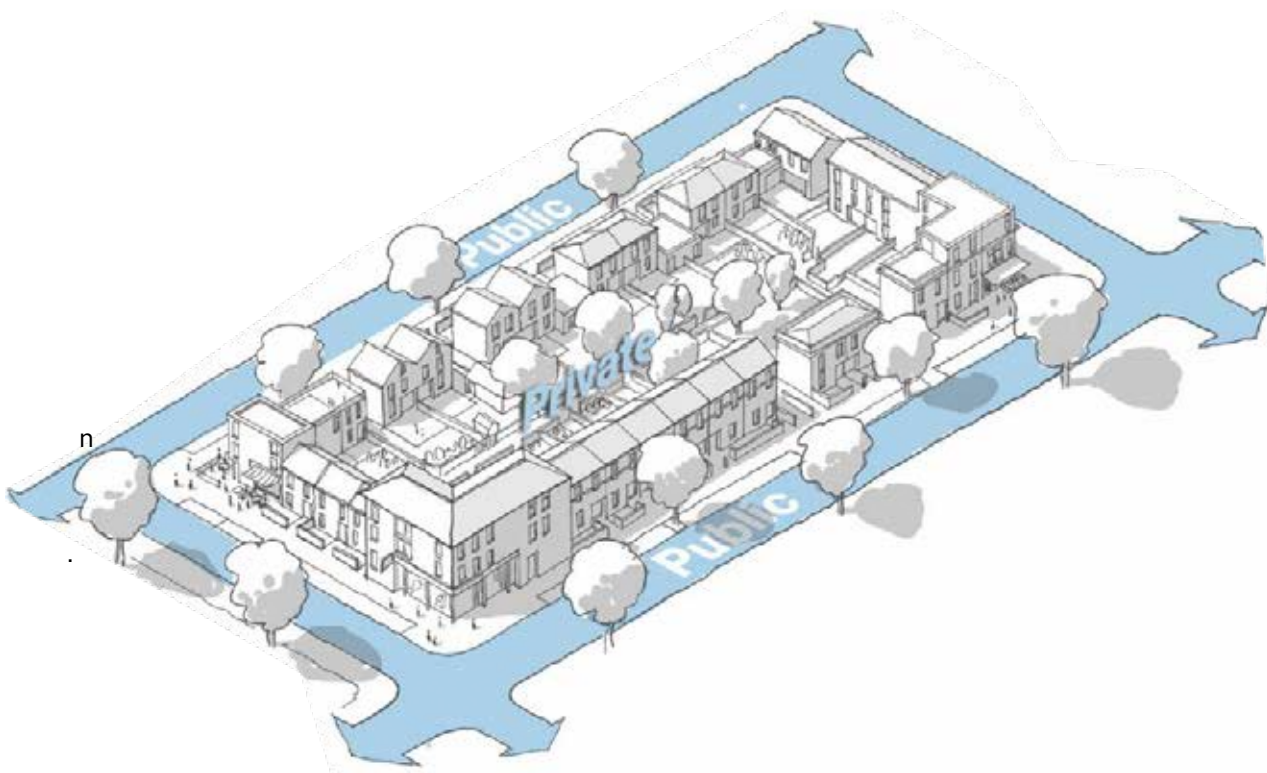


Fig. 33. Diagram from National Model Design Code showing clear enclosure and differentiation between public and private space within a block structure.

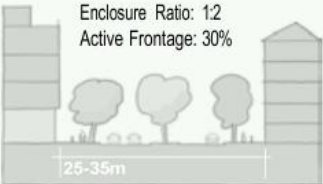





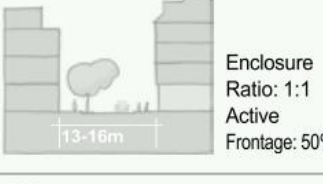


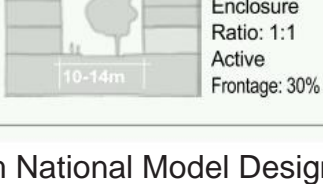
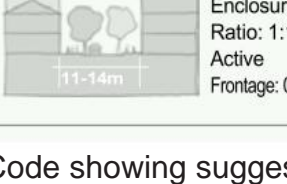

	Town centres	Urban neighbourhoods	Suburbs
Primary streets: Designed to take through traffic and public transport See P.1.i Primary Streets	 Enclosure Ratio: 1:2 Active Frontage: 30% 25-35m	 Enclosure Ratio: 1:2 Active Frontage: 10% 25-30m	 Enclosure Ratio: 1:5 Active Frontage: 10% 28-35m
High streets: The focus for local shopping centres, often with traffic but sometimes traffic-free See P.1.i Primary Streets	 Enclosure Ratio: 1:1 Active Frontage: 80% 15-20m	 Enclosure Ratio: 1:1.5 Active Frontage: 70% 17-23m	 Enclosure Ratio: 1:3 Active Frontage: 60% 17-22m
Secondary streets: Taking local traffic into neighbourhoods and often the location of shopping parades and local services such as shops See P.1.ii Local and Secondary Streets	 Enclosure Ratio: 1:1 Active Frontage: 50% 13-16m	 Enclosure Ratio: 1:1 Active Frontage: 30% 13-16m	 Enclosure Ratio: 1:3 Active Frontage: 20% 17-22m
Local streets: Providing vehicle access only to the properties on the street but with through pedestrian and cycle traffic See P.1.ii Local and Secondary Streets	 Enclosure Ratio: 1:1 Active Frontage: 30% 10-14m	 Enclosure Ratio: 1:1 Active Frontage: 0% 11-14m	 Enclosure Ratio: 1:2.5 Active Frontage: 0% 14-18m

Fig. 34. Diagrams from National Model Design Code showing suggested ratios of building height to street width for different street types and different neighbourhood types. A site specific approach should be taken to establish the most appropriate enclosure ratio, with reference to area specific code requirements and Streets and Movement section of the design code.



Fig. 35. Good design creates successful enclosure of streets and public spaces, and ensures corners are turned without blank flank walls.

Left: Goldsmith Street, Norwich. Architect: Mikhail Riches
Right: Channels, Chelmsford, Essex. Architect: JTP.

BF3: Make efficient and effective use of land through designing to appropriate residential densities and plot ratios

Required	Identify, through contextual analysis and options appraisal, the most appropriate development form and mix of uses that optimizes the capacity of the site with regard to its location and context. This must be demonstrated through the material submitted for all applications, including outline applications.	
Expected	Follow a design-led approach to achieving an appropriate density of development for the site. The indicative minimum housing densities for residential developments, set out in the adopted Local Plan, are:	
	Location – settlement(s)	Net minimum housing density (dwellings per hectare)
	Great Yarmouth Town Centre & Gorleston-on-Sea Town Centre, and edge of centre locations	50
	Elsewhere in the settlements of Great Yarmouth, Gorleston-on-Sea & Bradwell	35
	Caister-on-Sea, Belton, Hemsby, Hopton-on-Sea, Martham, Ormesby St Margaret and Winterton-on-Sea	30
	Elsewhere in the Borough	20
	<p>Justify the actual proposed density for the development through a contextual assessment of density and development pattern (typology) within the Design & Access Statement . The area used for the density calculations, and for any areas used for comparison, must be clearly shown within this assessment.</p> <p>For the purpose of density calculations, the relevant net site area should be measured to the rear of each plot and to the centre line of roads surrounding the site, whether they lie within the application boundary or not. Areas of substantial public open space, whether inside or adjacent to the site, should be excluded. Incidental open space (e.g. verges) should be included within the area calculation.</p> <p>The following measurements of density should be provided for all planning applications that include new residential units:</p> <ul style="list-style-type: none"> • number of dwelling units per hectare • number of habitable rooms per hectare • number of bedrooms per hectare • number of bedspaces per hectare <p>Plot ratios (the ratio between the site area and the total building floor area) and plot coverage (the proportion of the site area occupied by buildings) should be stated for mixed-use and commercial development. Plot ratios of over 2 are expected in town centre locations; between 1-2 in urban neighbourhoods; and between 0.5-1 in suburban/ rural locations.</p>	
Policy links	H3: Housing density	



Fig. 36. Diagram from the National Model Design Code showing how to measure site density. Note that the area boundaries go to the centre-line of streets and to the rear of plots, and do not include significant areas of public open space. Area A has a higher density than area B.

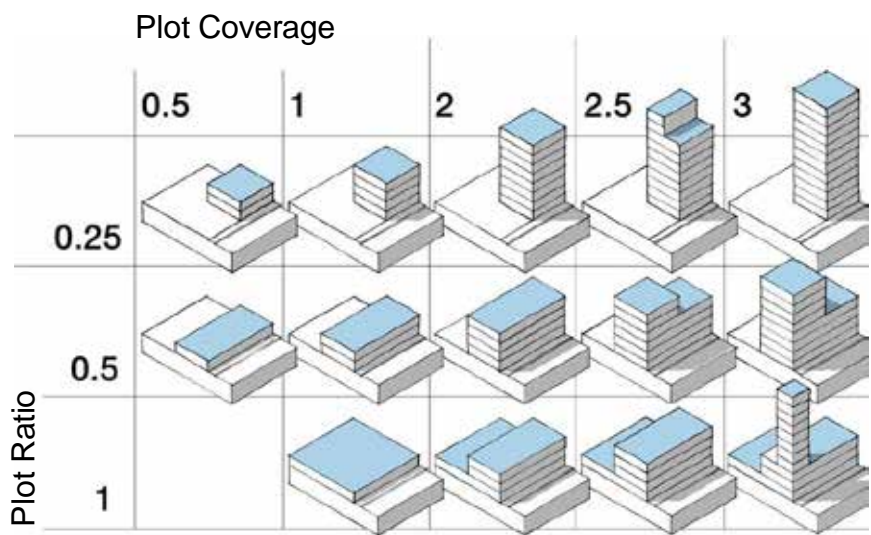


Fig. 37. Diagram from the National Model Design Code showing plot ratio and plot coverage. Plot ratio is the ratio between site area and the total building floor area while plot coverage is the proportion of the site area occupied by buildings.

BF4: Ensure building form and layout are optimized with regard to solar orientation, overshadowing and wind

Expected	<p>Design building massing and layout to optimize daylight and passive solar gains for internal spaces.</p> <p>Ensure building forms do not inappropriately overshadow public open space while providing shading where appropriate to reduce the urban heat island effect.</p> <p>Use building forms to shelter streets and public spaces from wind, and to avoid wind tunnel effects</p> <p>See also CC2: Minimise active heating and cooling requirements through passive design and CC8: Reduce urban heat island effect</p>
Best practice	<p>Evidence compliance with Passive House standards</p> <p>Evidence compliance with a TM59 overheating assessment</p>
Policy links	A1: Amenity

Useful resources:

- Resources listed in the Context and Identity section are relevant here.

4.6 Building design

Many aspects of building design should be developed with reference to area specific code requirements. In this section, borough-wide requirements and standards are set out that apply across all area types, and to new development of all kinds.

BD1: Create active frontages to the public realm

Expected	<p>Ensure frontages to streets and public spaces include the main entrances to the surrounding buildings, and windows/glazing providing a visual connection and passive overlooking of the public realm.</p> <p>Avoid frontages dominated by garage doors or service doors. Where non-habitable space is required due to flood risk, blank elevations must be avoided. Ground floors should be used for appropriate functions which can include entrance lobbies, workspace, commercial units, shared resident facilities such as cycle storage, utility rooms or bookable meeting/party rooms, as well as garage and refuse storage. Garage and refuse storage should not dominate street elevations.</p> <p>Ensure the design of relevant commercial frontages complies with the Shopfront Design Guide SPD³.</p>
Policy links	<p>CS9: Encouraging well-designed, distinctive places</p> <p>A2: Housing design principles</p>

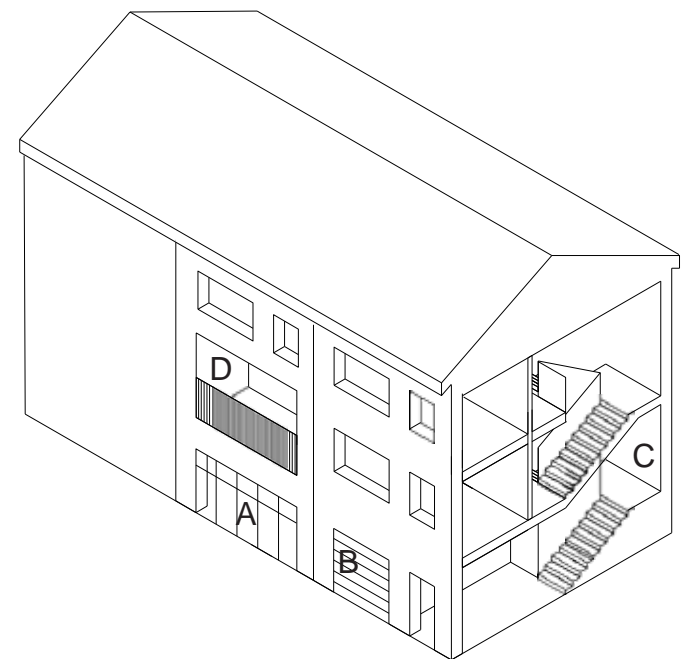


Fig. 38. Diagram showing how to maintain active frontages for development within Flood Zone 3.

- A Ground floor rooms below flood datum can be used for active uses such as workspace, utility space, or shared resident facilities.
- B Use of ground floor space for carports/garages is acceptable provided this does not dominate i.e. is alternated with other active ground floor uses.
- C Internal stairs to habitable space above flood datum. Internal stairs are safer than external stairs for residents and visitors as they provide a dry, enclosed entrance.
- D Consider provision of balconies to provide outdoor amenity space which is directly accessible from habitable rooms.

BD2: Ensure tenure-blind housing development.

Expected	<p>Ensure there is no visual difference, when seen from the public realm, between the design of homes for private sale, private rent, affordable rent or shared ownership.</p>
Policy links	<p>CS4: Deliverable affordable housing</p>

BD3: Create functional and accessible new homes with sufficient internal space.

Expected	Meet the M4(2) standard (accessible and adaptable) within Part M of the Building Regulations ⁴ , for all new homes unless impractical, for example due to site topography or flood risk. For homes within Flood Zone 3, where habitable spaces cannot be provided on the entrance storey, include lift access, or internal staircases which are sized to permit the installation of a stairlift if required, from street level to habitable spaces above the flood datum. Include space for home-working within dwellings, which can be through demonstrating that dedicated desk space can be accommodated within room layouts.
Best practice	Meet the Nationally Described Space Standards (NDSS) for the internal spaces within dwellings. Meet the M4(3) standard for 10% of all new homes.
Policy links	A2: Housing design principles

BD4: Ensure adequate daylight and sunlight for new homes, and no unacceptable loss of daylight or sunlight to neighbouring existing homes.

Expected	Follow the approach set out in the BRE document ‘Site Layout Planning for Daylight and Sunlight: A guide to good practice’ (2022) ⁵ . If a full daylight and sunlight assessment is not undertaken, ensure that the 25 degree rule of thumb is used.
Best practice	Daylight and sunlight report to be submitted demonstrating compliance with BS EN 17037
Policy links	A1: Amenity

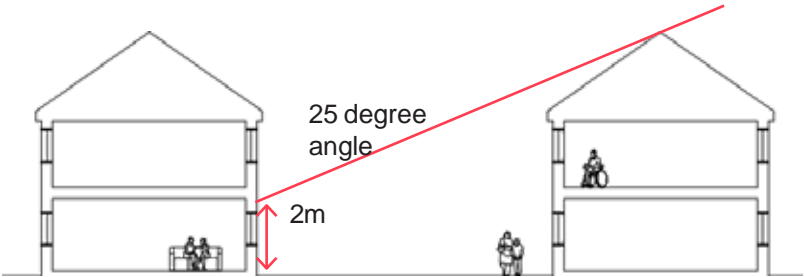


Fig. 39. Diagram showing the application of the 25 degree rule of thumb regarding overshadowing.

Windows are likely to receive adequate diffused daylight if no obstructions exist above a line at 25 degrees from a point 2m above floor level at the facade.

If closer spacing of buildings is desired:

- Include windows on both sides of the room
- Raise window head-heights and keep rooms shallow in plan.
- Ensure projections in plan do not project more than 45 degrees past the line of the window.

4 Building Regulations Part M - <https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m> Page 126 of 666

5 <https://www.brebookshop.com/details.jsp?id=328056>

BD5: Ensure adequate privacy for habitable rooms (living rooms, dining rooms, kitchens or bedrooms) and private outdoor amenity space

Expected	<p>When rear-facing or side-facing windows into habitable rooms are directly opposite each other, ensure a minimum separation of 20m unless windows are obscured or a fence or other visual barrier of above eye-level height (as viewed from the potential vantage point) is designed in.</p> <p>Where unobscured rear windows face each other at an angle of more than 30°, the minimum spacing may be reduced to 15m from the nearest corner.</p> <p>Where living rooms are located above ground level, rear-facing windows should be a minimum of 30m from rear-facing windows into habitable rooms of any other dwelling.</p> <p>The distances above can be reduced, and the requirement for above eye level screening, if careful building and landscape design ensures overlooking will not occur, or for apartments overlooking shared private amenity space.</p>
Policy links	A1: Amenity



Fig. 40. Diagrams showing parameters for privacy at the rear of new homes and example of apartment building where above-eye-level rear screening is not require, and distances can be reduced, for rear windows and balconies overlooking shared private amenity space, at the Silchester Estate (Architect: Haworth Tompkins)

BD6: Provide sufficient quality and quantity of private outdoor amenity space for residential development

Expected	<p>Dwellings with living areas at ground level must have direct access to one of the following:</p> <ul style="list-style-type: none">• Private gardens to detached or semi-detached homes - 40m2 minimum (for 1- or 2-bed homes), 75m2 (for 3-bed homes), 100m2 (for 4 bed homes or larger). Gardens to be a minimum of 5m wide and garden space to be provided in a single block, not split between front and rear.• Private walled outside courtyard gardens – 25m2 minimum, suitable only for higher density development forms such as terraces or ground floor flats/maisonettes within apartment buildings.• Shared communal gardens/courtyards - 25m2 minimum per dwelling <p>Dwellings with living areas above ground level should have a balcony or terrace of at least 5m2 for a one-bedroom home, with an additional 1m2 per additional bedroom. Balconies must have a minimum depth of 1.5m.</p> <p>Dwellings with living areas above ground level should have access to ground level shared communal garden/courtyard space with a minimum of 25m2 per dwelling, unless good quality public open space is accessible within a 1 minute walk.</p> <p>Specialist housing, including older people’s housing, is not required to meet these requirements but should demonstrate that adequate good quality, accessible and functional outdoor amenity space is provided for residents.</p> <p>All private amenity space should receive direct sunlight for at least four hours a day in June, and at least 60% of its area must receive direct sunlight on 21 March, as demonstrated through a sunlight analysis.</p> <p>Design private amenity space to have sufficient privacy for users and to be away from sources of noise and poor-quality air. Inset balconies provide better privacy, security, shade and shelter for residents than projecting balconies, as well as contributing to preventing internal overheating.</p>
Best practice	No more than 25% of the private amenity space should be prevented by buildings, walls or fences from receiving sunshine on 21 March.
Policy links	CS9(i): Encouraging well-designed, distinctive places



Fig. 41. Good site planning and a legible layout ensures evenly sized, useable gardens for units, with good rear privacy, at a range of sizes at the Humberston Par 3 development, Lincolnshire. Architect: Jonathan Hendry

BD7: Provide convenient and discreet refuse storage and utilities to meet user requirements.

Expected	<p>Provide residential refuse storage areas that meet the requirements of the local waste collection service.</p> <p>Demonstrate that commercial development proposals include adequate space for refuse storage and collection.</p> <p>Provide refuse storage areas that are enclosed, secure and visually attractive, and user-friendly, integrated with the site and building design. Refer to area specific code requirements for recommended locations of refuse storage to suit area character and development pattern.</p>
Policy links	A1: Amenity



Fig. 42. Refuse stores can become design features that add to the character and identity of new housing development as at Exhibition Mews, Whitehaven, Cumbria. Architect: Ash Sakula

BD8: Screen external plant and equipment from views from the public realm and from the upper floors of listed buildings.

A1: Amenity	<p>Use parapets and roof forms to screen plant, including air source heat pumps and ventilation equipment, located at roof level.</p> <p>Enclose ground level plant within attractive and secure screening that is integrated with other landscape and building treatments, and visually unobtrusive.</p> <p>Locate utility and meter boxes in unobtrusive locations which are visually screened and not on primary elevations.</p> <p>Drawings to be submitted that demonstrate that plant will be screened from the required viewpoints.</p>
Policy links	A1: Amenity



Fig. 43. Examples of well designed air source heat pump screening at Marmalade Lane, Cambridge. Architect: Mole Architects

BD9: Use boundary treatments that contribute positively to the character of the public realm and wider landscape.

Expected	<p>Design and specify durable and attractive boundary treatments which balance safety and crime reduction with creating well-overlooked, attractive places that encourage a sense of community.</p> <p>Ensure natural surveillance to streets and public spaces by limiting boundary treatments to the front of buildings to below 1m in height.</p> <p>Do not use close boarded fences for boundary treatments to the public realm or adjoining undeveloped land/countryside.</p>
Policy links	A2: Housing design principles



Fig. 44. Good quality boundary treatments, including to rear and side boundaries, are durable, attractive and complement the landscape setting. Example: Great Kneighton, Cambridge. Architect: Proctor Matthews

BD10: Provide external lighting which minimises light pollution while ensuring safety.

Expected	<p>Where external lighting is required, design lighting, and its controls, to preserve dark skies and avoid excessive light pollution.</p> <p>Provide adequate external lighting to ensure users of buildings and spaces, including more vulnerable user groups, feel safe at night, without contributing to light pollution.</p>
Policy links	A1: Amenity E6: Pollution and hazards in development

BD11: Design appropriate deterrents to nuisance bird nesting and roosting

Expected	<p>Consider how building form and design can deter nuisance bird nesting and roosting, such as by seagulls and pigeons, while creating habitat for threatened species such as swifts, swallows and house martins.</p> <p>Where deterrents are necessary, ensure they are visually discreet and minimally visible from the public realm.</p>
Policy links	A1: Amenity

Useful resources:

- Birkbeck D and Kruczkowski S et al (2020) Building for a Healthy Life - <https://www.designforhomes.org/project/building-for-life/>
- Great Yarmouth refuse storage requirements - link TBC
- BRE document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2022) - <https://www.brebookshop.com/details.jsp?id=328056>
- Institute of Lighting Professionals Guidance Note 1: reducing obtrusive lighting through design (<https://theilp.org.uk/category/ilp-guidance-notes/>)

5. Area specific design requirements

Great Yarmouth borough includes a wide variety of settlement types and development patterns. Each has specific characteristics which make it distinctive, and it is important that development proposals show that these characteristics have informed their layout and design.

To assist with this, the Design Code has set out the broad character areas and character types that can be found in the borough. This is a high level characterisation and should be used as a starting point for detailed, site specific character assessment as part of preparing development proposals.

Character areas are defined zones which have specific characteristics not found elsewhere in the borough. These have unique features and development proposals should carefully respond to, and enhance, this distinctive local character.

Character types are development forms or patterns which are found in various locations within the borough. Areas that share a character type have similar characteristics, and similar design approaches will be appropriate.

For all character areas and types, the design code sets out:

- Maximum / minimum densities / plot ratios (to be read in conjunction with [BF3](#))
- Development pattern (to be read in conjunction with [BF1](#), [BF2](#) and [BF4](#))
- Building line (to be read in conjunction with [BF2](#))
- Height and massing (to be read in conjunction with [BF1](#))
- Cycle and car parking (to be read in conjunction with [SM4](#) and [SM5](#))
- Servicing (to be read in conjunction with [SM6](#) and [BD7](#))
- Street elevation design (to be read in conjunction with [CI4](#), [BD1](#))
- Boundary treatments (to be read in conjunction with [BD9](#))
- Building design and materials (to be read in conjunction with [CI4](#))
- Landscape design and materials (to be read in conjunction with [CC7](#), [CC8](#), [PS1-5](#))
- Other relevant aspects of design and development that are specific to the character area or area type.

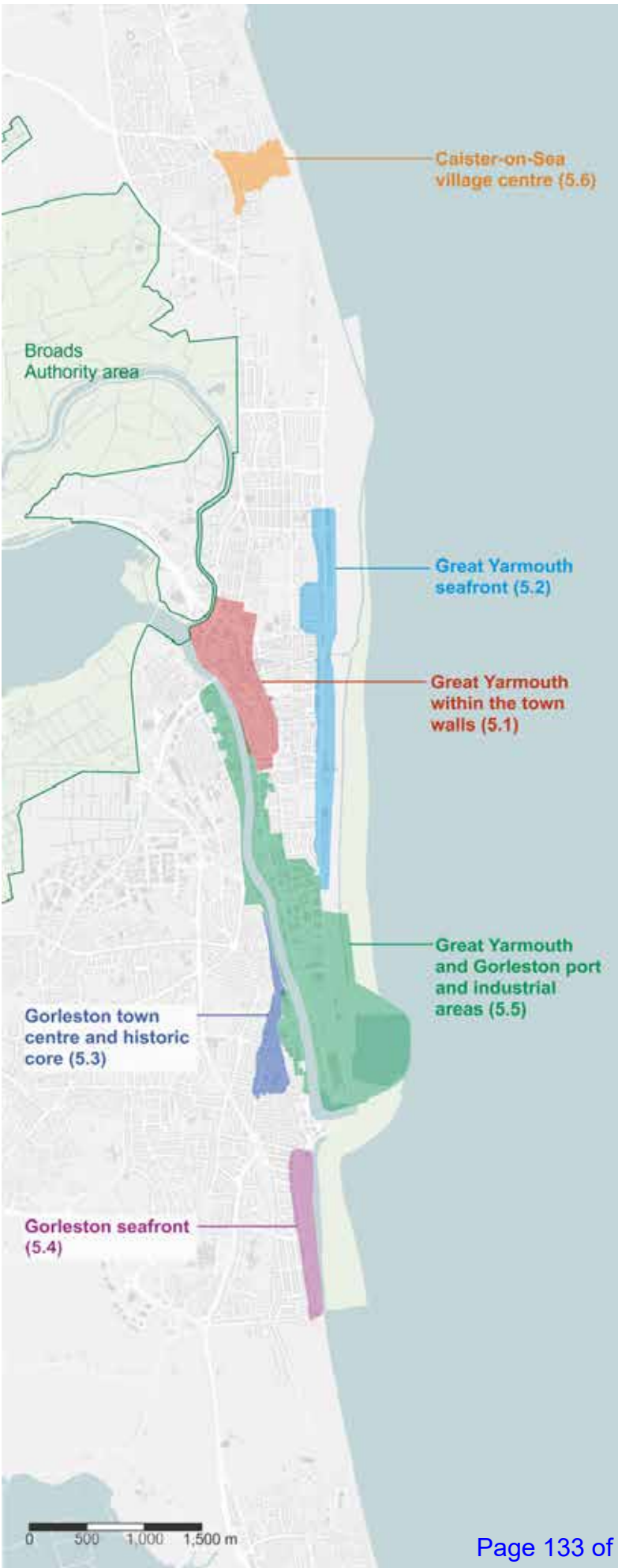


Fig. 45. Map of character areas within the borough. Area types are not shown.

Character areas

5.1 Great Yarmouth, within the town walls

To be read in conjunction with relevant Local Plan policies including those shown on figure 49.

The area within the medieval town walls of Great Yarmouth is of high historic significance, with a high density of listed buildings surrounded by the Scheduled Ancient Monument of the Town Wall, and including several Conservation Areas.

A number of site specific Local Plan policies and Supplementary Planning Documents are relevant to this character area, and these should be fully read and referenced in relation to any development proposals at any scale.

Area characteristics:

Central area (between St Francis Way and Yarmouth Way)

- The central area includes the remains of the tight pattern of east-west Rows, spanning between the north-south streets. This pattern – unique to Gt Yarmouth - was subject to extensive demolition and redevelopment from the 1930s onwards, which has left unattractive surface car parks and service yards particularly on either side of Howard Street and Greyfriars Way.
- Scale of buildings ranges from 2-8 storeys, with most buildings in the 3-6 storey range. Many buildings have attic storeys within pitched roofs (room in the roof) or mansard attic storeys set behind parapets.
- A wide range of building forms and styles is in evidence, due to the change and development/redevelopment the central area has seen over time.
- Buildings are predominantly faced in brick, stone and flint. The Victorian architecture includes ornamented brick and terracotta/faïence detailing with a strong and distinctive civic quality, while older brick and flint buildings have an affinity with the wider Norfolk material palette of villages and smaller settlements.

Area between St Francis Way, King Street and Friars' Lane

- In this area, the Row pattern was replaced with relatively low-density housing as well as commercial and industrial development, in a broadly gridded pattern but with generous gardens and green spaces.
- Buildings are typically 3 storeys, in apartment blocks or terraces set back behind front gardens, with private gardens and parking courts in the block interior.
- Some of the housing is good quality and attractive 1930s, 1940s and 1950s stock with attractive period details, such as brickwork and tilework patterns and decorative balcony guarding, and good internal space standards. The replacement of original windows with uPVC has been to the detriment of the external appearance of this housing.

South of Friars' Lane

- At the far south of the character area, industrial and commercial development has a low plot density and several empty plots, but some very good quality 1930s buildings including the Clipper Schooner.

Generally:

- The landscape setting of the Town Wall is in poor condition in many places and is not publicly accessible along all its length.
- The set-piece waterfront vista survives in relatively good condition for much of the area but is of poor quality towards the north and the south.

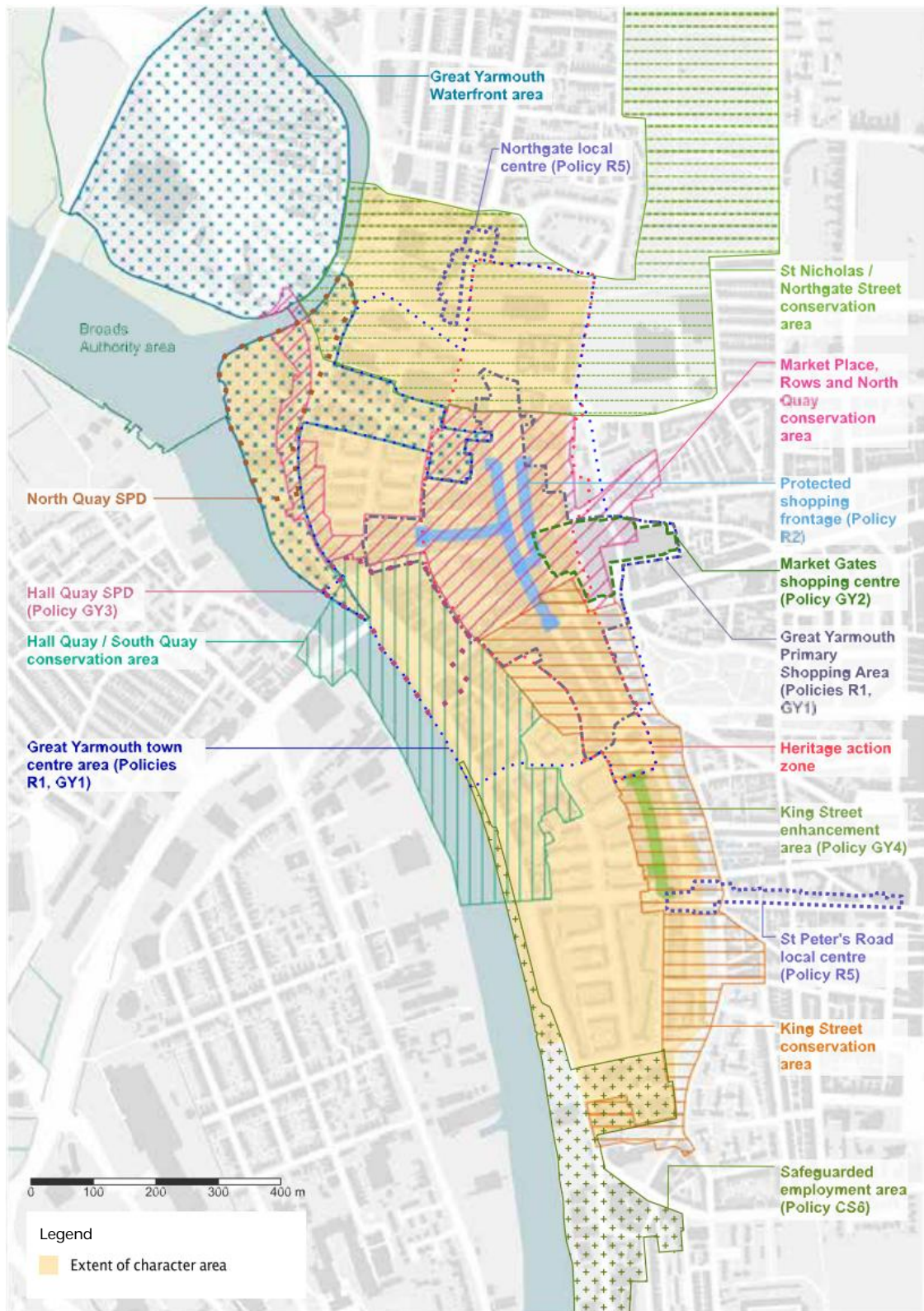


Fig. 46. Map of character area

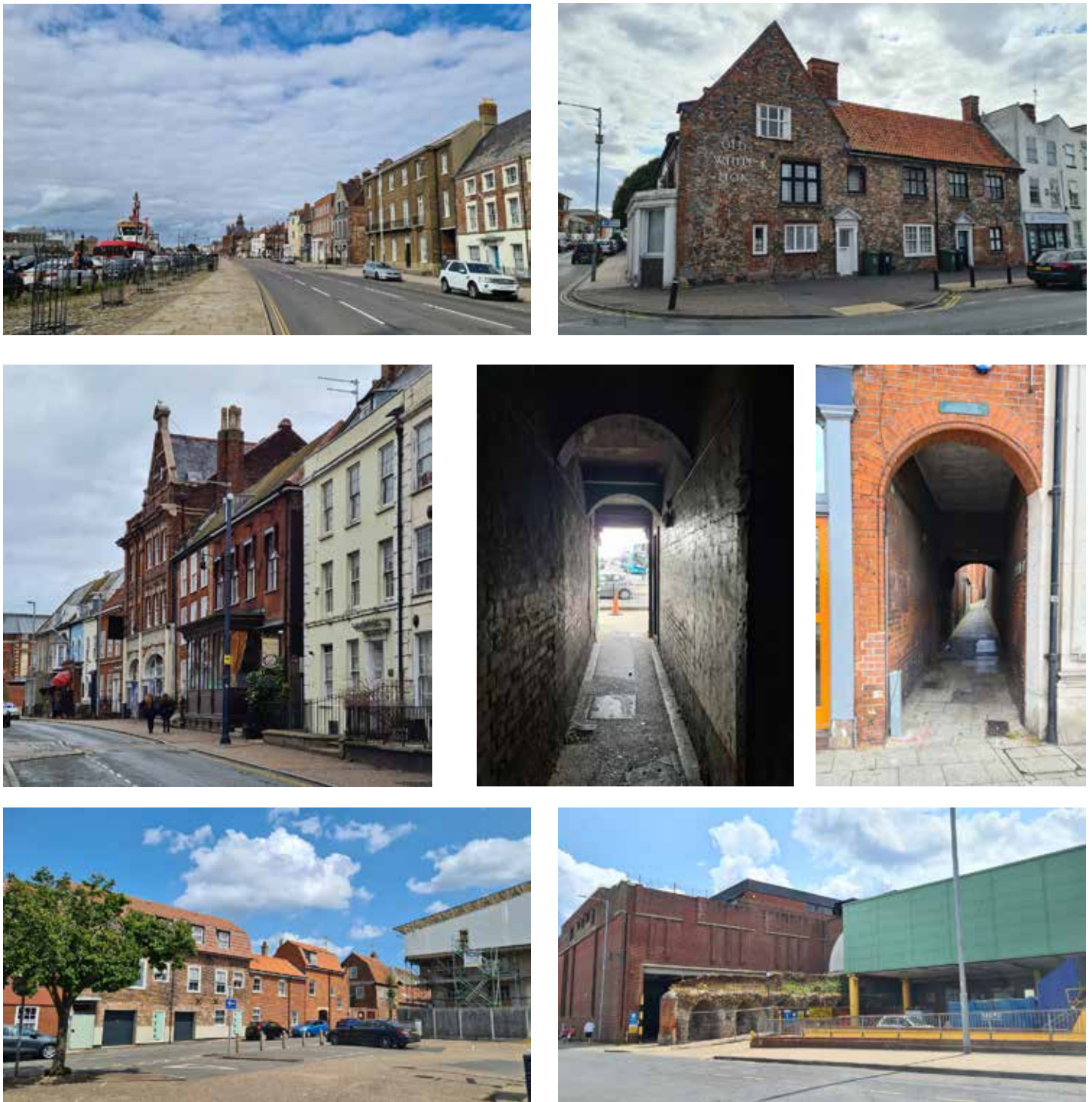


Fig. 47. Photos showing character of Great Yarmouth town centre.

Top left: South Quay and the waterfront. Currently somewhat dominated by vehicle traffic, this should improve with the opening of the third river crossing. The Georgian waterfront is mainly of brick.

Top right: Brick and flint forms the distinctive palette of the pre-18th century town, and of many later vernacular buildings.

Middle right: the north-south streets, such as King St, are relatively wide and have generally formal frontages to a consistent building line.

Middle right: The 'Rows' historically ran east-west and were extremely narrow - a few still survive.

Bottom left: Some well-restored and sensitively infilled streets remain, with new development and adaptation of existing buildings using traditional materials such as brick, pantiles and timber, but car parks disrupt the historic row pattern.

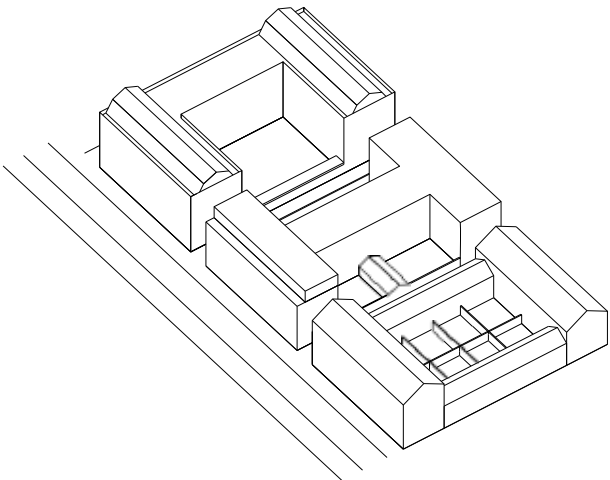
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Bottom right: The town wall setting is very poor in many areas.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Minimum 50 dwellings per hectare for residential-led development, with the expectation of higher densities of up to 150dph Plot ratios for mixed-use development of 2 or over.
Development pattern (see also BF1 , BF2 and BF4)	Reinforce the rectilinear grid pattern, with active frontages on all sides. New east-west streets can be created but new north-south streets or paths should be avoided.
Building line (see also BF2)	Central area and south of Friars Lane: Continuous built edge to the back of pavement/public realm. Variation from the building line of adjoining buildings should be under 1m. On street-facing elevations, balconies should be inset not projecting. Area between St Francis Way, King St and Friars' Lane: Buildings should follow the prevailing building line which is generally set back from pavement behind planted front gardens or well-landscaped parking.
Height and massing (see also BF1)	Predominantly 3-5 storeys. Occasional taller buildings where appropriate on waterfront sites and to form visual landmarks where existing important views will not be negatively impacted. Two-storey development is not generally appropriate for the urban character of this area. Central area: varied roof forms are acceptable, including mansard roofs, parapets with flat or mansard roofs behind, pitched and gabled roof forms. South of St Francis Way: Roof forms and massing should reinforce a consistent parapet or eaves line for the majority of the street.
Cycle and car parking (see also SM4 and SM5)	Provide a high ratio of cycle storage and parking provision, and a low ratio of car parking, due to excellent public transport, walking and cycling connections. Car free development is encouraged. Cycle parking and storage for residents and employees to be provided within building envelope or within the block interior. Car parking to be provided within the block interior, or in basement parking. For apartment and mixed use development, parking should be unallocated and include provision of car club spaces. Residential garage entrances are acceptable at ground floor level, designed to avoid unbroken runs of garage doors.
Servicing (see also SM6 and BD7)	Refuse storage to be provided within building envelope or within the block interior.
Street elevation design (see also CI4 , BD1)	Elevations should have a regular rhythm, unless clearly justified by the architectural concept. Where non-habitable space is required due to flood risk, blank elevations must be avoided – refer to BD1 for further guidance. New shopfront designs should be in accordance with the Shopfronts Design Guide

Boundary treatments (see also BD9)	<p>Central area and south of Friars' Lane: buildings should form the boundary to the street and public realm. Where service yards or courtyards abut the street, they should be bounded by solid walls to 2m minimum, in high quality materials e.g. brick or flint.</p> <p>Area between St Francis Way, King Street and Friars' Lane: On frontages, good quality brick or flint walls or metal railings (up to 1m high), or hedges/planted boundary treatments. For side boundaries to rear gardens, good quality brick or flint walls (up to 2m high) or hedges.</p>
Building design and materials (see also CI4)	<p>External façades should typically be well-detailed and high quality brick, flint, stone or traditional lime render. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Achieving the urban greening factor is likely to require the use of green roofs and climbing plants as well as landscape design.</p>
Landscape design and materials (see also CC7, CC8, PS1-5)	<p>Waterfront regeneration should enhance the landscape setting of the waterfront through tree planting, more seating and active uses and installation of soft landscape SuDS features. More space for pedestrians/cyclists should be created and the impact of vehicles reduced.</p> <p>Create public access to the full length of the Town Wall on both sides, where physically feasible, with associated public realm and landscaping which can include active uses (play, outdoor seating, outdoor gym, café seating sport and recreation).</p> <p>Existing and new public spaces should support a wide range of activities as well as forming part of the SuDS network and enhancing biodiversity.</p> <p>Additional street planting, of trees that will mature to provide good canopy spread and height, should be included where possible.</p> <p>Landscape design of privately managed areas should incorporate SuDS features including rain gardens and permeable paving.</p>
Other	<p>For redevelopment on North Quay and Hall Quay, refer to the adopted Supplementary Planning Documents.¹</p>



a) Courtyard arrangements should be oriented to maximise daylight and maintain adequate privacy between rear facing windows. A hard ‘garden wall’ to the ‘row’ can provide access to cycle parking within the courtyard. Car parking at low ratios can also be located within courtyards and accessed from the main streets.

b) Mews arrangements with small private courtyard gardens are the typical historic pattern of development along the rows, and still works today to create a low-rise high-density townscape.

Fig. 48. Diagram showing possible design approaches for dense town centre blocks maintaining ‘rows’ pattern of narrow pedestrian lanes between main streets while accommodating buildings of up to 6 storeys.

5.2 Great Yarmouth seafront

To be read in conjunction with relevant Local Plan policies including those shown on figure 50.

The seafront character area stretches from Jellicoe Road in the north to Main Cross Road in the south. It includes the buildings and landscapes on both sides of the seafront road (Marine Parade, North Drive) and includes the major tourist destinations of Great Yarmouth as well as the beach itself. Part of the character area is covered by the Seafront Conservation Area and site specific policies in the Local Plan also apply to parts. These should be fully read and referenced in relation to any development proposals at any scale.

Marine Parade and North Drive form a wide, continuous road that separates the seafront from the town and creates a set-piece vista that is emblematic of Great Yarmouth. The vista evolves from north to south and several distinct zones can be identified.

Area characteristics:

North Drive

- At this end of the seafront, the beach forms a wide and undeveloped shingle and sand expanse with marram grass. At points the sea is nearly 500m from the road.
- On the town side, 1930s housing is set back behind an access road, with a grassed strip separating the access road from North Drive. Homes have a strong and relatively unaltered 1930s character with steep pitched roofs accented with gabled projecting wings, symmetrical arrangements in groups of two to four homes, and low brick boundary walls to generous front gardens matching the brown-red brickwork of the homes themselves. Due to the exposed position there are few mature trees and front gardens are relatively sparsely planted. Front gardens are largely unaltered and have not, in the main, been converted to parking.
- Further south, newer homes, mostly detached and on generous plots, front directly onto North Drive and include a wider variety of styles, from 1950s to recent newly developed homes. Many have first floor balconies over garages at ground level. Homes are almost all two-storey, with some roof dormers providing a third storey. Low boundary walls to the street with most front gardens including some off-street parking. Some homes have attractive period features that add character, such as geometric balustrades to balconies, bay windows and feature chimneys.
- Further south, the Venetian Waterways is located on the beach side of North Drive, and is faced on the other side of the road by a continuation of the detached villa typology, many of which are three-storey and are now, or were originally designed, as hotels or inns. Arts and Crafts details predominate, with half-timbering, hung tilework, feature chimneystacks and strong projecting eaves to tiled pitched roofs, under which bay windows provide panoramic sea views.
- Between the Venetian Waterways and the Pier, car parks alternative with bowling greens between North Drive and the beach and the scale of building on the town side starts to become more varied with some large and imposing hotels.

Marine Parade / South Beach Parade

Most of this part of the seafront lies within the Seafront and Camperdown Conservation Area. The following is a high level summary of the characteristics of the conservation area.

- On the beach side, visitor attractions, many of historic merit, are set within distinct plots and have a set-piece, often sculptural character designed to be eye-catching at a distance. Buildings on the beach side of Marine Parade have extremely varied styles and scales, and this forms a distinctive resort character. Attractions alternate with surface car parks.
- On the town side, there is a continuous built frontage including many characterful and elaborate buildings, with bold shopfronts at ground floor level. Upper floors typically have projecting bays and balconies, and are mainly painted stucco or brick, often with well-preserved original balconies and windows and other details. The scale of buildings ranges from two to six storeys.
- Service yards and alleys to the rear of buildings are of mixed quality.
- From Camperdown to Kings Road the west side of the parade changes character to Regency terraces and large, neo-classical villas with a relatively unaltered period character set back behind landscaped gardens.
- South of Kings Road, the west side of the road reverts to detached two-and three-storey 20th century homes with similarities to the North Denes area, with a large surface carpark interrupting the frontage.



Fig. 49. The seafront area from above

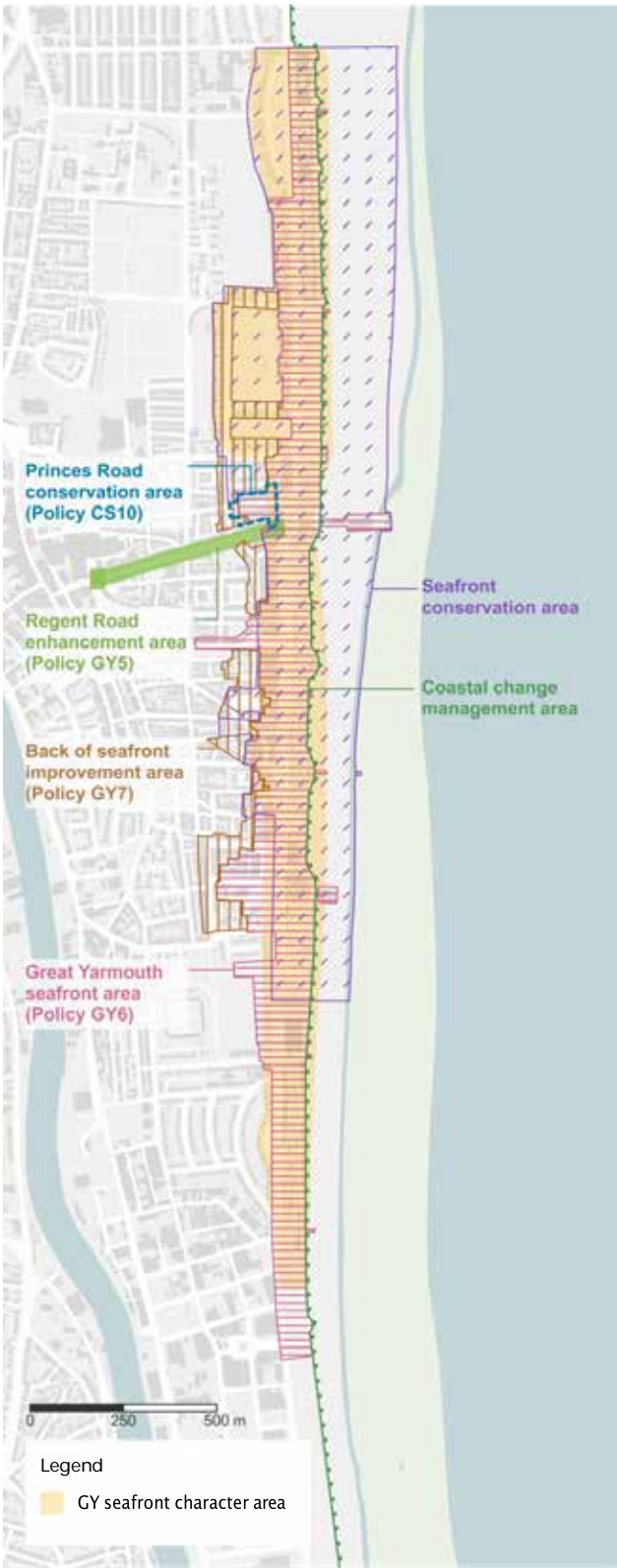


Fig. 50. Map of character area



Fig. 51. Photographs of the Great Yarmouth seafront area.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	<p>North Drive: Minimum 35 dwellings per hectare.</p> <p>Rest of the character area: Minimum 50 dwellings per hectare for residential-led development, with the expectation of higher densities of up to 120dph</p> <p>Plot ratios for mixed-use development of 2 or over.</p>
Development pattern (see also BF1 , BF2 and BF4)	<p>North Drive: detached, semi-detached and short terraced homes facing the street</p> <p>Marine Parade/South Beach Parade (west side): urban perimeter blocks with unbroken street frontages, terraces, garden squares and setpiece villas facing the street. All street elevations must be active frontages.</p> <p>Marine Parade/South Beach Parade (east side): detached seafront attractions set within landscaped grounds and with adequate spacing to ensure generous beach views between buildings.</p>
Building line (see also BF2)	<p>North Drive: buildings set back behind planted front gardens/curtilage parking.</p> <p>Marine Parade/South Beach Parade (west side): buildings predominantly tight to the back of pavement. Detached buildings occupying a full building block may be set back behind gardens or forecourt seating areas.</p> <p>Marine Parade/South Beach Parade (east side): buildings to be set back from pavement edge with generous landscaped public realm forecourts.</p>
Height and massing (see also BF1)	<p>North Drive: 2-3 storey development predominantly. 4 storey development may be acceptable in certain locations. Single-storey new development is not appropriate. Roof forms should predominantly match neighbouring building types unless a clear design rationale is presented for an alternative approach.</p> <p>Marine Parade/South Beach Parade (west side): 3-6 storey development predominantly. Taller buildings may be appropriate with careful design and siting. Varied roof forms are acceptable, including pitched, hipped, and mansard roofs, parapets with flat or mansard roofs behind, and dormers.</p> <p>Marine Parade/South Beach Parade (east side): Due to the nature of seafront attractions, height parameters are not appropriate but building heights and massing should be carefully determined through site specific analysis to limit impact on views and setting of heritage assets.</p>

<p>Cycle and car parking (see also SM4 and SM5)</p>	<p>North Drive: Cycle storage and parking should either be integrated into the design of front curtilage areas or within the building envelope. Parking can be provided within front curtilage areas but must be well screened by landscaped boundary treatments.</p> <p>Marine Parade/South Beach Parade (west side): For residential development, provide a high ratio of cycle storage and parking provision, and a low ratio of car parking, due to excellent public transport, walking and cycling connections. Commercial development, including hotels, to provide parking within the block interior.</p> <p>Marine Parade/South Beach Parade (east side): For tourist attraction and facilities, visitor car parking ratios to be clearly justified by transport analysis and a high level of secure and sheltered cycle parking should be provided. Cycle and car parking and storage for residents and employees to be provided within building envelope or within the block interior.</p>
<p>Servicing (see also SM6 and BD7)</p>	<p>North Drive: Refuse storage should be integrated into the design of front garden/yard space; or provided within the building envelope.</p> <p>Marine Parade/South Beach Parade: Residential refuse storage to be provided within building envelope or within the block interior. Commercial refuse storage to be carefully designed and sited to avoid visual impact, control odour, and discourage vermin.</p>
<p>Street elevation design (see also CI4, BD1)</p>	<p>Careful design of street elevations is required to maintain the quality of the seafront vista. Where non-habitable space is required due to flood risk, blank elevations must be avoided – refer to BD1 for further guidance.</p> <p>North Drive: Elevations should have a regular rhythm which supports the overall visual unity of the street frontage, unless clearly justified by the architectural concept.</p> <p>Marine Parade/South Beach Parade (west side): Careful consideration of elevational design and proportion should be demonstrated through drawn street-scene elevations and perspective views of the proposal in context.</p> <p>Elevation design should include ornamental and decorative detailing including bay windows, decorative metalwork to balconies, eaves and verge detailing and shaped timber fascias, while ensuring maintenance is fully considered.</p> <p>Marine Parade/South Beach Parade (east side): Elevation design must be carefully considered and detailed to provide outstanding landmark buildings which enhance the quality of the seafront.</p>

<p>Boundary treatments (see also BD9)</p>	<p>North Drive: Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging or planting – all below 1m high. Side and rear garden boundaries to the public realm should be bounded by native hedging, post and rail fences or solid masonry walls.</p> <p>Marine Parade/South Beach Parade (west side): Active building frontages should form the street edge. Where buildings are set back from the pavement edge, boundary treatments must be kept below 1m in height to maintain an active frontage relationship and permeability to the street. Boundary treatments could include brick/flint walls, good quality metal railings, or planted boundaries.</p> <p>Marine Parade/South Beach Parade (east side): Boundary treatments to the street and to the beach must be carefully designed to be attractive and high quality while maintaining necessary security. Utility fencing is not generally acceptable.</p>
<p>Building design and materials (see also CI4)</p>	<p>North Drive: External façades should typically be appropriately detailed brick, flint, or hung tile. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept. Retain the coherence of the street frontage, and other frontages visible from the public realm, through careful design of any alterations and extensions visible from the street, and the redevelopment of plots, particularly for the 1930s housing north of Tennyson Road where the unified frontage is an asset.</p> <p>Marine Parade/South Beach Parade (west side): A wide range of external materials may be used but must be clearly justified by the architectural concept. Materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance. For this reason brick, flint, good quality hung plain tile and other self-finished materials may be preferable for the majority of the external envelope. Achieving the urban greening factor is likely to require the use of green roofs and climbing plants as well as landscape design.</p> <p>Marine Parade/South Beach Parade (east side): Design of new seafront attractions and public realm should continue to provide bold, vibrant and characterful landmarks which have a distinctive resort character, and which present a positive and active frontage to the public realm. A wide range of external materials may be used but must be clearly justified by the architectural concept. Materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance.</p>

Landscape design and materials (see also CC7, CC8, PS1-5)	<p>Improving the quality, accessibility and climate resilience of the public realm is a priority for this character area, within both publicly and privately owned and maintained areas. Additional large scale street trees should be incorporated where possible to increase canopy cover and provide shade. All landscaping must include soft landscaped SuDS features and parking areas should use permeable paving materials.</p> <p>Public realm and landscape design should reduce the dominance of vehicle traffic and parking on the streetscape while maintaining necessary access and parking. Public open spaces should become more multi-functional, with seating, shade and shelter to allow for year-round use.</p> <p>Private gardens and open spaces make a significant contribution to the green infrastructure network for wildlife and biodiversity. Planning conditions should ensure soft landscaping is retained within privately owned and maintained areas, and not replaced with hard landscaping or artificial grass over time.</p> <p>Planting should use species that are salt- and drought-resistant, suitable for the exposed marine environment.</p>
Other	<p>Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals. Enhancing the appearance and setting of the many listed buildings along the seafront must be a priority.</p> <p>Existing and new public spaces should support a wide range of activities as well as forming part of the SuDS network and enhancing biodiversity.</p>

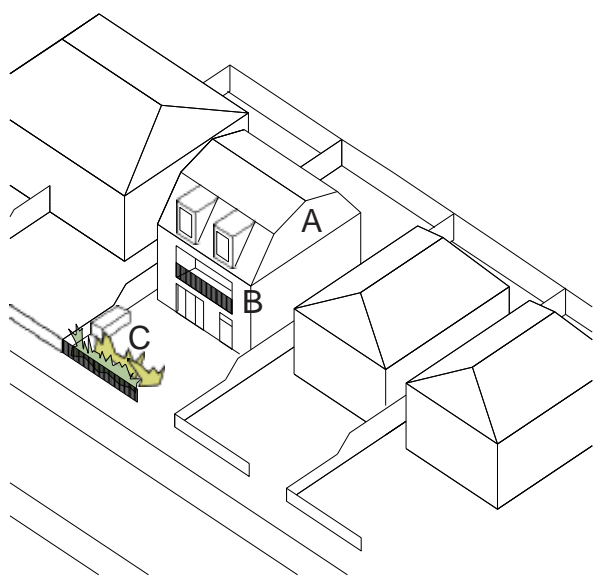


Fig. 52. Diagram showing North Drive infill development parameters

A Pitched roof forms can reduce the visual impact of 3 storey new buildings adjacent to 2-storey existing buildings.

B Inset balconies provide greater shelter from the wind and maintain a coherent building line

C Well planted front garden with low boundary treatment and on-plot car parking, cycle storage and refuse storage.

5.3 Gorleston town centre and historic core

To be read in conjunction with relevant Local Plan policies including those shown on figure 57.

This character area comprises the historic core of Gorleston, including the Conservation Area between the southern length of its High Street and eastern industrial estate. The remaining region of the town centre to the north is within the Gorleston Conservation Area Extensions.

Area characteristics:

- Low-rise, tight-knit development pattern interrupted by some larger commercial and industrial premises, with a wide variety of building styles and period but rarely above 3 storeys in height in the core of the town centre
- The level change from the High Street to the waterfront is significant, and new development on the waterfront ranges up to five storeys in height.
- In the core of the High Street buildings have little or no setback from the pavement, but on other streets a variety of setbacks and front gardens/yards is present.
- Several unlisted buildings contribute significantly to the overall character and street scene in this character area, specifically those with red brick and natural slate construction and timber sash windows around the High Street.
- Commercial/light industrial sites in some back land plots have potential for redevelopment



Fig. 53. Gorleston town centre seen from Quay Road, showing the low-rise tight-knit pattern of development.

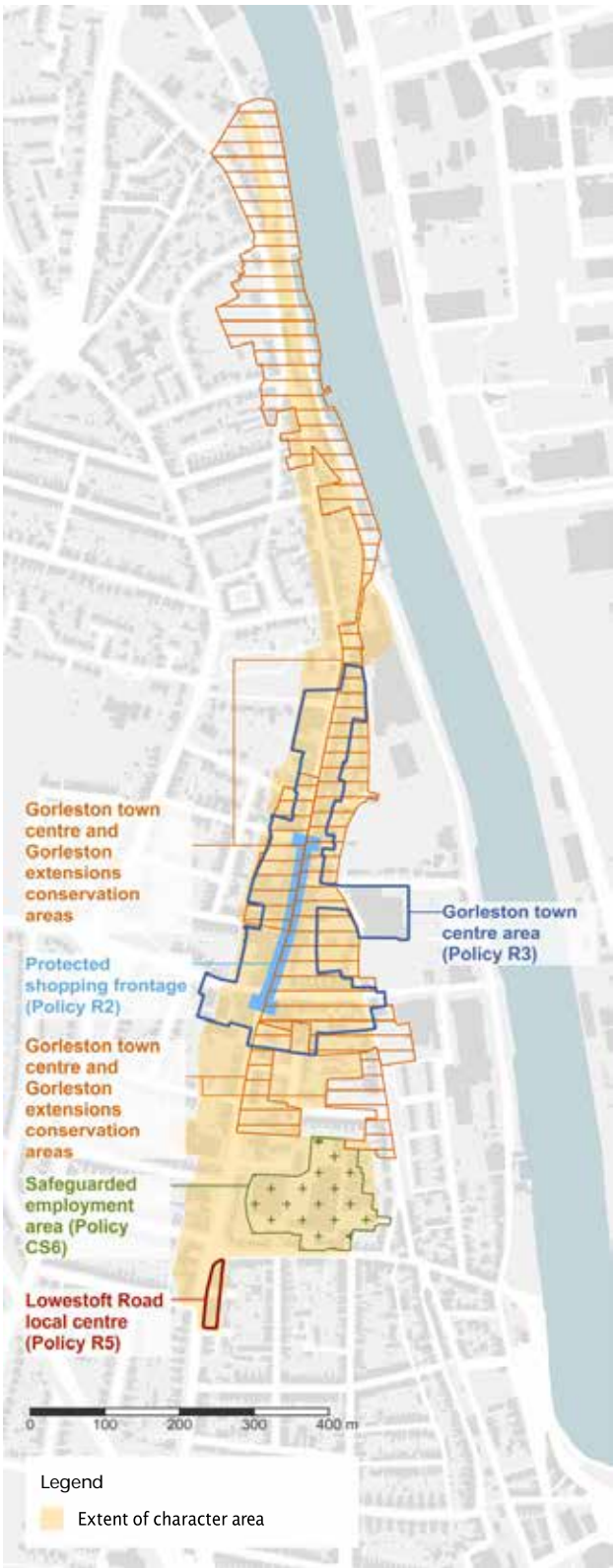


Fig. 54. Map of character area

Fig. 55. Photographs of Gorleston town centre showing the range of building styles and ages, and the occasionally gappy streetscene which could be ‘mended’ through appropriate infill development.



Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Minimum 50 dwellings per hectare for residential-led development, with the expectation of higher densities of up to 100dph Plot ratios for mixed-use development of 2 or over.
Development pattern (see also BF1 , BF2 and BF4)	Low-rise high-density blocks with unbroken street frontages.
Building line (see also BF2)	Continuous built edge to the back of pavement/public realm. Variation from the building line of adjoining buildings should be under 1m. On street-facing elevations, balconies should be inset not projecting.
Height and massing (see also BF1)	Predominantly 2-3 storeys. 4 storey development may be appropriate in locations where this does not dominate the streetscape and away from corners. Varied roof forms are acceptable, including pitched, hipped, gambrel and mansard roofs, parapets with flat or mansard roofs behind, and dormers.
Cycle and car parking (see also SM4 and SM5)	Provide a high ratio of cycle storage and parking provision, and a low ratio of car parking, due to good public transport, walking and cycling connections. Car free development may be appropriate on certain sites. Cycle and car parking and storage for residents and employees to be provided within building envelope or within the block interior. Garage doors should open onto internal courtyards and not onto the street.
Servicing (see also SM6 and BD7)	Refuse storage to be provided within building envelope or within the block interior.
Street elevation design (see also CI4 , BD1)	Elevations should be relatively simple and regular compositions. New shopfront designs should be in accordance with the Shopfronts Design Guide
Boundary treatments (see also BD9)	Buildings should form the boundary to the street and public realm. Where service yards or courtyards abut the street, they should be bounded by solid walls to 2m minimum, in high quality materials e.g. brick or flint. Good quality metal railings with planting behind may be acceptable on side streets.

<p>Building design and materials (see also CI4)</p>	<p>External façades should typically be well-detailed and high quality brick, flint, traditional lime render or painted brick in colours drawn from the local palette. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Alterations and energy efficiency improvements should not obscure high quality existing external materials such as brick and flint work. Replacement windows, balcony metalwork and similar should be of similar quality as the existing.</p> <p>Achieving the urban greening factor is likely to require the use of green roofs and climbing plants as well as green cover as part of landscape design.</p>
<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Landscape design should incorporate SuDS features including rain gardens and permeable paving. Additional street planting, of trees that will mature to provide good canopy spread and height, should be included where possible.</p>

5.4 Gorleston seafront

To be read in conjunction with relevant Local Plan policies including those shown on figure 59.

This character area comprises the seafront of Gorleston stretching south from the pier and the harbour arm along Marine Parade, including the public open green space. The majority of the Gorleston seafront is within the Gorleston Conservation Area Extensions.

Area characteristics:

- Gorleston's sea facing buildings on the Marine Parade are mostly early 20th century detached and semi-detached variations on villa typology. Those at the northern end are more generously scaled, up to 2.5 storeys in height, while towards the southern end the scale of buildings decreases to more modest proportions.
- Villas typically have prominent pitched roofs with dormers and rooms in the roof rather than a full upper storey.
- Villas are set back from the pavement edge behind well-planted and generous front gardens, usually including on-plot parking.
- The villas are often with stylistic flair, features and individual detailing – whether Gothic Revival, Arts and Crafts, neo-Georgian, neo-Elizabethan, modernist or mid-century styling. Bay windows can be characterful and sometimes topped with decoratively detailed leaded canopies. While the villas are not uniform in design, they typically are found in small groupings built at a similar time, and sharing stylistic features.
- The villas form the backdrop to well-used public open green space which includes community sports facilities, and an important vista in the townscape.



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Fig. 56. Map of character area

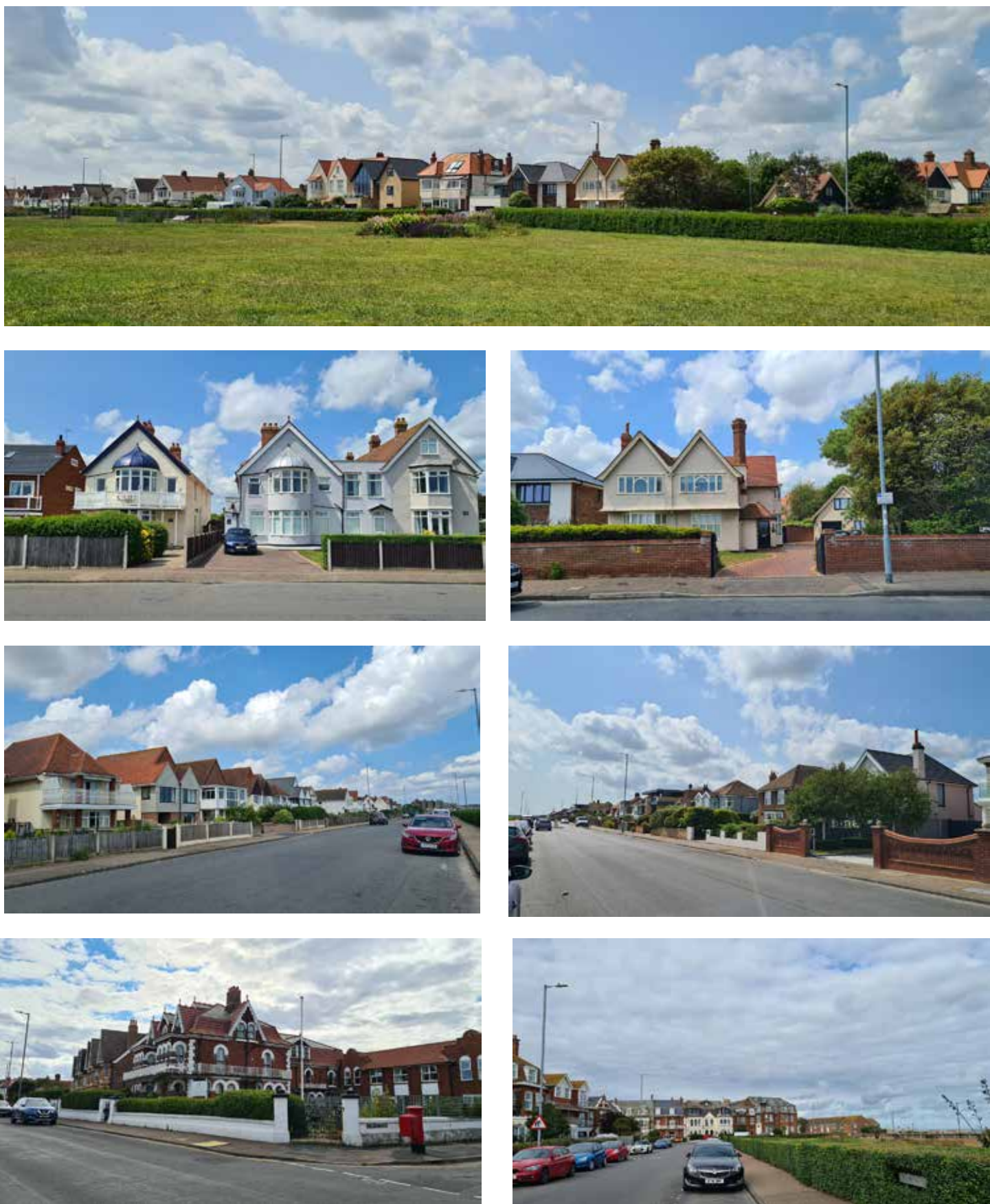


Fig. 57. Photographs of Gorleston seafront showing the generally uniform scale and development pattern with individual variety of dwelling design bringing character and liveliness to the streetscene. It can be seen how flat-roofed dwellings need careful design if they are not to appear boxy and out of place among the typical pitched-roof forms.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	35-50 dwellings per hectare for residential-led development. Development of apartments may reach slightly higher densities, depending on unit type and mix.
Development pattern (see also BF1 , BF2 and BF4)	Detached and semi-detached building types within a villa pattern. Short terraces (e.g. 4-6 townhouses) may be appropriate in certain locations.
Building line (see also BF2)	Set back from the pavement edge with planted front gardens and on-plot parking. Building line should not be set more than 2m forward or behind the line of adjacent buildings.
Height and massing (see also BF1)	<p>Predominantly 2-2.5 storeys. 3 storey massing may be appropriate in certain circumstances but must be carefully justified with reference to the impact on context, and is unlikely to be acceptable as the predominant height for new buildings.</p> <p>Roof forms should be typically pitched, hipped, gambrel or mansard roofs, with steep pitches and dormers/gables. 'Catslide' roofs and chalet-style roof forms can be used. Flat roofed forms can be appropriate if carefully designed in relation to adjacent buildings, with high quality parapet detailing and well-proportioned windows.</p> <p>Inset balconies are preferable on street-facing elevations as these provide better shelter from wind, and can be more coherently integrated with the overall form and massing of buildings.</p>
Cycle and car parking (see also SM4 and SM5)	<p>Both cycle and car parking and storage should be generously provided on-plot, due to the lower residential densities and larger size of homes expected in this character area. Car parking should include on-plot visitor parking. Good levels of secure, enclosed cycle storage should be provided close to front doors of homes and could be integrated with the provision of refuse storage.</p> <p>Where garages are provided (integrated or detached), these must not be set forward of the general building line.</p>
Servicing (see also SM6 and BD7)	Refuse storage areas should be integrated into the design of front garden/parking areas.
Street elevation design (see also CI4 , BD1)	<p>Careful consideration of elevational design and proportion should be demonstrated through drawn street-scene elevations and perspective views of the proposal in context.</p> <p>Elevation design could include ornamental and decorative detailing including bay windows, decorative metalwork to balconies, eaves and verge detailing and shaped timber fascias.</p> <p>Avoid overheating resulting from overly large expanses of unshaded glazing. External shading to glazing can provide an opportunity for additional articulation to elevations.</p>

Boundary treatments (see also BD9)	Boundary treatments to the street should be either low brick/flint walls, open timber fencing or good quality metal railings up to 1m tall, with planting in front and/or behind; or native hedging up to 1.3m tall. A visual connection between building and street must be maintained at eye level to maintain natural surveillance and safety.
Building design and materials (see also CI4)	A wide range of external materials may be used but must be clearly justified by the architectural concept. Materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance. For this reason brick, flint, good quality hung plain tile and other self-finished materials may be preferable for the majority of the external envelope.
Landscape design and materials (see also CC7 , CC8 , PS1-5)	On-plot parking should be surfaced in permeable materials. Tree planting within front and rear gardens is encouraged. Additional street planting, of trees that will mature to provide good canopy spread and height, should be included where possible. Materials and choice of plants in landscaping must be suitable for the exposed marine location.

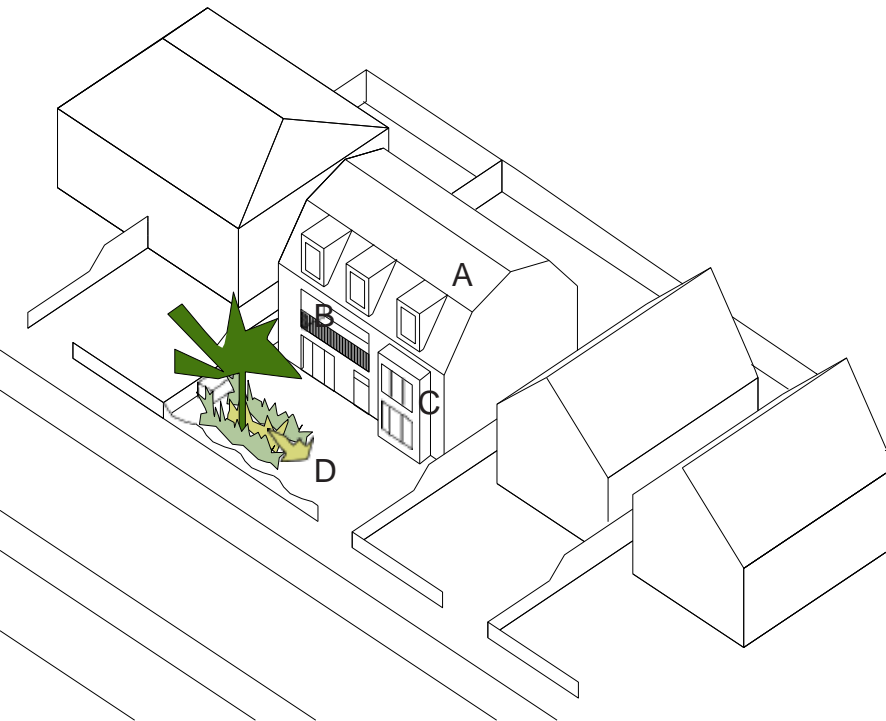


Fig. 58. Diagram showing development parameters for new detached seafront homes

A Pitched roof forms can reduce the visual impact of 3 storey new buildings adjacent to 2-storey existing buildings.

B Inset balconies provide greater shelter from the wind and maintain a coherent building line

C Bay windows and other features create an attractive frontage with detail that enhances the streetscape.

D Well planted front garden with low boundary treatment and on-plot car parking, cycle storage and refuse storage.

5.5 Great Yarmouth and Gorleston port and industrial areas

To be read in conjunction with relevant Local Plan policies including those shown on figure 62.

The port and industrial areas have more recent development in the borough and are an important visual reminder of the economic vitality/regeneration of the borough. In Great Yarmouth Town, South Denes port covers a significant portion of this character area and has a Design Code and Enterprise Zone in place. However, other industrial areas have potential for redevelopment over time.

The design code requirements in this section relate to residential and mixed use redevelopment and not to industrial/warehousing single use development, which should follow the code within the Local Development Order.

Area characteristics:

- A strongly gridded plot pattern of relatively large plots with a wide range of building ages and styles, from good quality survivals of late 19th and early 20th century industrial buildings, to very recent large warehouses and including uncovered storage yards.
- Buildings are substantially in size and have very simple, functional massing
- There is a notable contrast between South Quay (historic waterfront) and the industrial development pattern on the other side of the river although they are seen together in the prominent riverfront vistas. The Victorian gasholder is prominent in long views.
- Earlier industrial buildings are predominantly brick with some concrete frame buildings with expressed structure giving them a strongly horizontal rhythm to their elevations. Some have attractive decorative features, large windows and address the street with articulated porches and elevational design.
- Later buildings are predominantly steel framed with lightweight sheet cladding emphasizing their simple massing of predominantly extruded pitched-roof forms.
- Some residential and other building types remain within the port and industrial areas, such as former pubs, churches as well as operational shops, cafés and smaller workshop buildings sometimes now used for studios. In many instances these add positively to the character of the streetscape.



Fig. 59. The riverfront industrial area seen from the bridge (left) and from the Gorleston riverfront (right)



Fig. 60. Map of character area

Fig. 61. Photographs showing the mixed nature of the character area. Due to the topography, views from Gorleston overlooking the riverside areas need to be considered. New apartment buildings present a blank and inactive ground floor frontage and do not take design cues from the attractive older industrial buildings which could form a strong reference point for the scale and articulation of substantial new buildings



Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	<p>Minimum 50 dwellings per hectare for residential-led development with the expectation of substantially higher densities. Over 150 dwellings per hectare may be achievable.</p> <p>Plot ratios for mixed-use development of 2 or over.</p>
Development pattern (see also BF1 , BF2 and BF4)	Perimeter block development within gridded street pattern. Block pattern must be of sufficient scale to support higher density urban scale development. Where new streets and public routes are created, these must follow natural desire lines to local destinations including high streets and local centres.
Building line (see also BF2)	<p>Consistent building lines should be maintained along the length of a block, but can be set back from the pavement edge to provide external spill-out space, which could include limited visitor parking, for ground floor commercial uses. Alternatively, buildings can be built up to the back of the pavement.</p> <p>Generous pavement widths should be provided including space for street trees and seating.</p>
Height and massing (see also BF1)	<p>Predominantly 4-6 storeys (12-20m) but taller buildings may well be appropriate for waterfront sites.</p> <p>Urban block forms should be used with parapet roofs. Shallow pitched/hipped roofs are not appropriate for the pattern of development in these areas. Mansard roof forms, and set back attic storeys, may be appropriate if carefully designed.</p>
Cycle and car parking (see also SM4 and SM5)	<p>Provide a high ratio of cycle storage and parking provision, and a low to medium ratio of car parking, due to good public transport, walking and cycling connections and the desired urban development pattern.</p> <p>Cycle parking and storage for residents and employees to be provided within building envelope or within the block interior.</p> <p>Car parking to be provided within the block interior, or in basement parking. Parking should be unallocated and include provision of car club spaces.</p>
Servicing (see also SM6 and BD7)	Refuse storage to be provided within building envelope or within the block interior.
Street elevation design (see also CI4 , BD1)	<p>Elevations should have a regular rhythm, unless clearly justified by the architectural concept.</p> <p>Where non-habitable space is required due to flood risk, blank ground floor elevations must be avoided – refer to BD1 for further guidance.</p> <p>Design of waterside elevations must create a coherent and very high quality composition with a civic character which complements the historic quayside area on each side of the River Yare, creating a truly distinctive character.</p>
Boundary treatments (see also BD9)	Where buildings are set back from the pavement edge, boundary treatments must be kept below 1m in height to maintain an active frontage relationship and permeability to the street. Boundary treatments could include brick/flint walls, good quality metal railings, or planted boundaries.

Building design and materials (see also CI4)	<p>External façades should typically be well-detailed and high quality brick, flint, or traditional lime render. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Achieving the urban greening factor is likely to require the use of green roofs and climbing plants as well as landscape design.</p>
Landscape design and materials (see also CC7 , CC8 , PS1-5)	<p>Landscape design should incorporate SuDS features including rain gardens and permeable paving. New street trees that will mature to provide good canopy spread and height, should be included throughout.</p>
Other	<p>Waterfront sites must ensure public access to the full length of the waterfront creating a high quality public realm for walking and cycling, including street trees, lighting, public art. At least 10m depth of public realm is recommended along the length of the waterfront, and more generous provision is encouraged.</p> <p>Historically significant structures and buildings of quality, regardless of status as designated heritage assets, should be retained and reused if possible.</p> <p>Development near Nelson's monument must enhance the setting of the heritage asset.</p> <p>Views of the Victorian gasholder should be considered and enhanced by the placement and massing of new development.</p>

5.6 Caister-on-Sea village centre

To be read in conjunction with relevant Local Plan policies including those shown on figure 64.

This character area comprises the historic core of Caister-on-Sea, including the fishing village, 19th century and early 20th century cottages and terraces and the commercial high street. This is included as a character area due to its mixed character and historic importance. Although it lacks a formal designation of a Conservation Area or a high density of listed buildings, the area does have a distinctive character which could be eroded by unsympathetic infill development or redevelopment of sites.

Area characteristics:

- A close-knit pattern of development of narrow streets and alleys leading off the main streets (High Street/Yarmouth Road, Beach Road, Tan Lane).
- A wide variety of building styles, ages and types within an overall low-rise relatively high-density pattern, giving the streetscape variety and interest.
- Buildings are mainly cottages and short terraces with some unusual typologies, for example along Clay Road and Victoria Street, where outbuildings and private yards abut the street with the homes set back.
- Some 1920s / 1930s buildings with Art Deco features remain of good quality and in good condition.
- Several buildings by the seafront hold significant heritage value, such as the Coastguard and fishing cottages, both in terms of cultural and architectural value.
- Lanes and alleys are frequently unsurfaced, maintaining the informal fishing village character, but in some places boundary treatments are unattractive and of poor quality.
- Some 20th century and later development has not maintained the close-knit character with large setbacks and areas of front curtilage parking, and gaps between buildings resulting in less coherence to the built form and character.



Fig. 62. Map of character area



Fig. 63. Photographs of the Caister-on-sea village character area

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Minimum 30 dwellings per hectare, with higher densities up to 50 dwellings per hectare possible depending on unit type and mix. Plot ratios for mixed-use development of 1 or over.
Development pattern (see also BF1 , BF2 and BF4)	Low-rise building forms which can include short terraces, detached and semi-detached buildings, courtyard housing and mews lanes. Avoid lengthy stretches of uniform building types. Private gardens/courtyards should be kept small to maintain the close-knit low-rise character.
Building line (see also BF2)	A varied building line is acceptable with buildings set tight to the street edge or set back up to 3m. Infill development on the main streets should conform to the building line set by neighbouring development, varying by up to 1m.
Height and massing (see also BF1)	Predominantly 1-2 storeys. 3 storey development may be appropriate in locations where this does not dominate the streetscape and away from corners. Varied roof forms are acceptable, including pitched, hipped, gambrel and mansard roofs, parapets with flat or mansard roofs behind, and dormers.
Cycle and car parking (see also SM4 and SM5)	Cycle and car parking and storage must be provided on-plot. Avoid extensive front curtilage parking.
Servicing (see also SM6 and BD7)	Refuse storage to be provided within building envelope or well-integrated into the design of front gardens/yards.
Street elevation design (see also CI4 , BD1)	Elevations should be relatively simple and modest. New shopfront designs should be in accordance with the Shopfronts Design Guide
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging – all below 1m high. Where side or rear gardens or yards abut the street, they should be bounded by solid walls to 2m, in high quality materials e.g. brick or flint, or by hedging. Close boarded fencing to side or rear boundaries is not acceptable.
Building design and materials (see also CI4)	External façades should typically be well-detailed and high quality brick, flint, traditional lime render or painted brick in colours drawn from the local palette. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.
Landscape design and materials (see also CC7 , CC8 , PS1-5)	Front gardens/yards including parking, and private lanes and paths should be surfaced in permeable materials. Bound or unbound gravel surfacing to parking areas and private lanes/alleys is preferable to block paving. Planting should use species that are salt- and drought-resistant, suitable for the soil and climate of the village.

Other	Opportunities for sensitive infill and redevelopment of under-utilised sites should be supported where they mend the street line, reinforce the close-knit pattern of development, and reduce the impact of front curtilage parking on the streetscape.
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Fig. 64. Opportunities for improvement of the character area
Left: close boarded fencing to the public realm does not enhance the character of the area.
Right: parking areas onto the street detract from the overall close-knit character of the area and provide opportunities for redevelopment.

Area types

5.7 Terraced streets and squares

This area type, resulting from the 19th century expansion of Great Yarmouth and Gorleston, consists predominantly of terraced streets of various kinds, ranging from tight back-to-back terraces to more elaborate developments of the period including squares and public gardens. Some of this character area is covered by Conservation Areas (St Nicholas/Northgate Street, St George's, Prince's Road, Camperdown) which protect set-piece environments and buildings.

Area type characteristics:

- Mainly terraced housing in a gridded, back-to-back, street pattern intersected in places by historic rope walks running at diagonal angles
- Homes typically have small, or no, front yards or gardens. Where front gardens or yards exist, they are typically bounded by low brick walls or railings where they have not been converted for use as parking spaces.
- Rear gardens and yards vary, with some streets having little or no rear gardens or yards, while others have more generous rear gardens that now contribute to the overall green infrastructure of the area.
- Typically, rear alleys give access to the block interior, and in some places small greens can be found in the block interior, accessed from the street and frequently used for car parking. Due to the predominance of rear alleys, front yards/gardens are rarely used for refuse bins or cycle storage.
- Churches (contemporary to the terraced streets) and their churchyards, as well as formal parks and gardens, form strong landmarks within the street pattern. A few semi-detached homes, or larger community use buildings sit at street junctions.
- The design of street frontages ranges from plain workers housing to more ornate middle-class housing with a greater level of façade detail. Many streets are characterized by projecting bays, decoratively embellished, and many homes retain original sash windows and other features. Towards the seafront, terraces often have elegant original balconies. Plainer, flat-fronted terraces have simple well-proportioned elevations but have typically been more heavily altered.
- Areas of later development do not consistently reinforce a continuous and active street frontage and have resulted in 'left-over' areas of public space with no clear purpose, forecourt parking, and blank frontages to the street.
- Most streets have narrow pavements and lack street trees. A lack of off-street parking means that streets can be dominated by parked cars.



Fig. 65. Map indicating main areas of terraced streets and squares in Great Yarmouth and Gorleston-on-Sea. Other small areas of this character type can be found across the borough.



Fig. 66. Photographs showing the wide variety of terraces found across the borough



Fig. 67. Photographs showing some of the challenges of the terraced streets.

Top: streetscenes can become dominated by cars, and pavement parking means pavements are not accessible for all users.

Middle left: historic terraces, particularly of smaller workers housing, can be difficult to find appropriate new uses for.

Middle right: new infill development on this terraced street maintains the overall scale and roof form, but lacks the rhythm of the terraced house pattern, with shared porches and front yards meaning the houses appear to be larger linear buildings rather than terraces. The front boundary treatments and accommodation of the level change is also awkward and does not enhance the streetscape, and the windows do not have the attractive proportions of the other houses on the street

Bottom: rear alleys and yards behind terraced houses often present an uncared for appearance and garage sites provide the opportunity for sensitive infill which could provide upper floor living space while retaining parking where needed.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Dependent on the location, typically 50 dwellings per hectare for residential-led development, with the expectation of higher densities of up to 100dph. In some areas, lower densities of 35-50 dwellings per hectare may be appropriate. Plot ratios for mixed-use development of 2 or over.
Development pattern (see also BF1 , BF2 and BF4)	Low-rise high-density terraces with unbroken street frontages. Development should reinforce the strong character of this area type and avoid infill development that dilutes the terraced pattern.
Building line (see also BF2)	Maintain the building line set by existing adjacent buildings to ensure streets continue to have a consistent appearance. Commercial development must also maintain the prevailing building line and should not be set back behind parking. Variation from the building line of adjoining buildings should be under 1m. On street-facing elevations, balconies should be inset not projecting.
Height and massing (see also BF1)	Terraces vary from 2-5 storeys. Height of new development should match that of surrounding buildings, or add one additional storey. On larger sites, greater variance in height may be acceptable but must be shown to sit comfortably within the townscape without extensive visible flank walls. Varied roof forms are acceptable, including pitched, hipped, and mansard roofs, parapets with flat or mansard roofs behind, and dormers. Roof forms should predominantly match neighbouring building types unless a clear design rationale is presented for an alternative approach.
Cycle and car parking (see also SM4 and SM5)	Cycle storage and parking should either be integrated into the design of front garden/yard space; within the building envelope; or within storage accessible directly from rear alleys (where present). Car parking must not be provided within front curtilage areas.
Servicing (see also SM6 and BD7)	Refuse storage should either be integrated into the design of front garden/yard space; within the building envelope; or within storage accessible directly from rear alleys (where present). Avoid creating new rear alleyways. Refuse containers must have dedicated enclosed storage so they are concealed from view.
Street elevation design (see also CI4 , BD1)	Elevations should follow a rhythmic pattern and broadly vertical proportions. Bay windows and ornamental detailing can assist in creating attractive and contextually sympathetic elevations.
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket fencing, metal railings or native hedging – all below 1m high. Side and rear garden boundaries to streets or rear alleyways should be bounded by solid walls to 2m, in high quality materials e.g. brick or flint, or by hedging. Close boarded fencing to side or rear boundaries to the public realm, including alleyways, is not acceptable.

Building design and materials (see also CI4)	External façades should typically be well-detailed and high quality brick, flint, traditional lime render or painted brick in colours drawn from the local palette. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.
Landscape design and materials (see also CC7 , CC8 , PS1-5)	Landscape design should incorporate SuDS features and all parking areas should use permeable paving. Additional street planting, of trees that will mature to provide good canopy spread and height, should be included where possible.
Other	Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals. Improvements to the quality of rear alleys and publicly accessible greens/courtyards in the block interior should be sought, to regularize the layout of parking, improve safety, add tree planting and create opportunities for functional use of the public realm.

5.8 Interwar housing estates

This area type comprises housing developed by both private developers and local councils, in rural and suburban settings. It includes the so-called 'homes fit for heroes' built to address housing shortages after World War 1, as well as speculative development along 'garden city' design principles. Development within these estates is generally limited to small infill sites, on-plot replacement dwellings and upgrading of properties for energy efficiency.

Area type characteristics:

- Spacious cottage estate layouts of semi-detached and short terrace forms.
- Generous gardens to front and rear, typically larger in villages than the towns.
- Simple house plans with good room sizes, adaptable and extendable.
- Typically generous setbacks from the street which now often accommodate front curtilage parking. Low rise walls to front garden and many street facing windows gives these streets a safe presence, 'active surveillance'
- Attractive mature planting in some areas including street trees, although others suffer from a poor quality streetscape.
- Many estates have attractive period detailing drawing on Arts and Crafts and Art Deco/ Moderne influences, including decorative brickwork, arched openings to porches and front doors, catslide roofs, bay windows and dormers. Simpler estates still have good proportions, generous window sizes and plain but well-built character.
- External elevations are typically red or brown brick or render, with hung tile or timber weatherboarding to features. Roofs are typically plain tile or slate.
- Higher density estates, such as in Great Yarmouth town, sometimes have narrower roads and pavements resulting in issues of on-street parking (sometimes on pavement parking) and bins.
- Parking and bin issues are less pronounced where pavements and roads are wider.



Fig. 68. Photographs of interwar housing estates. Left: example showing attractive mature hedges and planting and well-proportioned homes. Right: some estates have a poor quality public realm with few street trees and dominant highways.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Dependent on the location, densities of 30-50 dwellings per hectare are expected. Higher densities may be appropriate for larger sites and/ or development that predominantly comprises apartments. Plot ratios for mixed-use development of 1 or over.
Development pattern (see also BF1 , BF2 and BF4)	Street-based pattern predominantly comprising terraced and semi-detached buildings. In some locations, backland development can be an appropriate way to create additional homes within existing neighbourhoods.
Building line (see also BF2)	Buildings should be set back behind well-landscaped front gardens (residential) or parking (commercial/mixed-use). Maintain the building line set by existing adjacent buildings to ensure streets continue to have a consistent appearance. Commercial development must also maintain the prevailing building line. Variation from the building line of adjoining buildings should be 1-2m.
Height and massing (see also BF1)	2-3 storey development predominantly. 4 storey massing may be acceptable in certain locations subject to very careful consideration of design. Single-storey new development is not appropriate. Varied roof forms are acceptable, including pitched, hipped, and mansard roofs, parapets with flat or mansard roofs behind, and dormers. Roof forms should predominantly match neighbouring building types unless a clear design rationale is presented for an alternative approach.
Cycle and car parking (see also SM4 and SM5)	Cycle storage and parking should either be integrated into the design of front curtilage areas or within the building envelope. Parking can be provided within front curtilage areas but must be well screened by landscaped boundary treatments.
Servicing (see also SM6 and BD7)	Refuse storage should be integrated into the design of front garden/ yard space; or provided within the building envelope.
Street elevation design (see also CI4 , BD1)	Elevations should have a regular rhythm unless clearly justified by the architectural concept. Bay windows and carefully designed ornamental detailing can assist in creating attractive and distinctive character.
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket fencing, metal railings or native hedging – all below 1m high. Side and rear garden boundaries to streets or rear alleyways should be bounded by solid walls to 2m, in high quality materials e.g. brick or flint, or by hedging. Close boarded fencing to side or rear boundaries visible from the public realm is not acceptable.
Building design and materials (see also CI4)	External façades should typically be well-detailed and high quality brick, flint, or hung tile. Timber weatherboarding may also be appropriate. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.

Landscape design and materials (see also CC7, CC8, PS1-5)	<p>Landscape design should incorporate SuDS features and all parking areas should use permeable paving. Additional street trees that will mature to provide good canopy spread and height, should be included where possible. New gardens should include trees.</p> <p>Front gardens should be mostly soft landscaped, with limited paved surfaces. Where existing front gardens are proposed for conversion to parking, this is only appropriate when the majority of the garden will remain soft landscaped and there will be no loss of trees.</p>
Other	<p>Development should enable improvement of the public realm through inclusion of SuDS, seating, informal natural play and biodiverse planting.</p> <p>Upgrades to the energy performance of existing buildings should be consistent along a street or group of homes</p>



Fig. 69. Examples of interwar estates around the borough. Some have attractive leafy landscaping but others lack street trees and corners have under-used public realm which could be improved by tree planting, public realm improvements such as seating and ‘play on the way’, and sensitive infill development that could enclose the corner with a continuous built frontage.

5.9 Postwar housing estates

This area type comprises estate housing developed by both private developers and local councils, from World War 2 up to the present day. Estates range widely in style but each has a distinctive character and pattern of development. Development within these estates is generally limited to small infill sites, redevelopment of garage sites and under-utilised 'left over' spaces, on-plot replacement dwellings and upgrading of properties for energy efficiency.

Area type characteristics:

- Most post-war estates take low-density patterns of development made up of semi-detached and detached houses, with spacious front and back gardens.
- Layouts are frequently arranged around curving streets and include a high proportion of cul-de-sacs. In some cases this results in a lack of legibility to the street layout, a lack of connectivity along natural desire line routes to local destinations, and awkward relationships between buildings and the public realm.
- Estates include both two-storey and bungalow (1-storey or 1.5 storey) development. 3 storey development is rarely found.
- The quality and function of public open spaces is mixed with many estates including indeterminate green spaces which are not well used either functionally nor for biodiversity. Some estates have good mature street trees/planting while others lack any canopy cover and have sterile grass verges.
- The layout and type of parking on some estates, including garage blocks and parking courts, frequently create blank flank walls and lack of active frontages / natural surveillance to the public realm.
- Materials, styles and details vary between estates. Some estates, particularly from the 1950s-1970s, have characterful and attractive original details and features which add to their coherence and distinctiveness. Others comprise a range of house types on a single street or estate, with little overall coherence, and extensions and alterations have further eroded the design identity of the estate as a whole. In the more attractive estates, their coherence and quality usually derives from the use of a more limited palette, typically brick with other materials used for details or features only.



Fig. 70. Postwar estates are hugely varied and include attractive, relatively compact 1950s social housing and very low-density estates drawing on American suburban models.



Fig. 71. Examples of the opportunities and challenges posed by postwar estates. Typically very low-density, they often lack good street trees and while they benefit from very wide streets and expansive verges, these are sterile, lacking trees or biodiverse planting, and do not offer residents spaces to play or socialise. Some estate layouts present flank walls to the street and lack natural overlooking. Boundary treatments to the side and rear of dwellings often face streets and can create lengthy blank frontages. There is the opportunity for 'gentle densification through infill and adaptation which does not need to compromise the character of these often well-loved neighbourhoods.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Dependent on the location, densities of 30-40 dwellings per hectare are expected. Plot ratios for mixed-use development of 1 or over.
Development pattern (see also BF1 , BF2 and BF4)	Infill development should reinforce a legible street pattern fronted by detached and semi-detached buildings, and short terraces. In some locations, tandem (backland) development can be an appropriate way to create additional homes within existing neighbourhoods and this may take a range of forms.
Building line (see also BF2)	Buildings should be set back behind well-landscaped front gardens (residential) or parking (commercial/mixed-use). Maintain the building line set by existing adjacent buildings to ensure streets continue to have a consistent appearance. Commercial development must also maintain the prevailing building line. Variation from the building line of adjoining buildings should be 1-2m.
Height and massing (see also BF1)	2-3 storey development predominantly. 4 storey development may be acceptable in certain locations. Single-storey new development is not appropriate. Where replacement dwellings are proposed, the new dwelling may be up to 1 storey taller than the building it replaces, unless daylight, sunlight and privacy of neighbouring homes and gardens will be impacted to an unacceptable degree.
Cycle and car parking (see also SM4 and SM5)	Cycle storage and parking should either be integrated into the design of front curtilage areas or within the building envelope. Parking can be provided within front curtilage areas but must be well screened by landscaped boundary treatments. Where garages are provided (integrated or detached), these must not be set forward of the general building line.
Servicing (see also SM6 and BD7)	Refuse storage should be integrated into the design of front garden/yard space; or provided within the building envelope.
Street elevation design (see also CI4 , BD1)	Development and redevelopment within existing estates should form active frontages to streets and open spaces and provide natural overlooking to the public realm.
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging or planting – all below 1m high. Side and rear garden boundaries to the public realm should be bounded by native hedging, post and rail fences or solid masonry walls. Close boarded fencing to exposed side or rear boundaries is not acceptable.
Building design and materials (see also CI4)	Materials should be sympathetic to the specific estate within which the site is located and design should be used to create an integrated and coherent appearance to the street.

<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Landscape design should incorporate SuDS features and all parking areas should use permeable paving.</p> <p>Additional street trees that will mature to provide good canopy spread and height, should be included where possible. New gardens should include trees.</p> <p>Front gardens should be mostly soft landscaped, with limited paved surfaces. Where existing front gardens are proposed for conversion to parking, this is only appropriate when the majority of the garden will remain soft landscaped and there will be no loss of trees.</p>
<p>Other</p>	<p>Development should enable improvement of the public realm through inclusion of SuDS, seating, informal natural play and biodiverse planting.</p> <p>Upgrades to the energy performance of existing buildings should be consistent along a street or group of homes</p>

5.10 Historic village centres

This area type comprises the historic cores of the rural villages, predominantly made up of organic development up to the early 20th century. Historic villages centres are mostly covered by conservation areas except for Scratby, Ormesby St Michael, Filby, Mautby, and Fritton, but the latter do still have attractive informal village centres and these fall into this area type.

Development proposals in this area type are limited to small infill development, on-plot replacement dwellings, extensions and upgrades to properties to improve energy efficiency.

Area type characteristics:

- Historic villages usually developed around generous green or cross-roads with gradual, but relatively limited, linear development of cottages and short terraces along lanes and narrow alleyways.
- The village centres often include a range of current and former places of worship reflecting the varied nature of denominations in this part of Norfolk and the history of non-conformism
- There is little industrial development or building types but some workshops and associated yards
- The development pattern is irregular and informal comprising cottages and buildings of a range of ages and styles, but typically unified by the use of locally prevalent building materials, including brick, flint and stone with some timber weatherboarding and lime render. Roofs are almost all pantiled with some use of plain tile and slate.
- Most buildings have attractive but small-scale proportions and plain detailing. Internal storey heights are usually considerably lower than can be accepted in new-build development which leads to some challenges where new proposals aim to replicate historic neighbouring precedents.
- Smaller lanes and alleyways can be unsurfaced which contributes to their informal rural character.
- Boundary treatments are typically low and informal, and front gardens are well-planted.



Fig. 72. Examples of typical historic village centres in the borough.



Fig. 73. Examples of the charm and challenges of the rural villages. The organic pattern of development has resulted in a wide range of building types and styles, many originally designed as places of work, study or religion but now adapted to residential use.

Bottom left: well-detailed and sensitively designed infill housing successfully follows a clustered traditional pattern of cottage development with low boundary walls and parking carefully concealed.

Bottom right: new development does not always successfully create village 'greens' and other rural development patterns, as can be seen here, where homes are set too far back and boundary treatments are poor.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	<p>Minimum 30dph within historic village centres which fall within Belton, Hemsby, Hopton-on-Sea, Martham, Ormesby St Margaret and Winterton.</p> <p>Within other historic village centres, residential densities should be a minimum of 20 dph.</p> <p>Plot ratios for mixed-use development of 1 or over.</p>
Development pattern (see also BF1 , BF2 and BF4)	<p>Informal pattern of streets, greens, alleys and yards/courts. Buildings can be detached, semi-detached or in short terraces. Scale of buildings should be carefully considered in relation to the scale of the site/plot. Larger new detached homes should be sited on larger plots with sufficient landscaping, while smaller dwellings can form a more compact pattern of development with small courtyard gardens making better use of land.</p>
Building line (see also BF2)	<p>A varied building line is acceptable with buildings set tight to the street edge or set back. The building line and development patterns should be site-specific and justified by close analysis of the surrounding context.</p>
Height and massing (see also BF1)	<p>Predominantly 1-2 storeys. 3 storey development may be appropriate in locations where this does not dominate the streetscape and away from corners.</p> <p>Roofs should be predominantly pitched, hipped, gambrel and mansard roofs. Flat roofed buildings may be appropriate for commercial or mixed-used development, or small apartment buildings, with careful design in relation to the site context.</p>
Cycle and car parking (see also SM4 and SM5)	<p>Cycle and car parking and storage must be provided on-plot. Avoid extensive front curtilage parking.</p>
Servicing (see also SM6 and BD7)	<p>Refuse storage to be provided within building envelope or well-integrated into the design of front gardens/yards.</p>
Street elevation design (see also CI4 , BD1)	<p>Elevations should have relatively simple detailing and use of materials, well-proportioned openings and provide natural overlooking of the public realm.</p>
Boundary treatments (see also BD9)	<p>Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging – all below 1m high. Where side or rear gardens or yards abut the street, they should be bounded by solid walls to 2m, in high quality materials e.g. brick or flint, or by hedging. Close boarded fencing to exposed side or rear boundaries is not acceptable.</p>
Building design and materials (see also CI4)	<p>External façades should typically be well-detailed and high quality brick, flint, traditional lime render or painted brick in colours drawn from the local palette. Timber weatherboarding may also be appropriate. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>

<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Landscape design should incorporate SuDS features and all parking areas should use permeable paving.</p> <p>New gardens, and parking areas servicing commercial development, should include trees.</p> <p>Front gardens should be mostly soft landscaped, with limited paved surfaces. Where existing front gardens are proposed for conversion to parking, this is only appropriate when the majority of the garden will remain soft landscaped and there will be no loss of trees.</p> <p>Bound or unbound gravel surfacing to parking areas and private lanes/ alleyways is preferable to block paving.</p>
<p>Other</p>	<p>Maintain and enhance the character of the emerging Conservation Areas in line with the emerging Conservation Area Appraisals.</p>

5.11 Plotlands

Great Yarmouth includes a number of 'plotland' developments which originally grew up on marginal land in mostly seafront locations. Many are now threatened by coastal erosion and/or sea level rise but some remain well-loved and distinctive neighbourhoods with an unusual pattern and character. Some plotland areas now lie within coastal change management areas. Development proposals within this area type are typically small-scale infill development, on-plot replacement dwellings, extensions and alterations.

Area type characteristics:

- Distinctive typology of strongly gridded or geometric street and plot layout containing unique and varied self-build homes
- Typically low-density although some have a medium-density character due to small garden sizes.
- Access lanes are often unsurfaced, with informal, low-level boundary treatments
- Homes are typically chalet-style with gabled roofs to the street, with no repetition of house types along a street or within a plotlands area, due to the self-built nature of the original development. Homes are typically set back from the street or access lane and many have porches.
- Homes are all 1-2 storeys with few 3 storey homes.



Fig. 74. Photographs of plotlands at Scratby.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Minimum 30 dwellings per hectare. Plot ratios for mixed-use development of 1 or over.
Development pattern (see also BF1 , BF2 and BF4)	Gridded street and plot pattern of detached homes on relatively small sized plots
Building line (see also BF2)	Buildings should be set back from the street and vary no more than 1m from the frontage line of neighbouring buildings.
Height and massing (see also BF1)	Predominantly 1-2 storeys. 3 storey development may be appropriate in locations where this does not dominate the streetscape and away from corners. Predominantly chalet-style forms with gabled roofs to the street, but a wide variety of building forms is encouraged. Uniformity of building design must be avoided, where a group of new homes or buildings is proposed.
Cycle and car parking (see also SM4 and SM5)	Cycle and car parking and storage must be provided on-plot.
Servicing (see also SM6 and BD7)	Refuse storage to be provided within front gardens/yards.
Street elevation design (see also CI4 , BD1)	Varied and individual design approaches are encouraged.
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging – all below 1m high. Where side or rear gardens or yards abut the street, they should be bounded by hedging, post-and-rail fencing, or solid walls to 2m, in high quality materials e.g. brick or flint. Close boarded fencing to exposed side or rear boundaries is not acceptable.
Building design and materials (see also CI4)	Varied materials are acceptable and encouraged.

<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Landscape design should incorporate SuDS features and all parking areas should use permeable paving.</p> <p>New gardens, and parking areas servicing commercial development, should include trees.</p> <p>Front gardens should be mostly soft landscaped, with limited paved surfaces. Where existing front gardens are proposed for conversion to parking, this is only appropriate when the majority of the garden will remain soft landscaped and there will be no loss of trees.</p> <p>Bound or unbound gravel surfacing to parking areas is preferable to block paving.</p>
<p>Other</p>	<p>Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals.</p> <p>Improvements to the quality of rear alleys and publicly accessible greens/courtyards in the block interior should be sought, to regularize the layout of parking, improve safety, add tree planting and create opportunities for functional use of the public realm.</p>

6 Design requirements by development type

6.1 New housing developments

New large-scale housing developments on the outskirts of existing settlements pose specific challenges and require careful design in order to create active and characterful communities.

The borough-wide requirements of the Design Code set out how new developments should be designed in detail, including building form, materials and details. The following points capture some of the priorities for new larger developments in terms of masterplanning and integration with context.

Relationship to landscape

- New housing developments are highly visible in the landscape. Layout and design should ensure they form a positive backdrop to views and in particular that boundary treatments to the edge of developments have a rural character. Fronting new development onto the landscape is not typical in rural settings and it is preferable for rear gardens to form the boundary to the rural landscape around the development. The use of close boarded fencing on to the landscape should be avoided, instead natural boundary treatments should be used. Walking and cycling routes should provide permeability to the landscape beyond as well as views out from the development to the rural landscape.
- The layout of new development should frame views of the open landscape beyond and link to the rural footpath network. Where possible, development should create new public rights of way that strengthen the footpath network and encourage appropriate active recreational use of the countryside.

Integration with 'host' community

- The layout of developments should integrate seamlessly with the network of streets and routes into the 'host' community and towards local destinations. These routes should be intuitive and direct, and create as much permeability for pedestrians and cyclists as possible, while preventing unwanted vehicle movement.
- Layouts should site functional public open space – including play and recreational facilities - in locations where it can be easily accessed by existing and new residents. Accessible natural greenspace should also be located where it can be used by the wider community.
- Larger developments which include local services and other non-residential uses should also site these to form natural meeting points between existing and new residents, and these should be designed to be high quality landmark buildings.

Pattern of development

- Development should draw on the built and landscape character of the 'host' community and avoid generic layouts and house types.
- In larger developments, individual streets or sub-areas should have differentiated characters which can be achieved through the use of different approaches to layout, house designs, or variation in materials and details. The aim should be to articulate a design identity for each street or cluster, through planned and coherent design.

- In urban settings, corner buildings may often be the more prominent and taller elements in the streetscape. However, in vernacular rural settings, corner buildings are rarely dominant and more substantial buildings typically form part of a continuous street frontage, are set back within grounds, or form a block to themselves. Corners should be carefully designed to work with the wider character of the development.

Phasing

- Phased development should ensure that green infrastructure and functional walking and cycling routes are built as early as possible in order to build in active lifestyles and encourage active travel for new residents from the start.



Fig. 75. Examples of common issues in new estate design in Great Yarmouth.

Top left: Close boarded fencing presents an unattractive edge to the open countryside.

Top right: Lack of street trees and areas of green verge which are not designed to allow for active uses such as play, seating, recreation. Extensive blank flank walls to the public realm should be avoided.

Bottom left: A lack of planting and street trees make new development bland and lacking in a distinctive identity; streets ending in close boarded fencing at the rear of adjoining gardens is unattractive and does not create permeability for pedestrians and cyclist; visible meter boxes detract from the quality of the streetscene; yellow brick is not typical of the local area.

Bottom right: rear parking areas are not well overlooked or sympathetically landscaped, making what could be a street fronted by dwellings into a 'dead space' only used by cars. Boundary wall is good quality and could be appropriate for a short length of boundary treatment, but not for a long boundary onto a public route.



Fig. 76. Examples of successful new-build housing development.

Top left: a contemporary reinterpretation of terraced cottages enlivened by imaginative use of local materials in Peterborough.

Top right: Well-landscaped public realm with trees complements contemporary housing at Accordia, Cambridge.

Middle left: varied roofscapes make simple forms lively, and brick enclosures successfully conceal refuse storage and air source heat pumps at St Chad's Thurrock.

Middle right: single-storey homes for the elderly create an attractive square enlivened by expressive chimneys at Barking. Architect: Patel Taylor. Bottom left: traditional terraces provide a good precedent for simple town housing at Vassal Road, London.

Bottom right: new housing with a lively use of materials and scale at New Hall, Harlow.

6.2 Infill development/redevelopment

Infill development and redevelopment of existing plots can make an important contribution to increasing the stock of homes in locations which already have good public transport, walking and cycling links, and can help sustain the viability of local shops and services.

The borough-wide requirements of the Design Code set out the standards that infill development should meet, and the area specific design requirements must also be followed. The following points capture some of the most important design considerations for infill development in terms of site planning and integration with context..

Making best use of land

- Infill development should take the opportunity to gently densify neighbourhoods without substantially altering their character. Creative site layouts, unit layouts and design of amenity space should be used to create backland and mews development which does not compromise the privacy and daylight/sunlight of neighbouring properties.
- Careful massing and roof form should be used to minimise the visual bulk of proposals. Daylight and sunlight modelling should be used at an early stage to inform the design and layout.

Relationship to adjacent properties and local character

- Building lines, external materials and the approach to boundary treatments must strictly follow the requirements set out for the character area. Adjacent properties may not form a suitable precedent if they are not of good quality design.
- Infill development is an opportunity to enhance and increase the distinctive character of a neighbourhood. Generic design approaches should be avoided and care taken to create elevations that are well-detailed, use durable and high quality materials, and complement the best examples from the wider area.

Landscaping

- The requirement to provide adequate parking can lead to sterile front curtilage areas in front of infill development. Front curtilage parking must include green features such as substantial trees, planting, and green roofs or climbing plants on carports and cycle shelters.
- Landscaping must maximise the use of SuDS features throughout. Permeable surfacing is expected for all on-plot parking.



Fig. 77. Examples of infill development where new development reinforces the scale, setback and active frontage of the street with parking provided to the rear, although choice of brick does not reflect the local material palette.

6.3 New industrial, commercial and retail development

Industrial, commercial and retail development fulfils important functions but, in out-of-town locations in particular, frequently fails to contribute positively to the character of the local area.

The borough-wide requirements of the Design Code set out design standards which apply to all forms of development. The following points capture some of the most important design considerations for out-of-town commercial development in terms of site planning and integration with context.

Site planning:

- Non-residential development should also follow sound masterplan principles and create a legible layout of streets and movement routes with a clear relationship to the active frontages of buildings. A perimeter block approach will typically be more successful in creating a sense of safety, enclosure and legibility than isolated buildings within parking.

Landscape design:

- Non-residential development generates a large car parking requirement and this must be designed to maximise the greening and SuDS opportunities. Tree planting should specify species that will grow to provide substantial canopy shade and be climate-resilient; permeable paving should be used; and all opportunities for introducing planting and biodiversity must be taken.
- Boundary treatments of non-residential development should use greening, such as climbing plants, to soften the visual impact of security fencing and to increase biodiversity on the site.
- Where external lighting is required, this should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.

6.4 Development in the rural area

A wide range of development takes place within the rural area, ranging from agricultural structures; farm diversification; business units; tourism; agricultural-to-residential conversions; and reuse of historic and listed buildings. While some forms of development can take place within permitted development rights, others require full planning permission, listed building consent or other consents.

The landscape of Great Yarmouth is open and relatively flat, so buildings and settlements are visible from long distances and even those of relatively modest scale form landmarks. The impact of rural development can substantially alter the landscape character.

The borough-wide requirements of the Design Code apply to development within the rural area and the following points capture some of the priorities in terms of integration with context.

Landscape setting:

- Long-range views must be considered and visualisations of proposals in context from publicly accessible viewpoints in the wider area submitted.
- Boundary treatments, and the incursion of domestic curtilages into the countryside, are highly visible due to the character of the local landscape. Soft boundary treatments such as timber post and rail fencing, native hedging and including tree planting where possible, should be used and close boarded fencing is not acceptable.

Building design and materials:

- Rural development should carefully consider materials, form and massing to maintain an agricultural and farmstead design language. Simple pitched-roof building forms are preferred.
- Materials should be predominantly good quality brick, flint or stone; timber weatherboarding; or profiled metal cladding in natural and darker tones. Light coloured materials are highly visible against the landscape and should be used with care.

Landscape design:

- Car parking areas can be highly visible within the rural area due to the long views. Parking areas must be very well landscaped and include trees which will, when mature, provide excellent canopy cover and shade.
- Where external lighting is required, this should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.



Fig. 78. Left: Harsh boundary treatments to isolated homes would be better designed as soft hedges or post and rail fencing, or low height wall. Right: new home in Lincolnshire is unobtrusive in the landscape and has a low boundary wall. Architect: Caruso St John.

6.5 Holiday Parks

Holiday park development forms an important part of the local economy. However these areas are typically situated close to significant natural landscape locations, therefore issues with these areas are primarily around boundary treatments to surrounding context and landscape.

The borough-wide requirements of the Design Code apply to holiday park development, where relevant based on siting and context, and the following points capture some of the priorities in terms of masterplanning and integration with context.

Landscape setting:

- Minimise recreational disturbance to natural wildlife/landscape locations through the design of the movement network/connection to green spaces as well as provision of suitable alternative natural green spaces for recreation.
- Ensure boundary treatments create a positive and attractive frontage to streets and to the countryside. Close boarded fencing is not appropriate for boundary treatments visible from the surrounding countryside or the public realm. Static caravans and lodges must be well-screened from public view points and the view from neighbouring homes and rights of way should be enhanced by extensive on-site landscaping
- External lighting should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.



Fig. 79. Examples of different boundary treatments to holiday parks.

Top left: the timber fence is less obtrusive than a tall close-boarded fence, but does not help to soften the boundary as the hedge does.

Top right: some holiday parks work well without a secure boundary treatment.

Bottom: due to the wide flat landscapes, holiday parks can be seen from long distances even though they are generally only single storey. Tree planting of large-scale trees would help to soften and screen the visual impact

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14	1888 Ordnance Survey Map	Reproduced with the permission of the National Library of Scotland
15	1949 Ordnance Survey map	Reproduced with the permission of the National Library of Scotland
19	Marmalade Lane	Mole Architects
19	Gt Kneighton	Proctor Matthews Architects
22	Hillington Square	Mae Architects
24	Leiwen, Netherlands	Wikimedia Commons
24	St Andrews Park, Uxbridge	Allen Pyke Associates
24	Grey to Green, Sheffield	Nigel Dunnett
24	Derby SuDS	Illman Young
24		Natural England GI Framework
24	East Lothian SuDS	East Lothian District Council
28	Brentwood School	Cottrell and Vermeulen
28	Ely Museum	HAT Projects / Philip Vile
28	Hunsett Mill	Acme
29	Great Kneighton and New Hall aerials	Google Earth Studio
31	Tibby's Yard	Ash Sakula
31	Great Kneighton	Proctor Matthews
31	Molenplein	Tony Fretton
31	Walberswick House	Dow Jones
31	Pewsey housing	Tony Fretton
33	Diagram of street hierarchy	National Model Design Code

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34	New Hall, Harlow	https://thelandscape.org/2014/09/07/the-search-for-good-design-part-1/
35	Eastcote High Street	Steer and Project Centre
35	Floating bus stop	https://www.cycling-embassy.org.uk/dictionary/floating-bus-stop
36	Eddington housing	Mole Architects
37	Vauban	
37	Eddington	
38	Great Kneighton	Proctor Matthews
39	Great Kneighton	Proctor Matthews
41	Marmalade Lane	Mole Architects
41	Van Gogh Walk	
41	Woonerf Street	
41	Lime Tree Square	
41	Great Kneighton	Proctor Matthews
42	Edinburgh cycle store	
42	Cycle store with green roof	
44	On-street SuDS	CIRIA SuDS Manual
44	Greenhithe street	
44	Lacuna, West Malling	
44	The Channels, Chelmsford	JTP
46	Carrowbreck Meadow	
46	The Avenue, Saffron Walden	
47	St Chad's Thurrock	Bell Phillips
47	Granville Estate	PTEa
48	Bristol Waterfront	
48	Green SuDS example	CIRIA SuDS Manual
50	Walthamstow street	
50	Great Kneighton	Proctor Matthews
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50	Paris street	
50	Eddington	AECOM / Tim Crocker
50	Elephant Park	
51	Salamanca Farm	A Squared
51	Goldsmith Street	Mikhail Riches
52	Public/private space diagram	National Model Design Code
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53	Goldsmith Street	Mikhail Riches
53	The Channels, Chelmsford	JTP
55	Diagrams of density and plot coverage	National Model Design Code
59	Silchester Estate	Haworth Tompkins

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61	Exhibition Mews, Whitehaven	Ash Sakula
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62	Great Kneighton	Proctor Matthews
115	Icon Street, Somerset	Feilden Clegg Bradley Studios
115	Accordia Sky Villas	Alison Brooks Architects
115	St Chad's Thurrock	Bell Phillips
115	Courtyard Housing	Patel Taylor
115	Vassall Road Housing	Tony Fretton Architects
115	Abode, New Hall	Proctor Matthews
118	Lincolnshire housing	Caruso St John

Consultation Statement

Great Yarmouth Borough- Wide Design Code

Supplementary Planning Document

January 2024



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1. Introduction

This document provides a summary of the consultation undertaken on the Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) under Regulation 12 of the Town and County Planning (Local Planning) Regulations 2012 (as amended). It provides the information required under Regulation 12 and 13 of the above-mentioned regulations. The document sets out:

- Which bodies and persons the local planning authority invited to make representations under regulation 12,
- How those bodies and persons were invited to make representations under regulation 12,
- A summary of the main issues raised by the representations made pursuant to regulation 12,
- How these representations have been taken into account in the production of the Final Draft SPD

The Great Yarmouth Borough-Wide Design Code was subject to continuous ‘informal’ consultation throughout its initial preparation to inform a ‘final draft’ supplementary planning document between September 2022 and May 2023.

This was conducted in accordance with the Council’s adopted Statement of Community Involvement (SCI), whereby the Council targeted specific groups and stakeholders with, and a vested interest in, the development of the built environment in the borough. This involved facilitating meetings and workshops with external stakeholders to shape the code’s core principles and detailed design guidance.

The range of workshops and meetings elicited a breadth of views and design considerations, and have been summarised, together with how they were addressed in the preparation of the ‘final draft’ supplementary planning document, in Section 2 of this consultation statement.

The final draft SPD was subject to a formal public consultation between 14th July 2023 and 8th September 2023. This public consultation was also extended by a further 4 weeks, officially closing on 13th October 2023.

In accordance with the Council’s adopted Statement of Community Involvement (SCI), direct notification of the formal public consultation was sent to:

- All Local Members
- Statutory and General Consultees on our Local Plan consultation database

A press release for the consultation was issued and articles advertising the public consultation, and its additional extension, were published in the Great Yarmouth Mercury. These articles can be accessed below:

- <https://www.greatyarmouthmercury.co.uk/news/23680947.say-future-great-yarmouth-developments/>
- <https://www.greatyarmouthmercury.co.uk/news/23777726.great-yarmouth-future-planning-framework-seeks-public-views/>

The SPD was available online and hard copies were available for inspection at the Town Hall, Hall Plain, Great Yarmouth, NR30 2QF throughout the duration of the public consultation period.

Hard copies of the SPD were also provided at all the local libraries within the borough for the duration of the extended public consultation period.

Comments to the consultation were accepted via post to Great Yarmouth Town Hall, or email to localplan@great-yarmouth.gov.uk.

During the final draft public consultation, 28 responses were received from individuals or organisations. These responses have been reproduced in Appendix 1. The main issues raised in the response, together with how they have been addressed in the preparation of the final version of the SPD is set out under Section 3 of this consultation statement.

The preparation of the Great Yarmouth Borough-Wide Design Code SPD was also guided throughout with the assistance of regular design code 'steering group', in partnership with officers from the Council's planning and conservation department, the Highways Authority, Lead Local Flooding Authority, Historic England and representatives from Norfolk County Council's Natural Environment Team.

2. Initial Consultation: Summary of main issues raised and how they have been addressed

This section summarises the main issues raised at each external meeting/workshop, setting out how they have been taken into account in the production of the Draft SPD.

Developer and Agents Forum – 14 October 2022

Summary of main issues raised

- Design Code should be tested for viability.
- Highways (NCC) is the main barrier to raising design quality – causing delays and demanding poor design solutions such as wide radius corners, footway crossings not on desire lines.
- Adoption of trees, SuDS, on-street parking is a challenge leading to too many parking courts.
- Difficult to find consultants with good skills in integrating SuDS, highways requirements and biodiversity.
- Welcome NDSS as standard but room sizes should not be specified as too much detail.
- Rear garden dimensions should be carefully considered so they are deliverable and compatible with density assumptions.

How issues have been addressed

- Discussions have been held with NCC Highways and the LLFA regarding design of highways and SuDS features – their feedback has been incorporated into the draft Design Code.
- NDSS and garden size guidance is included in the Design Code.
- Viability testing in detail is outside scope but the code follows best practice from elsewhere.

Active Norfolk Meeting – 22 November 2022

Summary of main issues raised

- Healthy Streets awareness should be raised.
- Design should prioritise the prevention of poor infrastructure (e.g., layouts not conducive to active lifestyles) rather than looking to compensate with activity equipment.
- Concern around the viability of development being an excuse for good quality design being avoided.
- Briefing on demographic and health inequalities within the borough given, highlighting that seafronts are not always used by residents, some of whom have never been to the beach despite living close by.
- References given to various sources of guidance produced by Active Norfolk and other related bodies.
- Desire for impactful measures not generic guidance.

How issues have been addressed

- All the main issues raised have been incorporated into the Design Code.
- Some matters raised are outside the scope of the Design Code – it is not possible to stipulate extremely detailed requirements or specific measures to be included within sites.

Natural England Meeting – 25 November 2022

Summary of main Issues Raised

- Importance of connecting people with nature for mental health.
- Design code should highlight opportunities for multi-functional green spaces and greening of building fabric e.g., roofs, walls.
- Reference new Green Infrastructure standards to be published by Natural England in January.
- Blue as well as green infrastructure to be considered.

- Trees guidance in the design code should emphasise importance of right tree for the climate, location, scale etc.
- Recreational disturbance of natural greenspace near holiday parks is a concern, design code should highlight requirement to control this and provide suitable alternative natural green-space.
- Disturbance is generally an issue from new development.
- Importance of linking and joining up habitats.
- Phased developments should consider what happens to land allocated for future phases as an 'interim' habitat.

How the issues have been addressed

- All the issues raised have been incorporated into the draft Design Code.

Parish Council Workshop – 28 November 2022

Summary of main issues raised

- Accessibility and connectivity of footpaths should be highlighted – connecting together rather than dead-ends.
- Concern around design of extensions and garage conversions which lead to parking on-street or on pavements.
- Concern generally around pavement and antisocial parking.
- Electric car charging should be included.
- Highways issues.
- A number of matters raised about specific developments that have already been constructed in terms of poor practice and design.

How the issues have been addressed

- All matters raised have been addressed in the Design Code, apart from matters falling within permitted development which is out of scope.

Great Yarmouth Civic Society Meeting – 29 November 2022

Summary of main issues raised

- Concern around town wall setting.
- Concern that historic town centre has been ruined by shopping centre developments.
- Issues with viability leading to poor quality or lack of development/redevelopment of sites.
- Local list of non-designated assets currently in discussion with Council.
- More trees should be planted.
- Concern around size of homes in new developments being too small.
- A number of specific heritage assets raised as issues.
- Would like to see Design Code address over-cladding and over-rendering of older and original features.
- Would like to see developers base designs off 'true' historical references rather than newer examples that are not in fact related to the local vernacular.
- Concerns around maintenance of features e.g., decorative wooden fascias that are not re-painted.

How the issues have been addressed

- Main issues raised have been addressed in Design Code development.
- Some site-specific comments not addressed as these fall into the development briefs and SPDs for regeneration sites.

Historic England Meeting– 1 December 2022

Summary of main Issues Raised

- Importance of highlighting below ground archaeology not just above ground heritage.
- Town centre intensification should be achieved and would welcome a modern reinterpretation of the 'Row' typology within Great Yarmouth town centre as part of redevelopment of vacant land/car parks.
- Design guidance should reference Historic England guidance.
- Design guidance should be practical and plain English.
- Good practice case studies suggested.
- Would like to see a good evidence base for characterisation. Concerned that Conservation Area Appraisals are not published or adopted.
- Would like to see design coding for roof form and height.
- Feel colour guidance would be too prescriptive.

How issues have been addressed

- All the main issues have been incorporated into the Design Code where within scope.
- Evidence base for characterisation has taken a proportionate approach within available resources and Conservation Area Appraisal reviews or adoption are not within scope of the Design Code.

Developer and Agents Workshop – 31 January 2023

Summary of main issues raised

- Interpretation of highways guidance is sometimes contradictory and inconsistent.
- The 'market' wants homes in cul-de-sacs not a more networked street pattern.
- Neighbour disputes can arise from shared parking areas.
- Choice and availability of materials is an issue when attempting to reflect local materials and vernacular.
- Welcome using NDSS as the space standard.
- Rigid guidance on back-to-back distances/overlooking would be problematic to implement.
- Standards for amenity space should take account of proximity of good quality public open space.
- Lower design speeds accepted by Highways authority would assist in producing better design.
- Adoption of SuDS and street trees is a barrier to including them in schemes.
- Would like to have lower parking ratios but Highways authority will not accept that walking and cycling can be used instead of the car.
- Future Homes Standards should be met.
- Residents like close boarded fencing.
- Would like to see mandatory energy efficiency and low/zero carbon technology standards.

How the issues have been addressed

- Issues raised have been addressed in development of the design code.
- Some matters raised have been balanced against wider design considerations.
- Guidance has been developed to address concerns around over-prescriptive approach and aims to allow alternative approaches to be taken while giving clear guidance on acceptable design solutions.

Norfolk County Council Meeting (Highways, LLFA & Natural Environment Team) – 27 February 2023

Summary of main issues raised

- Species for trees should not be too narrow a list as this leads to over-reliance on a few species – poor biodiversity and lack of identity.
- TDAG guidance should be referenced.
- Conflicts between paved areas, overground and underground utilities etc should be considered when planting street trees.
- Trees and SuDS can be adopted if appropriately designed.
- Primary streets should have SuDS both sides.
- Road safety with trees needs to be addressed.
- The 'Homezone' term is problematic and will not be supported in formal terms i.e., through TRO. However shared multi-functional living streets is supported in principle.
- Further feedback and guidance will be supplied by email.

How the issues have been addressed

- Matters raised have been addressed in the development of the Design Code.
- Further advice on species has been incorporated.

3. Final Draft Consultation: Summary of main issues raised and how they have been addressed

This section sets out the main issues raised by each respondent at each relevant section of the draft SPD and how they have been considered in the final version of the SPD.

Section 1.2: Status of the Design Code

Summary of Main Issues Raised

- Bourne Leisure (via Lichfields) – Seeks assurance that design code would be subject to further consultation if brought forward through the new Local Plan or future Supplementary Plan
- K. Newnham – Objects to Design Code taking precedence over adopted Neighbourhood Plan Design Codes
- K. Newnham – Queries the potential reforms of the planning system.

How issues have been addressed

- It is confirmed that if the Design Code is brought forward through the new Local Plan or a new Supplementary Plan it would be subject to further consultation in line with the appropriate Town and Country Planning regulations.
- The Design Code is clear that for areas where a Neighbourhood Plan has been made and includes design policies or neighbourhood design code, this will take precedence over the Design Code SPD, should there be a conflict. No changes are considered necessary to the SPD.
- Since the Design Code was prepared, planning reforms set under the Levelling-up and Regeneration Bill have since come into law and requires all planning authorities to produce design codes for its area, either through a Local Plan or Supplementary Plan. Reference to the Levelling Up and Regeneration Act (2023) has been updated in Section 1.2 of the introductory section.

Section 1.4: Structure of the Design Code

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers there to be a contradiction in the way ‘expected’ criteria of the code are interpreted, in that they are not ‘required’ but requires applicants to demonstrate why non-compliance would not be feasible or appropriate. It was also further suggested that as the majority of the codes are not ‘required’ and not covered by adoption national or local policy, there is no planning basis for developers to justify which that have not implemented such codes in their schemes. It was reiterated that the purpose of Supplementary Planning Documents is to provide further detail on the implementation of adopted policies, and not introduce new and more onerous requirements on applicants. It was suggested that the definition of ‘expected’ should be amended to make it clear that this is not a requirement for all new development, but examples of good practice that applicants will be encouraged to explore.

How issues have been addressed

- The code provides additional detail on how to comply with the policies set out in the Local Plan and does not introduce new policy, but provide a practical guide to what would be considered to constitute policy compliance.
- As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal, and in some cases, applicants may demonstrate that it would be unfeasible or unviable to be fully policy compliant in every detail, or that betterment can be achieved via a different approach.

However, the onus is on the applicants to justify their approach in these cases. It provides a practical guide to what would be considered to constitute policy compliance.

- All 'required' standards are based on national or local policy requirements, therefore all development should comply with these standards unless there are strong planning reasons to justify an alternative approach. As such, these 'required' elements carry the most weight in the assessment of the planning balance.
- All 'expected' standards are recognised approaches to meeting the expectations of policy. Other ways of demonstrating compliance may be acceptable but will need to be assessed on a case-by-case basis.
- Section 1.4 'Structure of the Design Code' has been amended to further clarify the above points.

Section 1.5: How to use the Design Code

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Largely repeats earlier comments that Supplementary Planning Documents should not introduce new planning policies and should contain policies that are clearly written so it is evidence how a decision maker should react to development proposals.

How issues have been addressed

- The code provides additional detail on how to comply with the policies set out in the Local Plan and does not introduce new policy, but provide a practical guide to what would be considered to constitute policy compliance.
- As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal, and in some cases, applicants may demonstrate that it would be unfeasible or unviable to be fully policy compliant in every detail, or that betterment can be achieved via different approach. However, the onus is on the applicants to justify their approach in these cases. It provides a practical guide to what would be considered to constitute policy compliance.
- All 'required' standards are based on national or local policy requirements, therefore all development should comply with these standards unless there are strong planning reasons to justify an alternative approach. As such, these 'required' elements carry the most weight in the assessment of the planning balance.
- All 'expected' standards are recognised approaches to meeting the expectations of policy. Other ways of demonstrating compliance may be acceptable but will need to be assessed on a case-by-case basis.

Section 2.1: Landscape character, coastal change, and flood risk

Summary of Main Issues Raised

- Broads Authority – Suggest amending reference to Broads Authority as 'equivalent' to national park.

How issues have been addressed

- Agreed. The relevant text has been amended as suggested.

Section 2.3: Local Building Materials

Summary of Main Issues Raised

- Historic England – Generally supports section but consider enhancement through inclusion of photographs showcasing material palette and examples of buildings using the materials.

How issues have been addressed

- Fig.2 (Figure 3 in final version) now includes examples of commonly used material pallets in the general area.
- Section 2.3 has been updated to provide additional detail on local building materials.

Section 2.4: Historic designations and assetsSummary of Main Issues Raised

- Historic England – Should include details of number/types of heritage assets across the Borough for local context. Also need to mention in text that heritage assets can be harmed (and enhanced) by development within their settings.
- K. Newnham – Maps on pages 11, 12, 13 and 14 are not clear and should be improved.

How issues have been addressed

- Section 2.4 has been updated to include general statistics regarding heritage assets to provide further historic context.
- Section 2.4 has been updated to reference that heritage assets have potential to be harmed and enhanced by development within their setting.
- Maps on pages 11, 12, 13 and 14 (pages 13-15 in final version) are at a high resolution. However, links to each mapping source has been provided within each caption for greater accessibility.

Section 3.1: Design VisionSummary of Main Issues Raised

- NCC Public Health – Design vision should include reference to supporting healthy behaviours and reducing health inequalities.

How issues have been addressed

- Bullet point 4 of the Design Vision and the ‘Why is design important’ dialogue box has been updated to reflect comment.

Section 4: Borough Wide Design RequirementsSummary of Main Issues Raised

- Bourne Leisure (via Lichfields) – The borough-wide design requirements principally relate to residential development; therefore, greater clarity is required in the text that not all requirements will apply to other types of developments e.g., Holiday Parks.

How issues have been addressed

- It is acknowledged that the borough-wide design requirements, whilst applying locationally across the borough, may not be relevant for all proposals. Section 1.5 already clarifies this; however, it is agreed that this could be strengthened, and this has been reflected under the borough-wide design requirement under Section 1.4.

Section 4.1: Addressing Climate Change and Conserving ResourcesSummary of Main Issues Raised

- NCC Public Health – Section should reference the health benefits of addressing climate change, for example active travel supporting physical activity.
- Natural England – Generally supportive of design code requirements and suggests including guidance for constructed wetlands (Introduction to Freshwater Wetlands for Improving Water Quality) to be included within the Useful Resources section.
- Broads Authority – Grammar correction. Insertion of “needs to address” in first sentence.
- Anglian Water – Include additional bullet point to reference to maximising water efficiency in new developments and regeneration/redevelopment of existing urban areas.

- Lead Local Flood Authority – Seeks removal of NCC Highways SuDS Adoption Guide under ‘Useful Resources’ section and replace with reference to LLFAs Developer’s Guidance document <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

How issues have been addressed

- Whilst the linked health benefits from addressing climate change is recognised, this is not considered to be the aim of the Design Code.
- The Useful Resources section of this part of the design code has been updated to reflect both the LLFA and Natural England’s comments.
- It is not considered necessary to add an additional requirement to ‘maximise water efficiency...” within this section as this is already considered to be sufficiently addressed through CC4.
- Typographical corrections have been updated throughout the document.

Section 4.1: Ensuring walking, cycling and public transport are the natural modes of travel for all users (CC1)

Summary of Main Issues Raised

- Sport England – Generally supportive of hierarchy of travel approach described under CC1, SM1 and SM2. Consider using term ‘active travel’ in the requirement to align with NMDC, NDG and AD3 (Active Design Guide). Suggests consideration given principle 4 in AD3 which refers to:
 - Avoid uniform ‘zoning’ of large areas to single uses.
 - Create mixed use, connected focal points in prominent places within a community.
 - Co-locate sport and recreation facilities alongside complementary uses.
 - Use the public realm to create informal activity at sports/recreation facilities.
- Broadland Housing Association (via Bidwells) – Considers that the CC1 criterions should not be “expected” as they go beyond adopted policy and are unqualified and don’t provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmark.
- Persimmon Homes – Considers that with reference to parking quantity/location, the Council should demonstrate how they will achieve cooperation from the highway authority to avoid uncertainty/delay in development delivery.

How issues have been addressed

- The principles of Active Design are considered to be fully embedded within the relevant design code criterions.
- It is disagreed that the ‘expected’ code criterions go beyond adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS1(e), CS9(d), CS9(h) and CS16 to help encourage healthy lifestyles and support sustainable transport options. It is considered that the first and fourth ‘expected’ criterion can be clearly assessed through any submitted layout of a scheme. The second and third ‘expected’ criterion have been amended to provide additional clarification on the interpretation of the criterions. There may be other acceptable ways of demonstrating compliance but these will need to be assessed on a case-by-case basis.
- In terms of parking, the design code has been prepared in co-operation with the highway authority throughout its development to ensure that it, as far as possible, mutually meets requirements and expectations.

Section 4.1: Minimising active heating and cooling requirements through passive design (CC2)

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Design Code needs to be mindful that is not always viable to just include single aspect homes when balanced alongside daylight/sunlight considerations. Flexibility required in the SPD.
- Broadland Housing Association (via Bidwells) – Considers that the CC2 criteria should not be “expected” as they go beyond adopted policy, and already addressed through Policy CS12. Considers requirements are unqualified, potentially contradictory to Building Regulations and don’t provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmark.
- Broads Authority – reference to Figure 7, noted that lots of glazing can cause light pollution issues as well and needs to be mitigated.

How issues have been addressed

- The McCarthy & Stone representation is misinformed as the ‘expected’ criterion does not seek to include single aspect homes.
- It is disagreed that the ‘expected’ code criteria go beyond adopted policies, nor contradictory to Building Regulations. These provide recognised qualitative approaches to aid the interpretation of Policies CS12 and A2(f) to improve energy efficiency of residential and non-residential buildings. It is considered that the ‘expected’ criteria through 1 to 4 can be clearly assessed through any submitted layout and design of scheme. Criterion 5 can be assessed through the discharge of conditions regarding the details of windows. There may be other acceptable ways of demonstrating compliance, but these will need to be assessed on a case-by-case basis.
- Fig 7 (Figure 9 in final version) has been amended to clarify the relationship between glazing and potential light pollution issues.

Section 4.1: Integrate on-site renewable energy generation and low and zero carbon heating, cooling, and ventilation systems (CC3)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the CC3 criteria should not be “expected” as they go beyond adopted policy. Considers that design code should focus on design matters such as location, potential nuisance, visual impact etc rather than, for example, providing air source heat pumps. Suggests amended code to reflect design elements.

How issues have been addressed

- Whilst Policy CS12 and A2(f) seek to improve the energy efficiency of residential and non-residential buildings, it is agreed that specific use of heat pumps are not sought through the existing adopted policy. The ‘expected’ criterion has therefore been amended as a ‘best practice’ consideration to be applied “where practicable”.

Section 4.1: Minimise potable water use (CC4)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that CC4 does not relate to priority aspects of design and is already covered by adopted policy. Suggests that code doesn’t provide any advice on how restriction of 110 litres per person should be incorporated into schemes. Suggests removal or further information to demonstrate how proposal can meet the water efficiency target.

- Anglian Water – supports inclusion within code. Recommends minimum standard of 100 litres per person be included in the code which to align with the Government Environmental Improvement Plan.

How issues have been addressed

- It is disagreed that the ‘required’ provides unnecessarily duplication of adopted policy but provides clarity for users of the design code on local policy requirements. Policy CS12(f) encourages all new non-residential developments to use water prudently and make greater use of existing and emerging water recycling and storage technologies. The ‘expected’ criterion has therefore been amended to ensure this relates to non-residential uses only. Integration of rainwater harvesting and greywater reuse to reduce potable water use for residential developments has been amended as ‘best practice’ only. It is considered that compliance with the ‘required’ code is relatively straight forward to achieve through the correct specification of fittings. The ‘expected’ criterion can also be easily achievable through design.
- Whilst higher water efficiencies standards beyond 110l/pp/pd for residential uses are being proposed in several other Local Plans, this goes beyond the existing policy requirement in the adopted Great Yarmouth Local Plan, therefore it cannot be reasonably expected through the Design Code.

Section 4.1: Reduce embodied carbon emissions resulting from construction (CC5)

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Considers that introducing embodied carbon policy must not be inflexible as it may introduce a financial burden and deem site unviable. Cites that new development often more sustainable through fabric first, MMC and sustainable optimisation of site. Seeks availability of embodied carbon figures through an Environmental Product Declaration.
- Broadland Housing Association (via Bidwells) - Considers that the CC5 criteria should not be “expected” as they go beyond adopted policy. Considers requirements are unqualified and don’t provide benchmark by which to be assessed. Suggests removal or flexibility to ensure requirement is practical and feasible.
- Anglian Water – Supports inclusion in code.

How issues have been addressed

- Whilst a key tenet of the adopted Local Plan is to seek to minimise the impact of development upon the environment, it is agreed that as this relates to a Strategic Objective, rather than an adopted policy, that the ‘expected’ criterion be amended as a ‘best practice’ standard only.

Section 4.1: Ensure development is flood safe and flood resilient (CC6)

Summary of Main Issues Raised

- Lead Local Flood Authority – Seeks inclusion of compliance with LLFAs guidance within expected requirements.
- Broadland Housing Association (via Bidwells) - Considers that the ‘required’ CC6 criterion does not relate to priority aspects of design and already covered by adopted policy and would need to be addressed as part of any application with regards to comments from LLFA and Environment Agency. It was further suggested that the ‘expected’ CC6 criteria go beyond the requirements of adopted policy. Suggests removal of all code requirements.

How issues have been addressed

- It is disagreed that the ‘required’ standard doesn’t relate to priority aspects of design. It clearly relates to relevant design considerations listed under BD1, BD3 and CC7 which should

be expected to be considered and addressed to ensure developments in areas at risk of flooding are well designed to be flood safe and resilient.

- In terms of the 'expected' criterion which consider salt tolerant materials – this is a generally poorly addressed area within national guidance which is generally drafted to address fluvial (non-tidal) flood risk. However, in tidal areas, salt resistance is a consideration. Notwithstanding, it is accepted that this should be considered as 'best practice' and the design code has been updated to reflect this.
- The 'expected' criterion has been updated to reflect the need to ensure that applicants also check compliance with the LLFA guidance.

Section 4.1: Reduce the risk of surface water flooding on and around the site (CC7)

Summary of Main Issues Raised

- Water Management Alliance – References Internal Drainage Boards are regulators of ordinary watercourses. Suggests that the Board's regulation should be referenced within the code requirement.
- Broadland Housing Association (via Bidwells) – Considers that the 'required' criterions doesn't relate to the priority aspects of design and would need to have regard to comments from LLFA in relation to SuDS hierarchy. Considers that remaining 'expected' criterion of the code are not necessary as go beyond adopted policy, unqualified and don't provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmarks.
- Anglian Water – Supports inclusion of code requirement. Recommends that the multi-functional and integrated aspects of SuDS should also include reference to rainwater/stormwater harvesting and reuse in new developments under the 'expected' criterion.
- Lead Local Flood Authority – Considers that the 'required' criterion should be amended to ensure that the LLFA's Developer Guidance is appropriately applied to all developments for surface water management as this is consistent with National Planning Policy.
- Hemsby Parish Council – Parish Council wishes to see fences over knee height to deter children from playing in/around SuDS.
- K. Newnham – Supports the indicative examples of SuDS provided under Fig 9.

How issues have been addressed

- Reference to the Internal Drainage Boards requirements is a regulatory matter than will typically be addressed through the planning process and therefore not necessary to specifically include within the Design Code.
- It is disagreed that the 'expected' criterion are unqualified or unclear. The LLFA have been engaged throughout the preparation of the Design Code and have agreed the wording of this section. It is considered that providing quantitative standards for an aspect of design which needs to be approached in a holistic and integrated manner will not result in the most appropriate design response. The aim is to encourage an integrated SuDS approach that maximises the attenuation of surface water and results in a high-quality landscape design and the wording is clear in this regard. The Code closely follows the SuDS hierarchy set out in other guidance e.g., CIRIA SuDS manual and similar.
- The 'expected' criterion has been updated to provide greater clarity on the use of rainwater/stormwater harvesting and reuse in new developments.
- Whilst it is agreed that the LLFA's guidance and run-off rates should be considered, there may be instances where a departure is locally justified. Therefore the 'required' criterions have been amended as 'expected' rather than 'required'.

- For better consistency with the CIRIA guidance, the 7th ‘expected’ criterion has been amended to seeks to avoid fences around SuDS features such as ponds and watercourses through design of gradients and depths, and the use of natural planting as a barrier.

Section 4.1: Reduce urban heat island effect (CC8)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) - Considers that the CC8 criterions should not be “expected” as they go beyond adopted policy. Considers that the requirements of the code don’t provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmarks.

How issues have been addressed

- Whilst a key tenet of the adopted Local Plan is to seek to minimise development impacts on the environment, including designing developments to be more resilient to climate change, it is agreed that as this relates to a Strategic Objective rather than an adopted policy, that the ‘expected’ criterion be amended as a ‘best practice’ consideration only.
- However, it is recognised that additional guidance and/or benchmarking under this criterion would be helpful as generally an area of design that is not as well-informed in practice than others. This section of the design code has also been updated to an additional case on the importance of reducing the urban heat island effect.

Section 4.1: Minimising resource usage through future building maintenance, alterations, and adaption (CC9)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) - Considers that the CC9 criterions should not be “expected” as they go beyond adopted policy. Considers that the requirements of the code don’t provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmarks.

How issues have been addressed

- Whilst it is considered that the criterions provide recognised qualitative approach to aid the interpretation of one of the adopted Local Plan’s Strategic Objectives, it is agreed that as this does relate to an adopted policy, that the ‘expected’ criterions be amended as ‘best practice’ standards only. It is considered that the criterions can be adequately considered and demonstrated through information such as an accompanying Design and Access statement.

Section 4.2: Context and Identity

Summary of Main Issues Raised

- Historic England – Welcomes references to historic environment and heritage assets within section and requirements under CI1, CI2 and CI3.
- Natural England – Considers that an updated Landscape Character Assessment would provide a useful evidence base to assess opportunities to conserve and enhance the built and natural environments and record areas where there has been deterioration since last assessment.

How issues have been addressed

- It is not considered necessary to update the Council’s Landscape Character Assessment as the landscape has not changed substantially since the previous LCA was undertaken.

Section 4.2: Design with regard to local context, including the surrounding built environment, topography, landscape, and drainage (CI1)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Supports the general principle of the ‘required’ criterion but considers that the remaining criterions are not necessary as they go beyond adoption policy. Suggests removal of ‘expected’ criterions.
- Anglian Water – Supports general reference to drainage in the code but seeks further reference within the ‘required’ and ‘expected’ criterions to ensure that the topography/landform and soils on a site are considered at the outset as these inform the strategic placement of SuDS and integrated water management opportunities.

How issues have been addressed

- It is disagreed that the ‘expected’ code criterions go beyond adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A2(a), CS9(a) and E5 to ensure design of new developments have regard to local context.
- The ‘required’ criterion has been amended to reference topography, underlying soils and geology when analysing the site context.

Section 4.2: Conserve and enhance the significant of heritage assets (CI2)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Suggests that the ‘expected’ code requirements should be upgraded to ‘required’ for consistency with other design code contained within the document. However, in the round it was considered that to prevent duplication of existing policy that the code should be removed.

How issues have been addressed

- It is disagreed that the criterion should be promoted to ‘required’. There is no higher-level policy in the adopted Local Plan which would support this to become a ‘required’ standard for example Policy E5 does allow an element of flexibility i.e. loss in certain circumstances.

Section 4.2: Create a positive and distinctive sense of place for new developments (CI3)

Summary of Main Issues Raised

- Badger Building – Considers the code to be overly prescriptive and therefore questions how much inherent flexibility will be allowed to create a distinctive and place specific identity. It was also suggested that the code impractically restricts standards house types, citing their actual flexibility to respond to a variety of locations and layouts, and potential shortcomings in the perceived conversion of mass building of homes into mass building of custom-built homes.
- Lead Local Flood Authority – Seeks amendment in code to include reference to SuDS which supports the creation of a positive and distinctive sense of place and also supports one of the four pillars of SuDS (amenity).
- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criterion of CI3 is already covered by adopted policy and should be removed to prevent duplication. Considers the remaining ‘expected’ criterions as not necessary as they go beyond adopted policy and don’t provide a benchmark for assessment.
- Persimmon Homes – Seeks greater clarity on definition of ‘character areas’ e.g., what they entail, what stage of development that is would be given weight on. Citing problems with disjointed clusters and jarring incompatible design features if required in phases within a large-scale development.

How issues have been addressed

- The Design Code is not considered to be prescriptive and requires applicants to take a site-specific approach, whilst ensuring that the core principles of achieving good design are duly considered and set out in a Design and Access statement to clearly explain how the site and context and the requirements of the design code has been taken into account. The design code acknowledges that some flexibility will be necessary when determining proposals and that some requirements may need to be balanced against each other where it is demonstrated by the applicant which it may or may not be feasible or appropriate to achieve.
- The Design Code does not restrict the use of 'standard house types' but seeks to ensure that the design of all house types have regard to the local context and contribute towards local distinctiveness.
- It is disagreed that the 'required' criterion provides unnecessarily duplication of adopted policy but provides clarity for users of the design code on local policy requirements.
- It is also disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS9(b) and A2(b) to ensure design of new developments creates a positive and distinctive sense of place and identity. It is considered that the 'expected' criteria can be adequately considered and demonstrated through information such as a Design and Access statement which must demonstrate how a proposed development's context has influenced the design.
- The criterion has been updated to make it clearer that including different character areas should also be addressed at the outline application stage as part of a master planned approach and can be achieved through the use of different approach to layout, house design, or variation in materials and details.
- It is agreed with the Lead Local Flood Authority. The first 'expected' criterion has been amended to include reference to landscaping and including SuDS.

Section 4.2: Use external materials and detailing which complement the local context and are appropriate for the local climate (CI4)Summary of Main Issues Raised

- Historic England – Welcomes requirements that new development should use materials and details which reflect the local vernacular, however it is considered that there might be a potential conflict with requirement that the materials and details used must be robust and suitable for the local climate. It is suggested that the text is amended to encourage consideration of the maintenance implications associated with these materials.
- Badger Building – Considers that quality materials, such as replacing plastic windows often command higher prices and that this could significantly affect build costs and viability.
- Broadland Housing Association (via Bidwells) - Considers that the CC4 criteria should not be "expected" as they go beyond adopted policy. It was also considered that the criterion largely repeats CI1 and therefore questions the need for the requirement. It was suggested that the code requirement be removed.
- Hemsby Parish Council - The Parish Council did not consider exterior materials to be in alignment with the Hemsby NHP i.e., windows, roofing, or cladding materials.

How issues have been addressed

- Whilst Historic England's comments are noteworthy, vernacular materials are generally robust, for example hydraulic lime render can be as robust as cement. Therefore, it is not considered necessary to update to reflect comments.
- It is acknowledged that the non-use of uPVC when replacing windows, doors etc may have cost implications, and their use may be an appropriate material in specific circumstances.

The criterion has been amended to remove reference to uPVC windows, doors, fascias and cladding as not being general acceptable.

- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS9(a) and A2(b) to ensure the use of external materials in the design of new development complement the local context and help to foster a design identity.
- It is disagreed that the Design Code CI4 repeat CI1. CI4 is focused upon the ensuring the chosen approach to materials responds to local context, whilst CI1 deals with matters relating to general site layout and massing.
- The Design Code has been prepared at a borough-wide scale; therefore, it is unable to be prescriptive on the exact types of likely appropriate materials in every area of the borough, including Hemsby. Notwithstanding, the Hemsby NP specifies similar materials to the GY Design Code, therefore they are regarded as being generally compatible. Materials suitable for inland and historic village centres can be found in Section 5.10.

Section 4.3: Streets, movement, and parking

Summary of Main Issues Raised

- K. Newnham – Considers it a mistake to reduce vehicle parking as it would lead to a 'park anywhere' situation. Considered that well-meaning attempts to change car habits to cycles and buses will take time. Suggested that one allocated parking space be provided outside the house and several smaller areas for additional unallocated parking to cover visitors and other family members.

How issues have been addressed

- It is considered that the above comment is aligned with the design code approach which suggests development should include a range of different parking area and types including on-plot, on-street and shared unallocated parking. It also specifies that the landscape design should physically prevent 'park anywhere' behaviour through careful placement of street trees, street furniture, SuDS features and similar.

Section 4.3: Create a walkable and integrated network of street and pedestrian/cycle routes (SM1)

Summary of Main Issues Raised

- Sport England – Generally supportive of hierarchy of travel approach described under CC1, SM1 and SM2. Consider using term 'active travel' in the requirement to align with NMDC, NDG and AD3 (Active Design Guide). Suggests consideration given principle 4 in AD3 which refers to:
 - Avoid uniform 'zoning' of large areas to single uses.
 - Create mixed use, connected focal points in prominent places within a community.
 - Co-locate sport and recreation facilities alongside complementary uses.
 - Use the public realm to create informal activity at sports/recreation facilities.
- Broadland Housing Association (via Bidwells) – Considers that the 'required' criteria are not necessary as these duplicate adopted policy. Considered that the 'expected' criteria are not necessary as they go beyond adopted policy, are unqualified and don't provide a benchmark for assessment. It is suggested that the code requirements are removed, or further information provided on how proposals will be required to achieve this in practice.

How issues have been addressed

- The 'expected' criterion has been updated to ensure that new walking and cycling routes connect to local destinations and encourage active travel.
- It is disagreed that the 'required' criterion unnecessarily duplicates adopted policy but provides clarity for users of the design code on local policy requirements.

- It is also disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies GSP7, CS9(d) and A2(d) to ensure that the layout of developments provide convenient routes for pedestrians and cyclists and are designed around a clear hierarchy of streets. These are considered to be duly qualified as they accord with the principles of Manual for Street and Norfolk County Council’s acceptable highways standards. It is considered that the ‘expected’ criteria can be adequately considered and demonstrated through information such as a Design and Access statement which must demonstrate how a proposed development can be adequately accessed by all prospective users.

Section 4.3: Design movement routes to clear and consistent standards which prioritise vulnerable users, children, pedestrians, and cyclists (SM2)

Summary of Main Issues Raised

- Badger Building – Questions whether the Highway Authority has signed up to the Design Code and whether they will be providing a suitably modified technical document covering the necessary highway design amendments to deliver the new design agenda. It was reiterated that there must be 100% buy in on the Design Code from the Highway Authority.
- Lead Local Flood Authority – Considers the opportunity to include the use of SuDS to help separate vulnerable users from trafficked areas, such as the use of raingardens.
- Sport England – Generally supportive of hierarchy of travel approach described under CC1, SM1 and SM2. Consider using term ‘active travel’ in the requirement to align with NMDC, NDG and AD3 (Active Design Guide). Suggests consideration given principle 4 in AD3 which refers to:
 - Avoid uniform ‘zoning’ of large areas to single uses.
 - Create mixed use, connected focal points in prominent places within a community.
 - Co-locate sport and recreation facilities alongside complementary uses.
 - Use the public realm to create informal activity at sports/recreation facilities.
- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criteria are not necessary as these duplicates adopted policy. Considered that the ‘expected’ criteria are not necessary as they go beyond adopted policy, are unqualified and don’t provide a benchmark for assessment. It is suggested that the code requirements are removed, or further information provided on how proposals will be required to achieve this in practice.
- Persimmon Homes – Considers the example street layout diagrams bear no resemblance to the established development patterns in the borough and would be contrary to the aspirations set out under Section 6.1. They also consider there to be conflicts between the Council’s objectives and those of the Highway Authority in terms of parking, circulation, road/street requirements, servicing, and safety. It was also considered that LTN1/20 is only applied to main distributor roads and that there is conflict between it and Manual for Streets. It was suggested that it should be made clear throughout this section of the Design Code what policies/guidance take precedence.

How issues have been addressed

- The Design Code has been prepared with the oversight of a steering group which includes the Highway Authority to ensure that there is no material conflict between relevant guidance and processes. The Highway Authority are fully supportive of the principles of the Design Code. To provide clarification, the introductory section of the design code has been updated to reference the preparation of the design code and involvement of the steering group.
- The use of SuDS as an example of helping to separate vulnerable users from trafficked areas is already included in the Design Code.

- It is disagreed that the ‘required’ criterion unnecessarily duplicates adopted policy but provides clarity for the users of the design code on local policy requirements.
- It is also disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS9(d) and A2(d) to ensure that the design of movement routes prioritise non-car modes of transport. These are duly qualified as they accord with the principles of Manual for Streets. It is considered that the ‘expected’ criteria can be adequately considered and demonstrated through information such as a Design and Access statement which must demonstrate how a proposed development can be adequately accessed by all prospective users.
- The example diagrams provided within the section are in accordance with the National Model Design Code, MfS, LTN 1/20 and other best practice guidance including adopted and implemented design codes from other areas. The design of new streets is not intended to directly replicate older street forms which were laid out in a very different era and with different priorities. The photographic examples included show that these kinds of new street designs can and do work very well and do not preclude compact, efficient forms of development and can be utilised in a range of layouts which reflect local urban grain and contexts.
- LTN 1/20 applies to all kinds of streets and spaces, not just main distributors. It is acknowledged that there is inconsistency in some of the detail of guidance produced at national and local level, due to guidance being produced at different times and not having been consistently updated. However, the basic principles are clear across all documents and the user hierarchy which prioritises pedestrians and cyclists applies. NCC Highways have been fully involved in the development of the Design Code and do not consider there is a conflict between the Design Code and their requirements.
- The ‘expected’ criteria has also been amended to ensure new streets should be designed in accordance with the street design principles illustrated within this section.

Section 4.3: Create multifunctional streets which contribute to creating vibrant and active communities (SM3)

Summary of Main Issues Raised

- Sport England – Generally supports the principle of the requirement as it accords with AD3 of Active Design.
- Broadland Housing Association (via Bidwells) - Considers that the SM3 criteria should not be “expected” as they go beyond adopted policy. It also considers that the requirements should not expect developments to follow homezone/Woonerf street principles as it could stifle, innovative design or impose unintended impediments on the ability to adopt highways infrastructure. It is suggested that the code is removed, or some flexibility required to ensure it doesn’t stifle innovation within design.
- Persimmon Homes – Considers that none of the examples provided within this part of the code include any local referencing, and it is unclear how these developments could assimilate to the established built form present in the borough. It was further added that there needs to be certainty from the Highway Authority that there would be no objections raised in terms of the integration of seating/informal play and application of parking standards on multifunctional streets.

How issues have been addressed

- it is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A2 and CS9 in encouraging people centred spaces. There are many ways of designing streets to be multifunctional and vibrant. Homezone and Woonerf street principles are indicative

examples of how these could be achieved and not a rigid approach. Norfolk County Council are supportive of the broad principles of developing shared spaces within developments.

Section 4.3: Ensure the amount and design of cycle parking and storage incentivises cycling on an everyday basis (SM4)

Summary of Main Issues Raised

- Sport England – Fully supportive of the guidance which incentivises cycling, however questions that this should not be restricted to residential uses only. It was also suggested that provision for showers and lockers should be included as part of the provision of cycle storage and associated facilities.
- Badger Building – Considers that the code requirement unrealistically assumes 100% bike ownership amongst the population. Government figures (2022) gives cycle ownership at 45% with usage levels at around 10% of population. Therefore even 75% requirement against bedspaces would be excessive.
- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criteria are not necessary as these duplicates adopted policy. It is also considered that the ‘expected’ criteria are not necessary as they go beyond adopted policy and would cause confusion with the adopted parking standards. It was also commented that the ‘expected’ and ‘best practice’ requirements don’t provide a benchmark for assessment. It is suggested that the code requirements are removed, or amendments required to ensure the criterion doesn’t conflict with adopted highway standards.
- Persimmon Homes – Considers the requirements to be extremely prescriptive and does not allow variation of house types or allow for flexibility due to space/density conflict. Suggested amendments include:
 - Under ‘expected’
 - For dwellings, provide resident cycle parking as per the NCC Minimum Parking Standards.
 - For HMOs, provide 1 resident cycle space per bed space, and 1 visitor space per dwelling (which can be uncovered and outside of a secure enclosure, e.g., a Sheffield stand).
 - For retirement housing, provide 1 secure resident cycle space, and one visitor cycle space, per two bed spaces. Many older people use cycles, and in particular e-bikes, for exercise and leisure.
 - Under ‘Best Practice’
 - For all residential cycle storage, provide one electric outlet per two cycle spaces to facilitate e-bike charging.
 - Provide adequate secure cycle storage to accommodate at least one cargo bike per dwelling.
 - Garages can be counted as allocated parking spaces for cycle storage where adequate on plot parking is provided.
 - Cycle storage can be within curtilage of dwelling but must be secure and covered e.g., cycle locker; dedicated store/shed; dedicated space within hallway/ secure porch; dedicated space within expanded garage.
 - Locate cycle storage closer to entrance doors, than car parking/ storage
 - Ensure cycle storage is secure and naturally overlooked to deter theft.
- Lead Local Flood Authority – Suggests that green roofs on bike storage should be encouraged, as those presented under Fig.24.

How issues have been addressed

- It is considered that cycle storage/parking for non-residential uses are already covered through this section of the design code. It is not considered that specifying showers/lockers would be within the purpose of the Design Code.

- With regards to cycling requirements, it is acknowledged that the ‘expected’ standards are higher than the NCC standards in some regards. This reflects the fact that cycling is not just one mode of transport but also a form of exercise, sport, and activity. Many people own more than one bicycle for different purposes and homes, particularly in rural areas such as Great Yarmouth, should be designed to accommodate enough cycles so that people of all ages can lead active and healthy lifestyles.
- It is acknowledged that as adopted local policies only requires ‘regard’ to be had to NCC parking standards, that ‘meeting’ NCC minimum requirements should be amended to an ‘expected’ criterion. This has been amended in the design code.
- It is also disagreed that the ‘expected’ criterion go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation Policy I1 and Policy CS9(e) to ensure the amount and design of cycle parking incentivises cycling on an everyday basis. Whilst it is acknowledged that the ‘expected’ standards are higher than NCC standards, this reflect the fact that cycling is not just one mode of transport but also a form of exercise, sport, and activity. Many people own more than one bicycle for different purposes and homes, particularly in the rural areas such as Great Yarmouth, should be designed to accommodate enough cycles so that people of all ages can lead active and healthy lifestyles.
- To provide additional flexibility in the ‘expected’ criterion with regards to cycle parking, the 6th ‘expected’ criterion has been amended to allow cycle parking to be accommodated within garages where it is large enough to accommodate as well as a car. The 9th ‘expected’ criterion has been amended to be relevant only where residential parking is not provided on-plot.

Section 4.3: Ensure that the amount and design of car parking and storage is adequate and designed to minimise antisocial parking (SM5)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criteria are not necessary as these duplicates adopted policy. Considered that the ‘expected’ criteria are not necessary as they go beyond adopted policy and would cause confusion with the adopted parking standards. It was also commented that the ‘expected’ and ‘best practice’ requirements don’t provide a benchmark for assessment. It is suggested that the code requirements are removed, or amended to provide further information on how proposals will be required to achieve the criterion in practice.
- Persimmon Homes- Considers that some of the ‘expected’ criteria are in conflict with each other e.g., “Include a mix of parking solutions (on-plot, on-street, shared parking areas/courts) to avoid a car-dominated environment.” Directly conflicts with: “Deter unplanned on-street parking through the design and layout of streets, and through inclusion and enforcement of parking restrictions.”. It was further stressed that there are serious concerns relating to reliance on on-street parking anywhere other than within the town centre as this raises uncertainty over parking ownership and lead to unplanned street parking. This is considered to directly conflict with NCC parking standards.

How issues have been addressed

- It is disagreed that the ‘required’ criterion unnecessarily duplicates adopted policy but provides clarity for the users of the design code on local policy requirements.
- It is also disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A2(d) and I1 on the design and provision of car parking. These are considered to be duly qualified as they accord with the principles of Manual for Streets and Norfolk County Council’s highway design principles. NCC Highways have been fully involved in the

development of the Design Code and do not consider there is a conflict between the Design Code and their requirements.

- It is considered that the 'expected' criteria can be adequately considered and demonstrated through the design and layout of submitted plans and information through a Design and Access statement.
- There is not considered to be any conflict within the different requirements of this part of the design code. Planning for on-street parking should form part of the parking mix and landscape design should prevent unplanned on-street parking. NCC Highway have been fully involved in the development of the Design Code and do not consider there is any conflict between the Design Code and their requirements.

Section 4.3: Ensure adequate and well-designed access for servicing vehicles (SM6)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the 'required' criteria are not necessary as these duplicates adopted policy. Considers that the 'expected' criteria are not necessary as they go beyond adopted policy would be required to have regard to NCC Highways. It was also commented that they do not provide a benchmark for assessment. It is suggested that the code requirements are removed, or amended to provide further information on how proposals will be required to achieve the criterion in practice.

How issues have been addressed

- It is disagreed that the 'required' criterion unnecessarily duplicates adopted policy but provides clarity for the users of the design code on local policy requirements. It is also disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy CS9(e) to ensure vehicular access is provided that is suitable for the use and location of the development.
- It is considered that the 'expected' criteria can be adequately considered and demonstrated through the design and layout of submitted plans and information through a design and access statement.

Section 4.4: Public open space, nature, and water

Summary of Main Issues Raised

- Norfolk County Council Public Health – Considers that local growing options such as allotments/ orchards can provide healthy food options.
- Natural England – Espouses the multi-functional benefits that urban green spaces can provide including managing environmental risks such as flooding and heatwaves and providing improved access to nature for public health benefits. It was suggested that inclusion of reference to the Norfolk Green Infrastructure Recreational Impact and Avoidance and Mitigation Strategy (GIRAMS) would be useful as this commits to deliver enhanced GI. It was further suggested that consideration should be given to protection of natural resources, air quality, ground, and surface water soils within urban design plans.

How issues have been addressed

- It is acknowledged that the provision of healthy food options is important, however this is not considered to be of direct relevance to the Design Code.
- The multifunctional benefits of urban green spaces are fully agreed with; however, it is considered that the existing criteria within Section 4.4. of the Design Code already provide consideration for such spaces.
- It is not considered necessary to reference the Norfolk Green Infrastructure Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) within the design code as it is felt that

this would be appropriately captured under existing local planning policies for relevant proposals.

- It is considered that the protection of natural resources, air quality, ground and surface water, soils etc are already considered through existing planning policies and do not need to be included within the Design Code.

Section 4.4: Integrate existing natural features, including water and trees, in site layouts (PS1)

Summary of Main Issues Raised

- Lead Local Flood Authority – Considers that a required criterion should indicate that existing watercourses must be retained and incorporated into the proposed design.
- Norfolk County Council Natural Environment Team – Advises that reference is made to the RTP/ RSPB best practice guidance Cracking The Code; How design codes can contribute to net-zero and nature’s recovery: Plan The World We Need (rspb.org.uk) and Site Level Design Code; Design Code for Net Zero and Nature Recovery: site-code_220317_compressed.pdf (rspb.org.uk)
- Broadland Housing Association (via Bidwells) – Considers that the PS1 criteria should not be “expected” as they go beyond adopted policy. It was also suggested that the criterion largely repeat criteria under CI1, or what would be covered under BNG policies. It is suggested that the code requirements are removed.
- Anglian Water – Supportive of a design-led approach that is framed and led by green and blue infrastructure opportunities and focusses on the existing environmental/natural assets present on the site, which helps to assimilate biodiversity net gains and positive benefits for surface water management.

How issues have been addressed

- Whilst the importance of seeking to retain and integrate existing ordinary watercourses is acknowledged, it may not always be possible to achieve. Notwithstanding, Design Code CI1 ensures that the design should have regard to local context which includes landscape and drainage.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS11, E4 and A2 to ensure existing natural features, including water and trees, are suitably considered, and incorporated within site layout. It is not considered that the criterion repeats CI1. PS1 is focused upon the ensuring a landscape led design approach is undertaken at an early stage of development design whilst CI1 deals with matters relating to general site layout and massing.
- Reference to RTP/RSPB design code best practice is not relevant as this concerns producing codes rather than providing additional detail for users of codes.

Section 4.4: Provide a sufficient quantity, type, and quality, of public open space and green infrastructure with development (PS2)

Summary of Main Issues Raised

- Broads Authority – typographical errors identified relating to the third ‘expected’ criterion.
- Sport England – Fully supports the principle of the requirements which accords with theme 2 of AD3 (Active Design). Also supportive of requirement to consider needs of all users in design of public spaces as these accords with overarching theme of AD3 (Active Design). Suggests that criteria could further to reflect principles 5 of AD3, namely:
 - Linking open spaces together within and beyond a site
 - Integrating a diversity of natural habitats to make environments where people want to be outdoors and active.

- Making space for children's play
- Broadland Housing Association (via Bidwells) – The 'required' criterion of the code is already covered by adopted policies including the Open Space SPD, highlighting the fact that it is not necessary and should be removed. The remaining 'expected' criterion of the code are not considered necessary as they go beyond adopted policy and it is not clear how such criterions will be benchmarked for assessment. It is suggested that the code is removed.
- Persimmon Homes - Seeks comfort in that if site circumstances can justify a departure from the Open Space SPD, some flexibility will be allowed.

How issues have been addressed

- It is disagreed that the 'required' criterion unnecessarily duplicates adopted policy or standards but provides clarity for the users of the design code on local policy requirements. To ensure the 'required' criterion is fully consistent with adopted policy, the criterion has been amended to reference parent policy H4 (Open space provision for new housing development). It is disagreed that the 'expected' criterions go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies GSP6 and H4 to ensure proposals provide sufficient quantity, type, and quality of open and green spaces. It is considered that the criterion can be adequately demonstrated through supporting layout plans and accompanying design and access statements.
- The Open Spaces SPD provides greater interpretation on the quantity of open spaces that are to provide under the auspices of Policy H4. Any departure from the requirements must be justified under provisions provided by Policy H4.
- Typographical corrections have been updated throughout the document.
- It is considered that further suggestions relating to principles of Active Design have already been sufficiently incorporated into the Design Code.

Section 4.4: Ensure public access to watercourses (PS3)

Summary of Main Issues Raised

- Sport England - Fully supports the principle of widening up accessibility to green and blue infrastructure. Consideration should also be given to how this will integrate with existing and other proposed active travel routes.
- Broadland Housing Association (via Bidwells) - Considers that the criterions should not be "expected" as they go beyond adopted policy and would be required to have regard to comments from the LLFA. Considers that the requirements of the code don't provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmarks.
- Persimmon Homes – Seeks flexibility on this as access is dependent on ROSPA requirements, particularly where play spaces are being created.

How issues have been addressed

- It is disagreed that the 'expected' criterions go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS17(f) and CS9(a) to ensure access to watercourses are created, particularly with reference to the Great Yarmouth waterfront regeneration area. It is considered that the criterion can be adequately demonstrated through supporting layout plans and accompanying design and access statements.
- As an 'expected' criterion it is considered that the design code provides the necessary flexibility to take account of other site-specific considerations, including other statutory requirements (such as those published by ROSPA) when designing spaces.

Section 4.4: Improve biodiversity on and around the development site (PS4)

Summary of Main Issues Raised

- Lead Local Flood Authority – Considers there to be an opportunity to include SuDS into the text rather than the single mention of green roofs. Other opportunities include Tree pits, rain gardens, attenuation ponds and wetlands all of which would add biodiversity and amenity.
- Norfolk County Council Natural Environment Team - Advises that reference is made to the CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments (ciria.org) and the Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure final edits to make (blog.gov.uk)
- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criterion would be covered by BNG process and should be removed to avoid duplication. Considered that the ‘expected’ criterion are not necessary as these go beyond adopted policy and would also need to accord with BNG, Open Spaces SPD and have regard to comments from the LLFA. It was also considered that the criteria do not provide any benchmark by which to be assessed. It is suggested that the code is removed.
- Anglian Water – Suggests reference to the emerging Local Nature Recovery Strategy for Norfolk, to assist developers with designs that improve habitat connectivity and habitat creation.
- Hemsby Parish Council - The Parish Council notes that the code seeks the avoidance of living walls, however the Hemsby NHP encourages these.
- Natural England – Supports requirements to maximise opportunities to secure at least 10% BNG on site. It was further considered that there may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:
 - green roof systems and roof gardens.
 - green walls to provide insulation or shading and cooling.
 - new tree planting or altering the management of land (e.g., management of verges to enhance biodiversity).

How issues have been addressed

- Reference to SuDS within first ‘expected’ criterion has been included for greater clarity.
- Reference to CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments (ciria.org) and the Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure final edits to make (blog.gov.uk) has been included in the ‘Useful Resources’ under Section 4.4.
- It is acknowledged that as requirements for biodiversity net gain will be mandatory through national planning policy in 2024, that the ‘required’ criterion is not necessary. The ‘required’ criterion has been removed from this part of the Design Code.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy CS11 to ensure that proposals includes measures which improve biodiversity on and around a development site. It is considered that the criteria can be adequately demonstrated through supporting layout plans and accompanying planning, and design and access statements.
- Role of Local Nature Recovery Strategies are acknowledged, but, as currently in draft, not considered appropriate to reference in Design Code. Consideration may be given to including reference in any further subsequent updates of the SPD.
- Use of ‘Green Walls’ are included in the Hemsby Neighbourhood Plan, not ‘living walls’ which are quite different. There is not considered to be any conflict with the Great Yarmouth Design Code.

- It is considered that opportunities to potentially retrofit green infrastructure in urban environments is already sufficient addressed through codes PS4 and PS5.

Section 4.4: Include Street trees along movement routes and as part of public spaces (PS5)

Summary of Main Issues Raised

- Sport England – Suggests specific text that states that trees should be positioned carefully so that proposed and existing active travel routes and infrastructure are not blocked.
- Broadland Housing Association (via Bidwells) – Considers that as the criteria should not be ‘expected’ as they go beyond adopted policy. It was further remarked that it is unclear how the ‘expected’ criterion will be benchmarked or assessed and is also dependent upon the adoption requirements of Norfolk County Council which will have significant influence on the ability to satisfy the criterion, which are outside of the control of the Council. It is suggested that the code be removed, or amended to ensure it does not conflict with the highway technical requirements of Norfolk County Council, and also provide further information on how proposals will be required to achieve the criterion in practice.
- Persimmon Homes – Considers that the example trees listed under the code, whilst salt tolerant, are also high-water demand trees. This has implications for their placement and potential damage to building foundations and roads. It is not considered sensible to include and should be left to ecologists to deem what is appropriate on a site-by-site basis. It was also suggested that the term ‘closer to the sea’ is ambiguous and believe more context should be given here.
- Anglian Water – In principle agrees however should ensure that location of street trees take account of minimising impacts on underground utilities. It is advised reference is provided to ‘Trees in Hard Landscapes: A Guide for Delivery’ to ensure the location and placement of street trees avoids root damage and resists root ingress into the sewer system.
- Natural England – Supports provision of street trees along movement routes and helps create opportunities for wildlife in urban areas.

How issues have been addressed

- The third ‘expected’ criterion has been updated for clarity that the position of street trees should be located so as not to block active travel routes and infrastructure.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy A2 and the expectations of NPPF para 131 to include provision of street trees within new developments. Norfolk County Council have been engaged throughout the preparation of the design code and are broadly supportive of the principles of the code requirement. It is considered that the criterion provides clear standards by which to achieve.
- Whilst Persimmons’ concern is acknowledged, the ‘expected’ criterion does not provide a closed list of suitable trees but provide examples which are specifically resilient within the seaside context of the borough. It would be expected that any landscaping/planting strategy would be suitably informed by the surrounding context of the area and the Council will take a balanced view, considering other site-specific considerations, as to the appropriateness of specified trees within a development. Notwithstanding, for greater clarity the expected criterion has been amended to refer to sites within 1km of the sea as being expected to plant salt tolerant tree species.
- Reference to ‘Trees in Hard Landscapes’ has been included within the ‘Useful Section’ of the Design Code. Section 4.3 ‘Street, movement and parking’ has also been amended to ensure that new streets are planned in accordance with the street hierarchy code which includes provision of street trees.

Section 4.5: Create a scale, form and pattern of development that is structured and integrates with the scale of its context (BF1)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ aspects of the code are already covered by adopted policy and should be removed to avoid duplicated. Considers that remaining ‘expected’ criterion go beyond adopted policy and largely repeat criterion listed under CI1, therefore provides little additional benefit. Also considered that the criterion is unqualified and don’t provide a benchmark by which to be assessed. It is suggested that the code be removed, or further information required to demonstrate how proposals will achieve the code in practice.
- Persimmon Homes – Expects that the Area Specific Design Code would be applied as a condition under an outline permission, or that there would be flexibility that is proportionate to the scale and stage of the development.

How issues have been addressed

- It is disagreed that the ‘required’ criterion unnecessarily duplicates adopted policy or standards but provides clarity for the users of the design code on local policy requirements. It is disagreed that the ‘expected’ criterions go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of policies CS1, CS9 and A2 to ensure proposed built forms are of a scale and pattern that integrates with its context. It is considered that the criterions can be adequately demonstrated through supporting layout plans and accompanying planning, and design and access statements.
- The 'expected' criterion is not requiring area specific design codes but highlighting that area specific code requirements (within the Design Code) should be applied when considering building frontages and boundary treatments enclosing the public realm.

Section 4.5: Ensure an appropriate sense of enclosure of streets and public spaces, and clear relationships between public and private space (BF2)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Whilst supportive of the principles as good practice, considers that the criterions should not be ‘expected’ as they go beyond adopted policy. Also considered that the criterion is unqualified and don’t provide a benchmark by which to be assessed against. It is suggested that the code be removed, or further information required to demonstrate how proposals will achieve the code in practice.
- Persimmon Homes – Citing “In lower density locations, the scale of street trees should be at least as tall as buildings when mature”, considers that there should be flexibility that responds to the site circumstances in this case. Otherwise, assurances are sought that there was a framework available that detailed the appropriate species for trees in these types of locations.
- Persimmon Homes – Considers that the recommended ratios of building heights to widths (as provided in Fig 3.2) creates potential conflict with density requirements in adopted policy. Considers that lifting examples from the NMDC without reference to the borough is unjustified and could have significant impact on viability.

How issues have been addressed

- It is disagreed that the ‘expected’ criterions go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of policies CS9, A1 and A2 to ensure proposals provide an appropriate sense of enclosure of streets and public spaces. It is considered that the criterions can be adequately demonstrated through supporting layout plans and accompanying planning, and design and access statements.

- The expected criterion, whilst providing general guiding principles regarding the scale of trees to help enclose spaces, is necessarily flexible (like all 'expected' criteria) to reflect site specific circumstances on a case-by-case basis.
- There is not considered to be a conflict between the recommended ratios of building heights to widths and the density requirements in the adopted Local Plan. The Local Plan sets indicative minimum densities, not maximums. The expected approach to building heights and width ratios would allow for potential increases in density by allowing taller buildings.
- It is acknowledged that the recommended ratios of building heights to widths (as provided in Fig 32) requires further clarity. This has been updated in (now) Fig 34.

Section 4.5: Make efficient and effective use of land through designing to appropriate residential densities and plot ratios (BF3)

Summary of Main Issues Raised

- Badger Building – Questions whether suggested plot ratios have been tested against density aspirations in the adopted local plan as this could run contrary to delivering full housing needs.
- Broadland Housing Association (via Bidwells) – Considers that the code requirements should be removed as this duplicate and goes beyond adopted policy, and that it is not clear what the policy justification or benchmark criterion should be for the various density of development measurements. It is suggested that the code requirements be removed or amended to provide further information on how proposals will be required to achieve the density measurements.
- Persimmon Homes – Considers there to be potential conflict with achieving minimum densities whilst also achieving minimum back-to-back distances and road/street widths on development sites. Clarity is needed on what the main priority should be within new developments in the Borough. It was also queried the relevance of providing the different density measurements listed in the code, in planning applications.
- Hemsby Parish Council – The Parish Council wished for densities to be in line with the Hemsby Neighbourhood Plan Design Code, not the increased amount shown for Hemsby of minimum of 30 per hectare.

How issues have been addressed

- The residential densities are all drawn from the existing Local Plan. The non-residential and mixed-use plots are broad brush but considered to be achievable. As an 'expected' criterion, there is flexibility within the criterion to allow for site specific circumstances to be taken into account were demonstrated by the applicant.
- It is disagreed that the 'required' criterion unnecessarily duplicates adopted policy or standards but provides clarity for the users of the design code on local policy requirements. It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy H3. Regarding density calculations, dwellings per hectare is a blunt way to measure density and can lead to perverse outcomes. Providing different metrics will allow case officers to understand densities in a more holistic way and is not considered to be onerous on applicants to provide (beyond dwellings per hectare measurements).
- The back-to-back distances are fairly standard, however reflecting on local circumstances, the minimum back-to-back distances has been reduced from 25m to 20m and this is considered to better reflect the density ambitions of the borough. Regarding density calculations, dwellings per hectare is a blunt way to measure density and can lead to perverse outcomes. Providing different metrics will allow case officers to understand densities in a more holistic way and is not considered to be onerous on applicants to provide (beyond dwellings per hectare measurements).

- It is considered that BF3 minimum density requirements are consistent with the adopted Great Yarmouth Local Plan. Whilst the Hemsby Neighbourhood Plan Design Code references densities lower than those in the Local Plan, it should be recognised that the Neighbourhood Plan Design Code does not form part of the adopted Neighbourhood Plan. It is a material consideration only.

Section 4.5: Ensure building form and layout are optimized with regard to solar orientation, overshadowing and wind (BF4)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the BF4 criteria should not be “expected” as they go beyond adopted policy. It was suggested that it is also unclear how the requirements can be linked back to Policy A1 (Amenity) of the Local Plan. It was also considered that the criterion is unqualified and doesn’t provide a benchmark to assess against. It is recommended that the code be removed, or further justification provided to understand the relevant link back to Policy A1.

How issues have been addressed

- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A1 and A2. Ensuring developments are designed to optimize daylight, do not overshadow public open space, and help to shelter streets and public spaces to avoid wind tunnel effects are reasonable and justified measures to ensure a high-quality standard, and not least, lead to an unacceptable or excessive impact on the amenity of existing and proposed residents.

Section 4.6: Create active frontages to the public realm (BD1)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the ‘expected’ criterion go beyond adopted policy. It is recommended that the ‘expected’ criterion is relegated to best practice only.
- Hemsby Parish Council – The Parish Council wished to see the alignment of housing/garages to the front of properties, not to the rear as suggested in the Local Plan.

How issues have been addressed

- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy CS9(c) and A2(c) which seeks to ensure positive relationships between existing and proposed buildings, active frontages, and recognisable streets.
- It is disagreed with Hemsby Parish Council’s comment. BD1 does not preclude garages set to the front of properties but seeks to avoid there this would lead to inactive frontages dominating the public realm or street scene.

Section 4.6: Ensure tenure-blind housing development (BD2)

Summary of Main Issues Raised

- Badger Building – Queried the relationship of figure 36 to BD2 as it appears to relate to building in flood zones.
- Broadland Housing Association (via Bidwells) - Accepts that criteria are deemed as good practice but considers that the entirety of the ‘expected’ criteria go beyond adopted policy. It is recommended that the ‘expected’ criterion is relegated to best practice only.

How issues have been addressed

- Figure 36 (now Figure 38 in final version) relates to BD1 which provides further guidance on maintaining active frontages for development in Flood Risk Zone 3. The layout of the

illustration has been amended to make its interpretation and relationship to BD1 more clearly.

- It is disagreed that the 'expected' criterion goes beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS4(c) to ensure that affordable housing is well integrated into development in terms of design and layout.

Section 4.6: Create functional and accessible new homes with sufficient internal space (BD3)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) - Accepts that criteria are deemed as good practice but considers that most of the 'expected' criteria are covered by Building Regulations and should be removed to prevent confusion between the duplication of information. It is recommended that criteria relating to Building Regulations are removed, and that the 'expected' criterion should be amended to 'best practice' only.
- Persimmon Homes – Considers that meeting the M4(2) requirements should reflect the requirements of the adopted Local Plan and Building Regulations. These policies show that flexibility is permitted in certain situations, such as flats that are above ground floor level.

How issues have been addressed

- It is disagreed that the code requirement replicates Building Regulations and should be removed. Building Regulations do not state what proportion of new homes should meet the various standards of accessibility. The code refers to the Buildings Regulations for the full detail. Notwithstanding, as the currently adopted Local Plan does not include a policy requiring National Described Space Standards, this 'expected' criterion has now been amended as a 'best practice' consideration.
- It is acknowledged that the M4(2) criterion within the BD3 is potentially less flexible than the existing adopted policy in that it potentially provides a closed list to circumstances where M4(2) may not be achieved. BD3 has therefore been updated for better consistency with the adopted policy.

Section 4.6: Ensuring adequate daylight and sunlight, and no unacceptable loss of daylight or sunlight to neighbouring existing homes (BD4)

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Design Code needs to be mindful that it is not always viable to just include single aspect homes when balanced alongside daylight/sunlight considerations. Flexibility required in the SPD.
- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the 'expected' criteria go beyond adopted policy. It is recommended that the 'expected' criterion is relegated to best practice only.

How issues have been addressed

- The McCarthy & Stone representation is misinformed as the 'expected' criterion does not seek to include single aspect homes.
- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A2(f) and A1 to provide healthy homes which provide adequate daylight/sunlight and no unacceptable loss of sunlight to neighbouring existing homes. It is considered that the criteria provide clear and justified benchmarks to be considered against.

Section 4.6: Ensure adequate privacy for habitable rooms (living rooms, dining rooms, kitchens, or bedrooms) and private outdoor amenity space (BD5)

Summary of Main Issues Raised.

- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the ‘expected’ criteria go beyond adopted policy. It was further commented that the ‘expected’ criterion has a highly specific nature and therefore may have potential to undermine the ability to meet other criterion including in respect to minimum densities, and particularly with reference to existing brownfield and urban sites where these overly generous back-to-back distances may not be achievable and may adversely affect development viability. It is recommended that the wording of the ‘expected’ criterion is amended for additional flexibility to reflect that it may not always be practicable and feasible to achieve.
- Persimmon Homes – Whilst the aspiration of the criterion is recognised, flexibility is sought to ensure minimum separation distances respond to the site circumstances. It was indicated that no evidence to justify the minimum distances is stipulated and that 20m back-to-back distances between new builds is considered to be more realistic and acceptable.

How issues have been addressed

- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A1 to promote a high standard of amenity for a suitable living environment. Whilst it is acknowledged that the criterion provides specific standards, it should be recognised that these are guiding principles to be considered and where it can be adequately demonstrated by the applicant of site-specific circumstances that this could not be achieved, this would be considered in the overall balance.
- It is accepted that 20m back-to-back distances between new builds is likely to be more realistic and acceptable in the context of the borough. The first and third ‘expected’ criterion has been updated to reflect this.

Section 4.6: Provide sufficient quality and quantity of private outdoor amenity space for residential development (BD6)

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Considers that open space for older people is much less than mainstream housing. Quality of space accessible for passive recreation is more important than formal open space. It is considered that any minimum sizes set for residential outdoor amenity should exempt older people housing schemes but ensure quality and function of amenity space. It was also suggested that in relation to flats/maisonettes, there are other planning issues that restrict incorporation of balconies on flats such as overlooking and that this should be noted in the requirement.
- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the ‘expected’ criteria go beyond adopted policy. It is recommended that the ‘expected’ criterion is relegated to best practice only.
- Persimmon Homes – Considers that the criterion conflicts with density requirements and it is unrealistic to set minimum requirements for private amenity space as it is not reflective of modern densities in the borough or wider county and is unduly prescriptive and could give rise to serious conflict with national policy and the Council’s own minimum density requirements. It is suggested that requirements for balcony sizes can be offset by access to good quality open space and that the Council should exercise sound judgement which allows for flexibility in this part of the design code given that balconies do not always mesh with the context/character of the surrounding areas.

How issues have been addressed

- Qualitative requirements for older people's housing / specialist housing are acknowledged, however it would be inappropriate to exempt this from a minimum requirement as this goes beyond existing adopted policy. The wording of the 'expected' criterion has been amended to provide greater flexibility in the consideration of private amenity space for older persons housing, specialist accommodation.
- Minimum amenity space sizes are in line with many other Local Plans across the country including high density locations. It is not considered unachievable and having adequate amenity space is a very important part of achieving good quality design. As an 'expected' criterion, there is flexibility within the criterion to allow for site specific circumstances to be taken into account where demonstrated by the applicant.

Section 4.6: Provide convenient and discreet refuse storage and utilities to meet user requirements (BD7)Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Accepts that the 'required' criteria are deemed as good practice, but aside from meeting the requirements of the local waste service, there is no benchmark against which development should be assessed. It is also considered that the 'expected' requirements go beyond adopted policy and that lack appropriate benchmarks to assess compliance. It is recommended that appropriate benchmarks are included in the criteria and that the 'expected' criteria should be relegated to 'best practice' only.
- Persimmon Homes – Considered that the 'expected' criterion under the code should only be applicable to flats as larger new build housing developments will have separate areas for refuse storage separate from the dwellings themselves. It is considered that design matters should be judged on a case-by-case basis to reflect the function and form of structures and their prominence in the street scene.

How issues have been addressed

- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS9(i), A2(f) and A1 to ensure refuse facilities are designed in a convenient and discreet manner. It is considered that the requirements can be adequately assessed through submitted layout and plans which indicate their placement on a development site. The 'Useful Resources' under this section provides a link to the Council's requirements for local waste collections.
- It is disagreed that this requirement should only be applicable to flats. There are many examples where refuse storage (and combined cycle storage) is integrated within the building design across all types of housing developments. It is recognised that there may be site specific circumstances where this may not be possible, therefore as an 'expected' criterion, it may be flexibly applied where justified by the applicant.

Section 4.6: Screen external plan and equipment from views from the public realm and from the upper floors of listed buildings (BD8)Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the 'expected' criteria go beyond adopted policy. It is recommended that the 'expected' criterion is relegated to best practice only.
- Persimmon Homes – Considers that any restrictions on locations of utility/meter boxes in unobtrusive locations needs to be applied in recognition of restriction on certain types of dwellings e.g., on terraced houses these must be put on primary elevations.

How issues have been addressed

- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies and only regarded as 'best practice'. These provide recognised qualitative approach to aid the interpretation of Policy A1 and is key to ensuring good quality design and protecting the amenity of neighbouring residents/occupiers.
- Whilst the placement of utility boxes on particular dwelling types is acknowledged, it doesn't mean that these cannot be discreetly positioned or screened, as required by the design code.

Section 4.6: Use boundary treatments that contribute positively to the character of the public realm and wider landscape (BD9)Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the 'expected' criteria go beyond adopted policy. It was also considered that an appropriate benchmark relating to boundary treatments needs to be applied. It is recommended that the 'expected' criterion is relegated to best practice only.
- Persimmon Homes – requests flexibility under the Code as existing hedge lines should be taken into account.
- Hemsby Parish Council - The Parish Council noted that boundary treatments seem to state 1m or below boundaries, yet on page 59 it states below 1.2m

How issues have been addressed

- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies and only regarded as 'best practice'. These provide recognised qualitative approach to aid the interpretation of Policy A2(c) and A2(e). It is considered that the criteria provide clear and justified benchmarks to be considered against.
- With regards to flexibility concerns existing hedge lines, there is nothing in the design code which would prevent this. Therefore, it is considered that the degree of flexibility is already considered.
- With regards to boundary treatments raised by the Parish Council, this is an error in the design code and has been amended to be 1m, consistent throughout.

Section 4.6: Provide external lighting which minimise light pollution while ensuring safety (BD10)Summary of Main Issues Raised

- Broads Authority – Queried whether the design code should really ask if lighting is needed in the first place, rather than going straight to providing lighting.
- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that the 'expected' criteria is relegated to 'best practice' to reflect that this goes beyond adopted policy. It was further suggested that an appropriate benchmark be applied to assess the requirement and that the Council is clear how competing interests (to avoid excessive light pollution/ensure vulnerable user groups feel safe at night) are implemented. It was recommended that the criteria be amended to provide appropriate benchmarks against which they can be assessed and to amend the definition of 'expected' criterion to 'good practice'.
- Persimmon Homes – Considers that some elements under this Design Code are contradictory, as it is difficult to protect dark skies while also potentially providing excessive street lighting.

- Natural England – Considers that the code includes a link to the Institute of Lighting Professionals which has a has useful guidance on mitigating impact through design (ILP Guidance Notes).

How issues have been addressed

- It is agreed that the criterion should be amended to reflect lighting considerations where they are required. This has been updated within the ‘expected’ criterion of the Design Code.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies and only regarded as ‘best practice’. These provide recognised qualitative approach to aid the interpretation of Policy A1 and E6. It is considered that the criteria can be adequately considered and assessed, in most relevant cases, where informed through a lighting assessment.
- It is disagreed that the elements under this section of the Design Code are in conflict. The code says lighting should be proportionate and carefully considered to avoid excessive light pollution. Ensuring safety does not automatically lead to excessive lighting.
- It is agreed that the code should reference the Institute of Lighting Professionals guidance on mitigating impacts through design. This has been included under the ‘Useful Resources’ section of this part of the code.

Section 4.6: Design appropriate deterrents to bird nesting and roosting (BD11)

Summary of Main Issues Raised

- Badger Building – Suggests that the criteria contribute to the national decline in House Martins, and that roofs and eaves overhangs are crucial to the survival of this species in the UK.
- Broads Authority – The code should consider a section on biodiversity enhancements, rather than just doing things which may stop birds from perching, given emerging BNG requirements.
- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the ‘expected’ criteria go beyond adopted policy. It is recommended that the ‘expected’ criterion is relegated to best practice only.

How issues have been addressed

- The issues regarding bird’s species have been considered and the wording of the ‘expected’ criterion has been amended to reflect how the design should consider building forms to deter nuisance bird nesting which creating habitat for threatened species.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies and only regarded as ‘best practice’. These provide recognised qualitative approach to aid the interpretation of Policy A1.

Section 5.1: Great Yarmouth, within the Town Walls

Summary of Main Issues Raised

- Historic England – Welcomes references to Conservation Area and Conservation Area Appraisals being fully read and referenced, and references to the historic environment and heritage assets. However, it was considered that references to heritage assets could be improved in places with stronger references to area’s very distinctive historic character and to explicitly refer to any important heritage assets to provide clearer context.

How issues have been addressed

- Whilst reference to the reading and referencing the Conservation Area Appraisals were included in the draft Design Code, these are in the process of being prepared and cannot yet be referenced. Section 2.4 of the Design Code has been amended to highlight that their emerging status and that when published/adopted should be considered as part of the

informing process for future planning applications. Reference to reading the Conservation Area Appraisals within each of the relevant 'Area specific design requirement' section of the Design Code has been removed.

- Whilst it is acknowledged that a stronger reference of the area's distinctive character should be referred to, it is considered that this would be more appropriate to include within the emerging Conservation Area Appraisal. There is also a risk that referencing specific heritage assets may potentially signal poor imitation development proposal within the area.

Section 5.1: Great Yarmouth, within the town walls - Design Requirements (Building Heights)

Summary of Main Issues Raised

- Broads Authority – Would welcome reference to the making the most of the waterside setting, for example the North Quay area where it is on the boundary of the river and the Broads.
- Historic England – Generally agrees that building heights should be three-storeys but notes that there are smaller scale buildings, and that the Council should consider whether the code requirements should be amended to encourage two-storey development where appropriate.

How issues have been addressed

- With reference to North Quay, the 'Design Requirements' section within this character area already makes references to the North Quay SPD which include specific design principles regarding new development within the North Quay area.
- With reference to building heights, the design requirement references predominantly 3-5 storeys, which implies flexibility in the heights of new developments. However, for enhanced clarity, reference to two-storey development has been amended to reflect that it is 'generally' not appropriate to the urban character of the area.

Section 5.1: Great Yarmouth, within the town walls - Design Requirements (landscape design and materials)

Summary of Main Issues Raised

- Historic England – Considers that the principle of conserving and enhancing the setting of the Town Wall (Scheduled Ancient Monument) be reflected further within the requirement. It is also suggested that the requirement should be revised to incorporate references to the public realm and quality materials and additional photographs showcasing the locally prevalent materials and building details typical of the character area.

How issues have been addressed

- Reference to the Town Walls has been included within the 'landscape design and materials' section. Fig. 46 (now Fig 47) provides a range of example quality materials and building details within the character area.

Section 5.2: Great Yarmouth Seafront

Summary of Main Issues Raised

- Historic England – Welcomes references to Conservation Area and Conservation Area Appraisals however disappointed that these are not required to be being fully read and referenced. It was also suggested that references to heritage assets could be improved in places with stronger references to area's very distinctive historic character and remarkable collection of seaside architecture, and to explicitly refer to any particular important heritage assets to provide clearer context.

How issues have been addressed

- Whilst reference to the reading and referencing the Conservation Area Appraisals were included in the draft Design Code, these are in the process of being prepared and cannot yet be referenced. Section 2.4 of the Design Code has been amended to highlight that their emerging status and that when published/adopted should be considered as part of the informing process for future planning applications. Reference to reading the Conservation Area Appraisals within each of the relevant 'Area specific design requirement' section of the Design Code has been removed.
- Whilst it is acknowledged that a stronger reference of the area's distinctive character should be referred to, it is considered that this would be more appropriate to include within the emerging Conservation Area Appraisal. There is also a risk that referencing specific heritage assets may potentially signal poor imitation development proposal within the area.

Section 5.2: Great Yarmouth Seafront - Design Requirements (Building Heights)Summary of Main Issues Raised

- Historic England - With reference to Marine Parade/South Beach Parade (east-side) queried whether having no height limitations for buildings is suitable, recommending that parameter be set while retaining enough flexibility to accommodate taller designs if necessary.

How issues have been addressed

- Whilst this is acknowledged, such an approach is potentially problematic in that it could inadvertently lead to an increase in many big blocky buildings, as any height suggestion would likely need to be set quite high. Notwithstanding, the wording in this section has been amended to reflect that whilst height parameters are not appropriate, building heights and massing should be carefully determined through site-specific analysis to limit impacts on views and the setting of heritage assets.

Section 5.2: Great Yarmouth Seafront - Design Requirements (Car Parking)Summary of Main Issues Raised

- Historic England – Fully supportive of the aspiration to limit traffic and parking.

How issues have been addressed

- Support welcomed. No further changes have been made.

Section 5.2: Great Yarmouth Seafront- Design Requirements (Street elevation & design)Summary of Main Issues Raised

- Historic England – Welcomes reference to ornamental and decorative detailing but consider that this requirement is desirable rather than optional. The code should be amended to reflect this. Also considers that there might be a potential conflict between this requirement and the consideration of maintenance challenges posed by materials exposed to the marine environment.

How issues have been addressed

- It is agreed with Historic England that this should be desirable. The wording of this requirement has been updated to reflect.

Section 5.2: Great Yarmouth Seafront - Design Requirements (Building design and materials)Summary of Main Issues Raised

- Historic England - With reference to Marine Parade/South Beach Parade (east-side) it was noted that requirement for materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance. However, concern that this

may conflict with street elevation requirements, particularly when using materials and detailing that reflects local vernacular. It is considered that the text be amended to encourage consideration of the maintenance implications associated with these materials.

How issues have been addressed

- Whilst acknowledged, there is not considered to be conflict in the design code as this will be determined on case-by-case basis.

Section 5.2: Great Yarmouth Seafront - Design Requirements (Landscape design and materials)

Summary of Main Issues Raised

- Historic England – Welcomes the design requirement, however, suggests modification to encompass improvements to the public realm and high-quality materials.

How issues have been addressed

- This has not been considered necessary as the landscape design requirement does include reference to the public realm and need to improve the quality of the character area.

Section 5.3: Gorleston town centre and historic core

Summary of Main Issues Raised

- Historic England – Welcomes references to Conservation Area and Conservation Area Appraisals being fully read and referenced.

How issues have been addressed

- Whilst reference to the reading and referencing the Conservation Area Appraisals were included in the draft Design Code, these are in the process of being prepared and cannot yet be referenced. Section 2.4 of the Design Code has been amended to highlight that their emerging status and that when published/adopted should be considered as part of the informing process for future planning applications. Reference to reading the Conservation Area Appraisals within each of the relevant 'Area specific design requirement' section of the Design Code has been removed.

Section 5.3: Gorleston town centre and historic core - Design Requirements (Building design and materials)

Summary of Main Issues Raised

- K. Newnham – Queries the non-use of uPVC windows, doors, fascias and cladding.

How issues have been addressed

- It is acknowledged that the non-use of uPVC when replacing windows, doors etc may have cost implications, and their use may be an appropriate material in specific circumstances. The criterion has been amended to remove reference to uPVC windows, doors, fascias and cladding as not being general acceptable.

Section 5.4: Gorleston Seafront

Summary of Main Issues Raised

- Historic England – Welcomes reference to the Gorleston Conservation Area, but that it is not clear whether the Conservation Area Appraisal exists and whether development proposals are required to be read or referenced by these.
- Badger Building – Identifies the photographs presented under Fig 55 as showing recent infill and with no real regard for quality.

How issues have been addressed

- Whilst reference to the reading and referencing the Conservation Area Appraisals were included in the draft Design Code, these are in the process of being prepared and cannot yet be referenced. Section 2.4 of the Design Code has been amended to highlight that their emerging status and that when published/adopted should be considered as part of the informing process for future planning applications. Reference to reading the Conservation Area Appraisals within each of the relevant 'Area specific design requirement' section of the Design Code has been removed.
- Figure 55 (now Figure 57 in the final version) illustrate the general uniform scale and development pattern with individual variety of dwelling design which is considered to bring character and liveliness to the street scene. Whilst it is recognised that some recent infill within the area is potentially less well-designed than others, the specific design requirements listed within this section seeks to provide greater clarity on future design expectations here.

Section 5.5: Great Yarmouth and Gorleston port and industrial areasSummary of Main Issues Raised

- Historic England – Welcomes references to the historic environment and heritage assets. However, it was considered that references to heritage assets could be improved in places with stronger references to area's very distinctive historic character and to explicitly refer to any particular important heritage assets to provide clearer context.
- National Grid Property Holdings (via First Plan) – As owner of the gasholder, welcomes the mixed development of various scale within the area. Notes that the gasholder is unique in its scale and appearance with long views available across Great Yarmouth and therefore a significant consideration in the design of future development proposals. The representation supports that Design Code in encouraging high-density development, and where appropriate, high rise residential dwellings amongst the uses suitable for this part of Great Yarmouth.

How issues have been addressed

- Whilst it is acknowledged that a stronger reference of the area's distinctive character should be referred to, it is considered that this would be more appropriate to include within the emerging Conservation Area Appraisal. There is also a risk that referencing specific heritage assets may potentially signal poor imitation development proposal within the area.
- National Grid Property Holdings comments are welcomed. The area characteristic summary of this section has been amended to include reference to the Victorian Gas Holder.

Section 5.5: Great Yarmouth and Gorleston port and industrial areas - Design Requirements (Building design & materials)Summary of Main Issues Raised

- Historic England – Welcomes the section's character analysis of earlier industrial buildings, highlighting that new development often does not take design cues from the attractive older industrial buildings that could help form a strong reference point for the scale and articulation of new buildings. However, Historic England further commented that the section's character analysis did not appear to have influenced the corresponding 'building design and material requirements' for the character area.

How issues have been addressed

- It is disagreed with Historic England. The 'building design and material requirements' in this section of the code are considered to have been influenced by the industrial character in terms of scale, form and relationship to the street etc.

Section 5.7: Area Types - Terraced streets and squares

Summary of Main Issues Raised

- Historic England – Agrees that later development has not consistently reinforced the existing character of the area, however it is considered that the text should be strengthened by making it explicit that new developments will be expected to actively address this issue by reinforcing and strengthening the existing (historic) character, where appropriate. Also commented that the caption related to Fig 65 which suggests that finding suitable new uses for historic terraces can be challenging – is disagreed with and unhelpful.

How issues have been addressed

- It is agreed with Historic England that the new developments should be expected to actively address the issue by reinforcing and strengthening the existing (historic) character. This has been included within the 'Development Pattern' design requirement in this section of the Design Code.
- It is disagreed that the caption in relation to Fig.65 (now Fig.67 in final version) should be deleted, as this is a recognised problem within these specific character areas.

Section 5.10: Character Areas - Historic Village Centres

Summary of Main Issues Raised

- K. Newnham – Raises sustainability issues regarding recently developed and future planned developments within the borough's villages.

How issues have been addressed

- These general comments relate to the Local Plan process rather than the Design Code specifically. No changes have been made to the Design Code.

Section 6.1: New Housing Developments

Summary of Main Issues Raised

- K. Newnham – Cites material colour use on photographs provided under Fig. 73
- Badger Building – Cites appropriateness of photographs provided under Fig.74 as these are from high-end development and queries their realism in the context of the borough.

How issues have been addressed

- The photos provided under Fig. 73 (now Fig. 75 in final version) are intended to illustrate common issues in new estate design rather than provide examples of appropriate material treatment. All materials and details will be expected to reflect the local vernacular unless a clear design-led rationale is presented for an alternative approach. Section 2.3 of the Design Code provides a useful indication of the historic building materials commonly used within the borough, whilst Section 5 provides more detailed descriptions of materials used in existing character areas.
- The Design Code includes examples of housing development across Norfolk and more broadly across Suffolk and Essex. Regarding 'high-end' developments, the examples include social housing and development that have included a lot of affordable housing. It is disagreed that good design costs money, and it is important to include images that are recognised in the development industry and broadly high-quality schemes so that the bar is set high.

Section 6.1: New Housing Developments - Relationship to Landscape

Summary of Main Issues Raised

- Broads Authority – Raises typographical errors relating to first bullet point.

- Persimmon Homes – Raised typographical errors relating to first bullet point and also questions whether it appropriate or desirable in urban design terms to promote rear boundaries as an appropriate mechanism to face on to the footpaths and cycleways from a visual interest and natural surveillance perspective.

How issues have been addressed

- Typographical corrections have been incorporated across the entire design code.
- The wording of this section has been amended to clarify that in a rural settings it is preferable for rear gardens to form the boundary to the rural landscape, and that the use of close boarded fencing onto the landscape should be avoided, instead natural boundary treatments should be used.

Section 6.1: New Housing Developments – Integration with ‘host’ community

Summary of Main Issues Raised

- Persimmon Homes - There is a focus on seamless integration with existing communities in terms of networks of streets and routes to local destinations. Whilst this is acknowledged, attention is drawn to the requirements of SM2 and how that could run contrary to this aspiration in terms of form and character.

How issues have been addressed

- It is disagreed with Persimmon Homes. An integrated movement network is key to the design code principles. This doesn't mean that development needs to be detrimental to character.

Section 6.1: New Housing Developments – Pattern of development

Summary of Main Issues Raised

- Persimmon Homes - Reference is made to drawing on the built character of existing development in this Section, however this is considered to run contrary to a number of the requirements of the Code in relation to the form, layout and typologies set out earlier in the document and need to reconciled with settlement specific circumstances and aspirations for the built form in that area, if truly successful integration is to be achieved.

How issues have been addressed

- It is disagreed with Persimmon Homes. There are a number of ways to draw upon and be influenced by local character while also meeting contemporary needs in terms of matters such as parking, SuDS etc.

Section 6.3: New industrial, commercial and retail development

Summary of Main Issues Raised

- Broads Authority – Questions appropriateness of just referring to retail and commercial units in out-of-town locations and whether this should simply refer to all types of industrial, commercial, and retail uses. It was also queried whether the design code should really ask if lighting is needed in the first place, rather than going straight to providing lighting.

How issues have been addressed

- It is agreed that the section should focus on all new industrial, commercial, and retail developments, however it should be recognised that the design and layout of such development outside of town locations often present particular challenges. This section of the design code has been amended to reflect the comment.
- In terms of lighting, the need for external lighting would be a matter dealt with through existing local plan policies. Notwithstanding, this section of the design code has been updated to clarify that where external lighting is needed, that this should be carefully designed.

Section 6.4: Development in the rural area

Summary of Main Issues Raised

- Badger Building – Cites the comparability of photographs presented under Fig.76 and their quality.

How issues have been addressed

- This is acknowledged and additional comparable photographs have been included in the final version.

Section 6.5: Holiday Parks

Summary of Main Issues Raised

- Bourne Leisure (via Lichfields) – Considers further clarity within the section as to what borough-wide requirements are most applicable to holiday parks as they will not all apply. Whilst it is generally agreed that boundary treatments, screening, external lighting are the key design considerations, it was considered that reference to mitigation of recreational disturbance appears to go beyond purely design matters. It was requested that the first bullet point under ‘Landscape Setting’ is amended as “Minimise recreational disturbance to natural wildlife/landscape locations through the design of enhancements to suitable alternative natural greenspace for recreation and/or to the movement network/connection to these spaces” as this would provide better consistency with adopted policies CS8, CS15 and GSP5.
- Bourne Leisure (via Lichfields) – It is considered that the examples provide under Fig.77 demonstrates that appropriate boundary treatments will differ on a case-by-case basis and that not one singular approach is advocated. However, it is considered that in some circumstances ‘close boarded fencing’ may be the most appropriate boundary treatment, for example where Holiday Park boundaries abut the gardens of neighbouring properties.

How issues have been addressed

- It is acknowledged that some part of the borough-wide design code requirements may not a relevant consideration for the design of Holiday Park. Section 6.5 has been amended to make this clearer.
- The first bullet point under ‘landscape setting’ as has been amended to reflect suggestion and consistency with Policies CS8, CS15 and GSP5.
- The second bullet point under ‘landscape setting’ has been amended to reflect instances where close board fencing is least likely to be appropriate.

General Comments

Summary of Main Issues Raised

- East Suffolk Council, Active Norfolk, Norfolk County Council Public Health, Marine Management Organisation, National Highways, N. Harris – Generally supportive of the Design Code throughout or offered no comment.
- J. Buchanan – Considers the new buildings should incorporate swift bricks and hedgehog highways.
- M. Castle – Considers design code should pay special attention to the need for a Controlled Parking Zone in the Town centre. Without this approach, considers that there will be difficulty in getting support of local Town Centre residents and businesses for significant new development.
- M. Clarke – Considers that whilst the document is very detailed, questions how practical it is to use examples from around the country as to where GY wants to be, and what has been done to ensure that these examples have made that environment better for those communities.

- Water Management Alliance – Generally supportive on emphasis on reducing water, rainwater harvesting, greywater recycling, reference to meeting LLFA runoff rate and SUDS to CIRIA SuDS manual. Supports encouragement of maximising infiltration, use of above ground multifunctional SuDS integrated into design, creating/retaining watercourse, avoiding fencing around watercourses. All are welcome steps towards more sustainable water management.
- Norfolk County Council Children Services – Considers that the Design Code should include design requirements for new schools, based upon the design guidelines set out in the DFE Building Bulletin Guideline.
- Sport England – considers that the draft design code should be assessed against the ‘Active Design Checklist’ to ensure that it fully reflects the expectations and considerations for Active Travel. It was also suggested that the Active Design Guidance is included within the ‘Useful Resources’ section in the relevant areas of the Design Code.
- Hemsby Parish Council – Were disappointed that having spent time to adopt their own Neighbourhood Plan and Design Code to adoption stage in June 2023, only to consider that a number of them were undermined by GYBC Design Code. They considered that this seeks to dilute the vision of Hemsby’s residents that was formulated using their responses and desires for future planning in Hemsby.
- K. Newnham – Considers that with regards to building styles, a number of the examples are poor and would appear that developers should look to the Netherlands and maintain a more traditional style.

How issues have been addressed

- Regarding swift bricks etc – Design Code requirement PS4 ‘improve biodiversity on and around the development site’ include a number of ‘expected’ design criterion which seeks to encourage habitat creation in the design of buildings and spaces. This includes potential integral bird boxes and allowing the movement of small mammals including hedgehogs.
- Regarding Controlled Parking Zone, the Design Code cannot introduce new policies, only provide additional interpretation and guidance on existing adopted policies or parking standards.
- The Design Code includes examples of housing development across Norfolk and more broadly across Suffolk and Essex. Many of the examples include social housing and development that have included a lot of affordable housing. It is important to include images that are recognised in the development industry and broadly high-quality schemes to that the bar is set high.
- Whilst it is acknowledged that the design and layout of schools are very important, it has been considered not necessary to include this within the code as future designs are set out under existing guidance and managed through the Local Education Authority
- Reference to the Active Design Guidance is already included within the ‘Useful Resources’ section of 4.3 ‘Streets, movement and parking’. The Design Code has been updated by including reference to the Active Design Guidance under the ‘Useful Resource’ section in 4.4 ‘Public open space, nature and water’.
- It is disagreed with Hemsby Parish Council. It is considered that the two design codes are quite similar in many respects, as demonstrated with respect to earlier comments addressed within this consultation statement.

General Comments – Principle of Design Codes

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Raises general concerns that design code requirements may introduce unnecessary financial burden and introduce new planning policies, contrary to National Planning Practice Guidance.

- Badger Building – Considers that the Design Code draws heavily on the National Model Design Code without analysis to justify the outcomes.
- Broadland Housing Association (via Bidwells) – Generally considers that a number of the draft codes unnecessarily duplicate the requirements of adopted policies, building regulations and matters covered by Statutory Consultees and largely fails to provide further guidance on how the adopted policies will be delivered. Suggests that the volume of codes within the document be reduced.
- Persimmon Homes – Consider that the Design Codes may be treated as prescriptive and inflexible and seek assurances that the Council will allow flexibility and exercise a certain amount of judgement over proposals wherein the applicant can demonstrate that the site requires departures and where this can be facilities where justification is provided. Also raised concerns that the aspirations of the Council may not meet the requirements of the NCC Highway Authority and seek certainty that the Highway Authority will adhere to any adopted guidance such as the Design Code.

How issues have been addressed

- The Design Code includes standards which are based upon an adopted policy requirement and therefore already tested through the Local Plan process, and those which are subject to discretion and may need to be balanced against other aspects of design. Therefore, it is not considered that the Design Code introduces new planning policies or unnecessarily add to the financial burden on developments.
- The introductory section of the Design Code has been updated to reflect how the design code meet the National Model Design Code requirements and expectations.
- As demonstrated in response to many of the earlier comments made by Broadland Housing Association (via Bidwells) and Persimmon Homes, the code provides additional detail on how to comply with the policies set out in the Local Plan, using recognised qualitative design-based approaches. Where considered necessary, the design code has been updated to include additional detail to help benchmark the 'required' and 'expected' based criteria. The Council considers that the volume of codes within the document is proportionate and justified.
- As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal and in some cases, applicants may demonstrate that it would be unfeasible or unviable to be fully policy compliant in every detail, or that betterment can be achieved via different approach. However, the onus is on applicants to justify their approach in these cases.

Appendix 1 – ‘Final Draft’ Consultation Original Representations

Respondent: Marine Management Organisation

Thank you for your invitation to participate in the consultation for the final Draft Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) Consultation.

No further comment is required from the MMO regarding the modifications, we do however advise that you consider any relevant policies within the [East Marine Plan Documents](#) in regard to areas within the plan that may impact the marine environment, including the tidal extent of any rivers. We recommend the inclusion of the East Marine Plans when discussing any themes with coastal or marine elements.

When reviewing the East Marine Plans to inform decisions that may affect the marine environment, please take a whole-plan approach by considering all marine plan policies together, rather than in isolation.

Respondent: National Highways

Thank you for consulting National Highways on the abovementioned Great Yarmouth Design Code SPD.

National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

It has been noted that once adopted, the SPD, will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within close proximity to the SRN and will assess the impact on the SRN of a planning application accordingly.

Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have a severe impact on the operation of the trunk road and we offer No Comment.

Respondent: J. Buchanan

I'd like to see our borough legislate that in all future developments, new buildings incorporate Swift bricks to help these endangered birds find nest sites.

Also, Hedgehog highways to be used in boundary fence panels/ concrete gravel boards.

Respondent: McCarthy & Stone (via Agent: Planning Bureau)

Thank you for the opportunity to comment on the Great Yarmouth Design Code Draft SPD, June 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK. Please find below our comments on the consultation.

The Council should initially note that paragraph: 008 Reference ID: 61-008-20190315 of PPG on Plan Making states 'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan.....They should not add unnecessarily to the financial burdens on development'.

We are concerned that many of the design code requirements may introduce an unnecessary financial burden on development and therefore be contrary to PPG. The Council should ensure that they consider the draft design code in the context of ensuring that requirements do not add to the financial burden of development.

Policy CC5: Reduce embodied carbon emissions resulting from construction.

Policy CC5 requires development to retain and reuse existing structures where this is the most carbon efficient, where it can be suitably adapted, and the structure contributes to the local area. The policy area also requires an embodied carbon assessment to be submitted alongside applications.

Given the requirements of para 008 Reference ID: 61-008-20190315 of PPG on Plan Making as detailed above, the introduction of an embodied carbon policy must not be so inflexible that it introduces a financial burden and deems sites unviable. Any SPD requirement needs to ensure this to make sure it is consistent with NPPF/PPG.

The Council should note that new development will often be far more sustainable in many circumstances including building fabric and by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site. The Council also need to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration as in our experience this is not yet readily available from the majority of suppliers.

CC2 Minimise active heating and cooling requirements through passive design and BD4: Ensure adequate daylight and sunlight for new homes, and no unacceptable loss of daylight and sunlight to neighbouring existing homes.

Policy CC2 requires proposals to minimise active heating and cooling requirements through passive design. This design feature requires single aspect homes and for south and west facing homes to prevent overheating. Policy BD4 looks to ensure adequate daylight and sunlight. The Council need to be mindful of how overheating is balanced alongside daylight and sunlight and accept that it is not always viable to just include single aspect homes especially when balanced alongside daylight and sunlight, so some flexibility needs to be provided within the SPD.

BD6 Provide sufficient quality and quantity of private outdoor amenity space for residential development.

The Council should note that open space needs of older people are much less than for mainstream housing. For older people the quality of open space either on site or easily accessible for passive recreation is much more important than formal open space. If the Council decide to set a minimum size for residential outdoor amenity open space the SPD should provide an exemption for older people's housing schemes but ensure such proposals, consider the quality and function of the amenity space instead. With respect to flats and maisonettes it should also be noted that there are often other planning issues that restrict the incorporation of a balcony on flats such as overlooking, and this should also be noted with the policy.

Thank you for the opportunity for comment.

Respondent: Water Management Alliance

Thank you for consulting the WMA on the Final Draft Great Yarmouth Borough-Wide Design Code SPD. Great Yarmouth Borough falls partially within parts of the Internal Drainage Districts (IDD) of the Broads (2006) Internal Drainage Board (IDB) and the Waveney, Lower Yare and Lothingland IDB, members of the WMA. Therefore, the Board's Byelaws apply to any development within a Board's area.

The principal function of an IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. Main Rivers within the IDB are regulated by the Environment Agency.

The area outside the Boards' IDD falls within the Boards' watershed catchments (meaning water from this area will eventually enter the IDD). The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.

Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents.

Having reviewed the Final Draft SPD, I am pleased to note an emphasis on reducing water use through rainwater harvesting and greywater recycling. It is also positive to see reference to the requirement for developments to meet the LLFA's requirements with regard to runoff rates, and that SuDS should be designed to the requirements of the CIRIA SuDS manual. The encouragement of maximising infiltration, use of above ground and multifunctional SuDS integrated into design, creating, and retaining access to watercourses including buffer zones for maintenance, and avoiding fencing around water features such as watercourses are all supported by the Boards as steps towards more sustainable water management.

I would note that, as above, the Boards are regulators of ordinary watercourses in their IDD. Per the Board's Byelaws, any alteration to watercourses, works within 9 metres (BIDB) or 7 metres (WLYLIDB) of Board Maintained watercourses, or introduction of water into a watercourse will require the Board's consent within an IDD. This is not to supersede the regulation of the LLFA or the EA, but alongside with a view to providing extra protection to the more vulnerable areas the Boards encompass. I would suggest that the Board's regulation could also be referenced within CC7 in particular. I'd be happy to discuss with you further how this could be included.

Respondent: Badger Building

In December 1973 Essex County Council unwittingly published the first 20th century Design Code for residential development, as it sought to encourage developers to move away from the more rigid street patterns which had come to dominate housing development in the post war boom period of the 1950's and 60's. Intended as a guide for that County and aiming to increase an emphasis on vernacular design and materials, along with a more informal approach to housing layouts, it rapidly became the go to guide for both planning authorities and developers. The housing layouts of the 21st century remain wedded to the principles set out in that document and its influence can be seen throughout the country, and therein lies the problem with design guidance or design coding.

The Great Yarmouth Design Code draws heavily on the principles of the recently published National Design Code, whilst omitting the analysis suggested to provide the justification for the outcome. The problem is of course that if the National Design Code is to be followed then the analysis isn't really supporting the outcome as the outcome is largely determined already.

A brief look at the Design Code produced by Aecom for the Carlton Colville Neighbourhood Plan will show the same proposed street sections and frontage layouts and similar plot ratios. Without providing further evidence I think it is fair to say that many other Design Codes will produce the same outcomes. It seems that the wheel moves full circle from the plethora of Essex Design Guide copies produced throughout the land, with the resulting impact on layouts; to a new normal, sketched out (quite well it is fair to say) by central government and repackaged by consultants as something unique for each Council's own use.

So, we move away from informality and replace it with formality, based for the most part on grid squares, with long rows of frontage development and using a road pattern with significant amounts of street tree planting, which up till now had been deemed unacceptable by the highway authority.

The first question to ask is – Has the highway Authority signed up wholeheartedly to the Design Code as published, and will it be providing a suitably modified technical document of its own covering the necessary highway design amendments necessary to deliver the new design agenda. See especially pages 33-37. Without this, this new approach to the design of the built environment where it interfaces with the technical aspects of highway construction, will be doomed. There must be 100% buy in to the Design Code from the Highway Authority.

Question two is – Have the plot ratios suggested been tested against density aspirations in the local plan, to see if the two match up? There is no point in having plot ratios and minimum plot widths if the resulting layouts will not deliver, with an appropriate mix of housing for a site, the numbers allocated in the local plan.

Question three – Just what is wrong with developers’ standard house types. The Code pours cold water on these. How impractical. Two responses arise here – firstly, for the most part developers house types can be elevated to suit a variety of locations and layouts. Secondly, it quite simply would not be practical to have even on an estate of say 25 houses, 25 different house types all with different components. The logistics of materials ordering, and construction supervision render even that scenario impossible. Now scale that up to a site of a 100 or perhaps 350 or more and it is easy to see the shortcomings of this approach. Developers rely on the bulk ordering of components of all sizes to deliver affordability across their product range. Trying to convert the mass building of homes into the mass building of custom-built homes quite simply will not work.

Question four – Why are so many examples shown in photographs taken either at high end housing locations in the southeast, Cambridge and even Holland? Was it that the authors were insufficiently familiar with good design examples locally to support their text? Or just lazy and reverted to their photo archives. These examples do not sit well in the local housing market, where land values will not support the aspirational materials, they are often intended to show case.!

It is perhaps worth noting that when considering materials that quality often has a higher price. Badger recently considered replacing the plastic windows in one of its mid-market properties, with aluminium ones, the exercise showed a £6000 per dwelling increase in price, even allowing for bulk purchase. Taken across a 100-house scheme that could easily add nearly a million pounds to build costs, reducing land values by a similar amount. That doesn’t do a lot for viability, regardless of the aesthetic desirability.

I include photographs at the foot of the text from the edge of Norwich, of a development more typically espoused by the Design Code which exhibits both good design and a range of good quality materials. Use of such local images, (and I could have found more in just a day around Norwich and its surrounding villages) could have amply illustrated the intentions of the design guidance, without the claim easily arising that those examples quoted are aspirational, elitist, or even worse foreign!

Considering the details of some of the policies I make the following comments:-

Policy CL 3 seeks a statement of the clear design approach for each scheme. Given the very obvious constraints and aspirations of the code, how much latitude will there be for deviation from what might otherwise be seen as a fairly prescriptive document, given that the policy seeks “a distinctive and place specific identity”?

Policy SM4 seems to assume 100% bike ownership amongst the population. This is unrealistic. As of August 2022, Government figures tell us that cycle ownership is presently at 45% for those over 5 with usage levels being around 10% of the population. Even at 75% of bed spaces this policy would

be excessive. I understand the need to shift transport on to low carbon solutions and the bicycle is recognised being ideal for journeys of 6 miles or less. But cycling for transport is not going to be the mode for 100% of the population as an answer to the climate crisis.

What is the relationship of figure 36 to policy BD2. It seems to relate to building in flood zones.

Policy BD 11 is contributing to a national decline in house martins. Roof and eaves overhangs are crucial to the survival of this species in the UK.

The choice of photographs on page 80 shows recent infill, with no real regard for quality. There must be better examples.

The photographs on page 111 are all from high end developments – see my earlier comments re the suitability of chosen images.

The photographs on page 115 are not really comparing like with like. – the second picture is of questionable quality. It is difficult to see beyond the cabbages in the foreground.

Respondent: Historic England

Thank you for consulting Historic England on the final draft Great Yarmouth Borough-wide Design Code Supplementary Planning Document (SPD). As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on the consultation document at this stage.

General Comments

Overall, we welcome the preparation of the Design Code SPD which is clear and succinct. We consider that the proposals will encourage better development that will enhance the ability for people to appreciate Great Yarmouth's unique heritage and improve and enhance the setting of historic buildings and monuments within the Borough. We have however identified some areas where the SPD could be improved, and these are discussed below.

2.3 Local building materials

While we welcome this section on local building materials, we consider that it could be enhanced by including photographs showcasing the material palette, along with illustrated examples of buildings that utilise these materials.

2.4 Heritage designations and assets

This section could be improved by making it more Great Yarmouth-specific. Providing details about the number of listed buildings (LBs), scheduled monuments (SMs), conservation areas (CAs), and heritage at risk (HAR) within the Borough area would add local context. Additionally, it would be helpful to mention here that heritage assets can be harmed (and enhanced) by development within their settings.

4.2 Context and identity

We welcome the references to the historic environment and heritage assets within this section, as well as the numerous requirements with regards context and identity; CI2 (Conserve and enhance the significance of heritage assets); and CI3 (Create a positive and distinctive sense of place for new development).

With regards CI4 (Use external materials and detailing which complement the local context and are appropriate for the local climate), while we welcome the requirement that new development should use materials and details which reflect the local vernacular, there might be a potential conflict with

the requirement that the materials and details used must be robust and suitable for the local climate. This is especially relevant in area 5.2, Great Yarmouth seafront. While we understand the rationale for this requirement, we suggest the text is amended to encourage consideration of the maintenance implications associated with these materials and details so that new development reflects the local vernacular while also being suitable for the exposed marine environment.

Character Areas

Overall, we welcome the analysis and requirements relating to the six-character areas. However, we request that the Council reviews these to ensure consistency of wording in relation to Conservation Areas, and, in particular, checks whether all Conservation Area Appraisals (CAAs) are properly referenced in the text where they exist. We have identified the following discrepancies:

- 5.1 Great Yarmouth, within the town walls - *'It includes several Conservation Areas, which are well described by the corresponding Conservation Area Appraisals.... These should be fully read and referenced in relation to any development proposals at any scale'.*

We welcome that the reference to the Conservation Areas and that CAAs should be fully read and referenced.

- 5.2 Seafront - *'the Seafront Conservation Area and is well described in the Conservation Area Appraisal, and site-specific policies in the Local Plan also apply to parts.*

We welcome the reference to the Seafront Conservation Area and corresponding CAA but are disappointed that development proposals are not required to read or reference these.

- 5.3 Gorleston town centre and historic core - *'Its corresponding Conservation Area Appraisal and Management Plan should be fully read and referenced in relation to any development proposals within the bounds of both the Conservation Area and its proposed extensions'.*

We welcome that the reference to the Conservation Areas and that CAAs should be fully read and referenced.

- 5.4 Gorleston seafront - *'The majority of the Gorleston seafront is within the Gorleston Conservation Area Extensions.'*

We welcome the reference to the Gorleston Conservation Area, but it is not clear whether a CAA exists, and if it does whether development proposals are required to read or reference these.

As can be seen there is considerable variation regarding how Conservation Area Appraisals are referenced across character areas and how development proposals should address them. We understand that these discrepancies may partially stem from the fact that some of the Conservation Area Appraisals are only available as paper documents in the Council offices and are not available digitally or have yet to be formally adopted/published; for those CAAs it would be helpful if the code summarised and incorporated the key findings of the report. This would clarify the key issues and how developers should address them. Where CAAs have yet to be formally adopted/published this should be made clear in the text.

5.1 Great Yarmouth, within the town walls – General

We welcome the references to the historic environment and heritage assets. However, we suggest that this could be improved in places with stronger references to the area's very distinctive historic character. Specifically, it would be beneficial to explicitly name any particularly important heritage assets (designated or non-designated) to provide clearer context.

5.1 Great Yarmouth, within the town walls – Height and massing

While we agree that building heights are generally three-storeys, particularly if they include roof space and above, it's worth noting that there are some smaller scale buildings, primarily located to the north and south. The Council should consider whether there are any instances where two-storey development could be appropriate since the current text might create challenges in cases where this (two-storey development) could be beneficial and amend the code accordingly.

5.1 Great Yarmouth, within the town walls – Landscape design and materials

While Fig. 45 highlights that the setting of the town wall Scheduled Monument is very poor in many areas, it is disappointing that this is not reflected in the landscape design and materials requirement. The code should be amended to make it clear that any development proposals within the vicinity of the town wall will be expected to conserve and enhance its setting. Additionally, we believe that the requirements should be revised to incorporate references to the public realm and quality materials. Finally, and in common with the other character areas, we recommend including additional photographs showcasing the locally prevalent materials and building details typical of the character area, along with illustrated examples of buildings that utilise these; this will provide greater clarity and clearer context.

5.2 Great Yarmouth Seafront – General

In common with the other character areas, we welcome the references to historic environment and heritage assets. However, we suggest that this could be improved in places with stronger references to the area's very distinctive historic character. Specifically, we recommend highlighting the area's remarkable collection of seaside architecture. Moreover, it would be beneficial to explicitly name any particularly important heritage assets (designated or non-designated) to provide clearer context.

5.2 Great Yarmouth Seafront – Height and massing

Regarding Marine Parade/South Beach Parade (east side), we note that due to the nature of seafront attractions, height parameters are not appropriate but building heights and massing should be carefully determined to limit impact on views and setting of heritage assets. While we understand the rationale for this, we wonder if having no height limitations for buildings is suitable. In light of this, we recommend that parameters be set while retaining enough flexibility to accommodate taller designs if necessary.

5.2 Great Yarmouth Seafront – cycle and car parking

We support the aspiration to limit traffic and parking.

5.2 Great Yarmouth Seafront – street elevation and design

We welcome the reference to ornamental and decorative detailing but consider that this requirement is desirable rather than optional. The code should be amended to reflect this. As mentioned below, there might be a potential conflict between this requirement and the consideration of maintenance challenges posed by materials exposed to the marine environment.

5.2 Great Yarmouth Seafront – Building design and materials.

With regards to Marine Parade/South Beach Parade (east side), we note the requirement that materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance. As discussed in 4.2 (Context and Identity) while we understand the rationale for this requirement, we are concerned that there might be a potential conflict with the street elevation design requirement, discussed above. This is especially relevant when it comes to using materials and detailing which reflect the local vernacular (CI4).

As described on page 69 of the code, this area features many characterful and elaborate buildings with bold shopfronts; upper floors typically have projecting bays and balconies, often made of

painted stucco or brick, and retaining well-preserved original balconies, windows, and other details. Therefore, we suggest the text is amended to encourage consideration of the maintenance implications associated with these materials and details so that new development reflects the local vernacular while also being suitable for the exposed marine environment. Once again, we recommend including additional photographs showcasing the material palette and detailing typical of the character area, along with illustrated examples of buildings that utilise these; this will provide greater clarity and clearer context.

5.2 Great Yarmouth Seafront – Landscape design and materials

We welcome the design requirement concerning landscape design and materials; however, we suggest a modification to encompass improvements to the public realm and high-quality materials.

5.5 Great Yarmouth and Gorleston port and industrial areas – General

In common with the other character areas, we welcome the references to historic environment and heritage assets. However, we suggest that this could be improved in places with stronger references to the area's very distinctive historic character. Specifically, it would be beneficial to explicitly name any particularly important heritage assets (designated or non-designated) to provide clearer context.

5.5 Great Yarmouth and Gorleston port and industrial areas – Building design and materials.

We welcome the analysis of earlier industrial buildings within the area characteristic section, and text at Fig. 59. (Page 84) which describes new apartment buildings in the character area, highlighting that they do not take design cues from the attractive older industrial buildings which could form a strong reference point for the scale and articulation of substantial new buildings.

Therefore, it's disappointing that these observations haven't influenced the building design and material requirements for the character area. We recommend that the Council consider whether these attractive older buildings should provide a reference for the code and amend the design requirements accordingly. Once again, it might be beneficial to incorporate additional photographs illustrating locally prevalent materials and building details to provide clarity.

5.7 Terraced streets and squares

We agree with the observation that later development has not consistently reinforced the existing character (refer to page 91 and Fig. 65, caption of the middle right photo). However, we believe that the text would be strengthened by making it explicit that new developments will be expected to actively address this issue by reinforcing and strengthening the existing (historic) character, where appropriate.

Finally, we question the Fig. 65 photo caption middle left (page 93). The caption suggests that finding suitable new uses for historic terraces can be challenging. We disagree with this statement and find it unhelpful; we suggest this text is deleted.

Conclusion

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Respondent: Lead Local Flood Authority

On page 21 CC6: Ensure development is flood safe and flood resilient appears to relate to all sources of flood risk and yet only the Environment Agency's guidance for finished floor levels. Please can you

add in the expected section that the applicant will be expected to also check compliance with the LLFA's guidance too.

On Page 21, CC7: Reduce the risk of surface water flooding on and around the site, the applicant is required to "take account" with the LLFA's advice as stated by NPPF paragraph 169. Therefore, please can the design code state in the required section that the LLFA's Developer Guidance must be applied appropriately to all developments for surface water management.

Informative – In relation to CC8: Reduce urban heat island effect, the use of green SuDS has been shown to contribute to support the management of this. In addition, the combined use of solar panels with green roofs is shown to be beneficial to the performance of solar panels.

In the useful resources section on page 23, please remove the reference to the NCC Highway SuDS Adoption Guide and replace with reference to the LLFA's Developer's Guidance document which can be found at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>.

On page 26 CI3, the LLFA note there is no mention of the use of SuDs to support the creation of a positive and distinctive sense of place for new developments in either the required or expected sections. Please can this opportunity to include SuDs in this context be taken as this would support one of the four pillars of SuDs (amenity).

On page 30 SM2, there is an opportunity to expect the use of SuDS to help separate vulnerable users from trafficked areas such as the use of raingardens.

On page 39, the incorporation of green roofs on bike storage should be encouraged such as in Fig. 24 right photo.

On page 43 PS1, there should be a required section that indicates that existing ordinary watercourses must be retained and incorporated into the proposed design.

On page 45 PS4, there is an opportunity to include SuDS between into the text rather than the single mention of green roofs. Other opportunities include Tree pits, rain gardens, attenuation ponds and wetlands all of which would add biodiversity and amenity.

HRA Screening Report

No comments based on a preliminary high-level review.

SEA Screening Report

No comments based on a preliminary high-level review.

Respondent: M. Castle

I should like to see the Design Code pay especial attention to the need for a Controlled Parking Zone in the Town Centre area of Yarmouth between Kitchener Road/Ormond Road to the north and Nottingham Way in the south as this will be a requisite if regeneration of the North Quay, The Conge and Hall Quay areas is to be successful.

The absence of a Zone B controlled parking zone was a major contributing factor in the abandonment of the previously funded (but not delivered) Hall Quay scheme.

The intensification of developments in the areas mentioned above will require a Zone B to the side of the existing Zone A seafront-controlled parking area which has been so successful for local residents and businesses in the years since 2006.

Without this strategic approach there will be difficulty in getting the support of local Town Centre residents and businesses for significant new development – even though this is critical to the future

prosperity of the town. Also of course the revenues derived from parking permits for residents and businesses are absolutely essential in funding Norfolk County Council parking management in the core CPE area.

The town is blessed with several thousand parking spaces GYBC car parks/NCC on street/ Market Gates Multi-storey/ private sector paid car parks and NCC free time-limited on-street spaces - all of which make proper protection for local residents and businesses somewhat easier than elsewhere in the Brough.

It would be a mistake to try to have an All-Borough parking strategy as permit parking would be far less attractive to residents in Gorleston and Caister for example where major regeneration schemes will not be taking place and where there is generally less pressure on parking.

Respondent: National Grid Property Holdings (Via Agent: First Plan)

We are instructed by our client, National Grid Property Holdings (NGPH), to make the following representations to the Great Yarmouth Borough-Wide Design Code Supplementary Planning Document. NGPH is the landowner and promoter of the Former Gasworks and Gasholder site at Admiralty Road, Great Yarmouth, NR30 3DR, herein referred to as 'the site'.

Gasholders are no longer operational, as gas can be stored in pipework underground. This means that many sites, comprising gasholder stations and former gasworks facilities, are no longer in use. Instead, they provide an opportunity for alternative development.

The Gasworks, dating back to the mid-1880s, is located at the intersection with Admiralty Road and Barrack Road, with the full extent of the landholding encompasses circa 1.2ha in total. The eastern portion extends to circa 0.4ha and features the Grade II Listed Gasholder, No.5, within the northern extent and non-listed Gasholder No. 6 to the south. Permission has been secured for the demolition of the non-listed gasholder (ref: 06/22/0102/DM), and planning and listed building consent applications are pending for the partial refurbishment and demolition of the listed gasholder (refs: 06/23/0522/F and 06/23/0523/LB). The western portion of the site includes an expansive area of open storage with a separate access off South Denes Road. The site is vacant and predominantly laid to hardstanding and bare ground with ephemeral / short perennial vegetation. The surrounding area features residential properties to the north and east with commercial and industrial uses to the south and west. The site is located 400m west of Yarmouth beach and 200m east of the River Yare, close to the Third River Crossing.

An initial Call for Sites was undertaken in Summer 2022 and NGPH has made it clear that they would like to be involved in the development of the new Local Plan and the supplementary SPDs consultation going forward as works continue to ready the Former Gasworks site for alternative development.

NGPH is not a developer and therefore the Draft Design Code SPD is arguably of more relevance to future developers and their development proposals for the site. However, it remains relevant to NGPH as they look to dispose of the site. The gasholder is unique in its scale and appearance, with long views available across Great Yarmouth. Assuming the approval of the pending applications, this will soon be restored in line with its original appearance. Beyond this, the site is vacant and cleared. The gasholder is therefore a significant consideration in the design of future development proposals.

We note that the gasholder site is situated within the '*Great Yarmouth and Gorleston Port and Industrial Areas*', known as character area 5.5. The SPD acknowledges there is mixed development types seen throughout the area and welcomes mixed development of various scale within the area.

As has been made clear already, NGPH welcomes as wide a range of uses as possible, to encourage investment into the site, including supporting the proposed removal of the site from the Safeguarded Employment Land designation. NGPH is therefore generally supportive of the content

of the draft Design Code, which acknowledges that the historic uses, buildings, and structures of this area *'could form a strong reference point for the scale and articulation of substantial new buildings'* (Fig. 59)

Noting the significant investment required to partially refurbish the listed gasholder, flexibility around the scale, type, mass, and form of development on the remainder of the site, and indeed within the gasholder footprint (assuming the tank and bell are permitted to be removed), is wholly supported.

For these reasons, NGPH supports that the Design Code encourages high-density development and, where appropriate, high rise residential dwellings amongst the uses suitable for this part of Great Yarmouth. Buildings of 12-20m are supported, possibly taller in waterfront locations. The application site, whilst not in a waterfront location, has the potential to accommodate taller structures too, noting the scale of the existing gasholder, which sits significantly above the height of surrounding buildings. Indeed, it is clear from other retained gasholder sites that significant development can co-exist alongside retained structures, subject to detailed design considerations, viability and, of course, regard to the designated heritage asset, both in terms of retention of the asset and enhancing its setting.

More generally, the draft document encourages appropriately scaled development, using sites as effectively as possible which respond sensitively to the surrounding area and connect isolated areas together through careful massing and scale design. This is wholly supported by NGPH as the application site, which is strategically located in terms of its proximity to the Third River Crossing and is cleared and available for development, presents an ideal opportunity to initiate development in line with these aspirations in this important Character Area.

I trust that this provides clarity on the landowner's aspirations for the site, their views on the content of the draft Design Code, and their continued interest in engaging as the Local Plan progresses. However, if any further information or clarification is required, please do not hesitate to contact me.

Respondent: Norfolk County Council Childrens Services

Norfolk County Council school design is based closely on design guidelines set out in the DFE Building Bulletin Guidelines, and output specifications. These set out the expectation for spaces and technical elements that dictate design and form. This includes requirements for hard and soft play. Parking requirements are set out by Norfolk County Council Highways parking standards.

School sites should form an integral part of any development area, they provide an important part of infrastructure that can support the local community. It is important school sites are accessible from the housing to which they serve, within legal walking limits and they have links to major estate roads.

School site areas should be sufficient to meet relevant building bulletin design standards. Additionally, there should be allowances for bio-diversity net gain, sustainable urban drainage, and the county council's aim to provide nursery and special education needs provision as part of the school design.

Land for school provision should be as flat and regular shaped as possible and should not be in a position where it can be overlooked by multi-storey buildings nor be overshadowed by large tree canopies. Schools will be designed to deliver a high efficiency and will complement their local surroundings.

Respondent: Norfolk County Council Natural Environment Team

PS1: It is advised that reference is made to the RTP/ RSPB best practice guidance *Cracking The Code*; How design codes can contribute to net-zero and nature's recovery: *Plan The World We Need*

(rspb.org.uk) and Site Level Design Code; Design Code for Net Zero and Nature Recovery: site-code_220317_compressed.pdf (rspb.org.uk)

PS4: It is advised that reference is made to the CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments (ciria.org) and the Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure final edits to make (blog.gov.uk)

Respondent: Norfolk County Council Public Health

Public Health are pleased to see the inclusion of health and wellbeing considered throughout the Great Yarmouth Design Code and that it supports the creation of well-designed developments and healthy environments.

Some specific Public Health comments to consider are stated below:

3.1: To include - Support healthy behaviours and reduce health inequalities.

4.1: The health benefits of addressing climate change could be referenced, for example active travel supporting physical activity.

4.4: To include - Local growing options such as allotments/ orchards to provide healthy food options.

Respondent: Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure, and access to and enjoyment of nature.

While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment but may nonetheless have some effects. We therefore do not wish to provide specific comments especially relating to area design requirements, but advise you to consider the following broader issues:

Addressing climate change and conserving natural resources

Natural England supports the requirement for development to incorporate natural modes of travel, onsite renewable energy, reduced carbon emissions, water efficiency and flood resilience.

It is noted that proposed sustainable drainage system (SuDS) features should demonstrate compliance with the principles and standards set out in the CIRIA SuDS Manual. Natural England is supportive of this requirement and also would refer to the guidance for constructed wetlands: Introduction to Freshwater Wetlands for Improving Water Quality - JP044 (naturalengland.org.uk). This guidance is particularly important in Nutrient Neutrality catchments.

Context and identity

The SPD provides opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

An updated Landscape Character Assessment would be a useful evidence base to assess where there are opportunities to conserve and enhance the built and natural environment and record areas where there has been deterioration since the last assessment.

Public open space, nature, and water

The National Planning Policy Framework paragraph 175 states that local planning authorities should ‘take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’. The Planning Practice Guidance on Green Infrastructure (GI) provides more detail on this and also the recent Green Infrastructure Framework which helps Local Planning Authorities and developers meet GI requirements.

Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. The provision of street trees in the SPD along movement routes is welcomed to enhance and create opportunities for wildlife in urban areas.

A reference to the Norfolk Green Infrastructure Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) might be useful in this section for context. The strategy secures developer contributions from all new residential development across Norfolk based on the evidenced tariff-based approach, to make a substantial contribution to mitigating adverse impacts arising from planned housing growth at Habitats sites. It also commits to deliver enhanced GI with multiple benefits which is accessible locally to all Norfolk residents & tourists.

There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:

- green roof systems and roof gardens.
- green walls to provide insulation or shading and cooling.
- new tree planting or altering the management of land (e.g., management of verges to enhance biodiversity).

You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

Natural England supports the multi-functionality and connectedness of open, green, and blue space within the SPD. This will improve ecosystem functions and garner a range of improved ecosystem services provision which are vital for human health and wellbeing.

Natural England welcomes the requirements to maximise the opportunity of securing at least 10% Biodiversity Net Gain (BNG) on-site (PS4).

Building Design

Obtrusive light can cause visual detriment and species disturbance as well as impacting Dark Skies, a special feature of Protected Landscapes. The Institute of Lighting Professionals has useful guidance on mitigating impact through design (ILP Guidance Notes) and this could be included as a policy link to BD10.

Strategic Environmental Assessment/Habitats Regulations Assessment

An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project.

Natural England agrees with the conclusions of the Strategic Environmental Assessment (SEA) Screening Report, July 2023 that the SPD will not have any significant effects on the environment and therefore a full Strategic Environmental Assessment is not required.

The Habitat Regulations Assessment (HRA) Screening Report, July 2023, has identified no Likely Significant Effect to designated sites alone or in combination as the SPD does not promote or support new development in addition or different to that which is already supported through existing policies. Natural England agrees that no Appropriate Assessment is required.

Respondent: Bourne Leisure (via Agent: Lichfields)

On behalf of our client, Bourne Leisure Limited (“Bourne Leisure”), we are pleased to submit representations to the Draft Borough Wide Design Code Supplementary Planning Document (SPD) prepared by Great Yarmouth Borough Council (GYBC).

By way of background, Bourne Leisure operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within Great Yarmouth, Bourne Leisure operates four Haven holiday parks: Seashore Holiday Park, Caister-on-Sea Holiday Park, Hopton Holiday Village and Wild Duck Holiday Park.

This representation responds to the Draft Borough Wide Design Code Document and focusses on the following sections within the document: Scope and Purpose of the Design Code (Section 1.1); Status of the Design Code (Section 1.2); Borough Wide Design Requirements (Section 4); and Holiday Parks (Section 6.5).

Section 1.1 Scope and Purpose of the Design Code and Section 1.2 Status of the Design Code

Bourne Leisure acknowledges the importance of design guides/ codes informing development, reflecting national policy requirements in the NPPF (2021). Section 1.1 of the document sets out its purpose and states that the SPD is to be used as a ‘tool to assist in meeting the Strategic Objectives of the Adopted Local Plan’. This is in line with the definition of an SPD as set out at Paragraph 8 of the national Planning Practice Guidance.

Section 1.2 notes that ‘subject to potential reforms of the planning system, the Design Code may be incorporated into the new Local Plan or be adopted as a Supplementary Plan’. If the Design Code is brought forward through the Local Plan or a Supplementary Plan, we trust that this would be subject to further consultation.

Section 4: Borough Wide Design Requirements

The scope of Section 4 ‘Borough wide design requirements’ of the document appears to have been largely written in the context of residential development. Whilst some of these borough wide design codes are applicable to Holiday Parks, others promote design principles which are not applicable to the design and layout of holiday parks which by their nature relate differently to their surroundings in terms of streets, movement, parking, sustainability and built form e.g., the details of active heating and cooling for a building compared to a caravan.

As a further example, the figures within Section 4 illustrate the focus on residential and/or large-scale urban development, with no comparable reference to the layout of caravan pitches, internal roads, and parking in holiday parks.

Whilst the focus of the design code on residential development is understandable, greater clarity is required to recognise that not all the requirements will apply to holiday parks. Given a specific section has been included on Holiday Parks, we request that a clause is added in Section 4 or in Section 6.5 to reflect this point or, if necessary, section 6.5 is expanded to refer to the relevant requirements in Section 4.

Section 6.5: Holiday Parks

Bourne Leisure welcomes the acknowledgement in Section 6.5 that 'Holiday Park development forms an important part of the local economy' with specific design considerations relating to boundary treatments and relationship to surrounding context and landscape. However, we note that the second paragraph of this section states that 'The borough-wide requirements of the Design Code apply equally to holiday park development and the following points capture some of the priorities in terms of master planning and integration with context.'

As noted above, the borough wide requirements do not apply equally to holiday park development, and it is therefore necessary to provide greater clarity within Section 6.5 as to what requirements are most applicable.

Currently Section 6.5 highlights that the primary design consideration for holiday parks is integration within the surrounding context and landscape setting – with specific focus on boundary treatments, screening, external lighting and mitigating 'opportunities for recreational disturbance to natural wildlife/ landscape locations. Whilst we agree that these are key considerations the reference to mitigation of recreational disturbance appears to go beyond being a purely design matter.

This will require technical assessment of the impact of development, from which appropriate design or other forms of mitigation measures should flow. We therefore request that the first bullet point under the Landscape Setting heading is amended as below for consistency with policies CS8, CS15 and GSP5:

~~"Mitigate opportunities for~~ Minimise recreational disturbance to natural wildlife/landscape locations.

through the design of enhancements, ~~the movement network/connection to green spaces as well as~~ to suitable alternative natural green spaces for recreation and/ or to the movement network/connection to these spaces."

Figure 77 within Section 6.5 provides examples of boundary treatment types. The variation in these examples demonstrates that appropriate boundary treatments will differ on a case-by-case basis and there is not one singular approach that is advocated. Bourne Leisure endorses this approach to provide appropriate screening for holiday park developments. Whilst the current text notes that 'close board fencing is not appropriate' it should be noted that in some circumstances, e.g., where Holiday Park boundaries abut the gardens of neighbouring properties, this will be the most appropriate boundary treatment.

Respondent: Broads Authority

Summary of response

This is generally a well written and accessible and easy to understand document. The comments tend to relate to typos, grammar as well as lighting.

Comments

2.1 – probably not say Broads National Park as this is a planning document.... Maybe say equivalent status to a national park?

4.1 – grammar – ‘Climate change is the biggest challenge we face, and it is a strategic priority that all development proposals address it through mitigation and adaptation’ – need to address? Does that read better?

Page 18 – at the bottom – full glazing – lots of glazing can cause light pollution issues as well and needs to be mitigated.

Page 44 ‘through us of SuDS’ – should be ‘use’.

Page 57 – expected... might want to indent the bullet points 2, 3, and 4.

BD10 page 59 – should really ask if lighting is needed in the first place. This, as written, goes straight to providing lighting.

Page 60 – talks about deterring birds, but have you thought about a section on biodiversity enhancements? Like our guide: [Broads Authority biodiversity enhancements \(broads-authority.gov.uk\)](https://broads-authority.gov.uk). I know BNG is coming in, but not all development will be required to do BNG so something about biodiversity enhancements in the guide, rather than just doing things to stop birds perching might be prudent.

Within the Town Walls – would welcome reference to making the most of the waterside settings – for example, the North Quay area is on the boundary of the river and Broads so rather than turning its back on the water, maybe make the most of it and embrace it and face it?

Page 110 says ‘and it is preferable for rear gardens to form the while walking and cycling routes’... I don’t think the sentence reads right...

Section 6.3 – how does talking about retail and commercial units in out-of-town locations sit with the NPPF and local plans? Does it need to talk about out-of-town locations? Isn’t the section simply about industrial, commercial, and retail units? Further, as set out previously, in terms of lighting, isn’t the first step to justify the need for lighting in the first place?

Respondent: B. Oldham

I had a look at the spec. I am not a surveyor, environmentalist or have any experience of town planning only my life experience as an inhabitant of, Gorleston, Gt Yarmouth and now Bradwell. In that time, I’ve seen buildings have been torn down that never should have an art deco theatre, a brewery, fine buildings making way for a shopping mall that has had a short shelf life and recently a cobbled historic marketplace redesigned, costing plenty but doesn’t appeal to many according to social media comments.

Brown sites have to be used for building purposes, let’s not see unnecessary green spaces churned up with destruction to residing wildlife(Bradwell will soon link to Belton).

Progress with any development must be mindful, wise and have knowledgeable people on the serving committees with the authority to stop unqualified rich developers taking over. Save our town, our green spaces and develop with education in mind as no amount money spent on redevelopment will enhance a town where inhabitants have no pride. Build communities that foster this and reprimand those with no respect. Unfortunately, our borough council has a bad track record and needs to show its integrity for the community it serves and for whose taxes they are accountable for.

To all involved, do your best!

Respondent: Sports England

Thank you for inviting Sport England to comment on the above consultation.

The latest version of Sport England's [Active Design guidance](#) (AD3) was published in May 2023. The guidance sets out ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The principles are aimed at contributing to the Government's objective for the planning system to promote healthy communities through good design (paragraph 8 of the NPPF). Active Design complements the ten characteristics of well-designed places set out in the National Design Guide (NDG) and is considered part of the framework which underpins both that and the National Model Design Code (NMDC).

Sport England would encourage local authorities to use AD3 to help ensure their own policies and guidance are developed in accordance with the NPPF (with specific regard to paragraph 8, Section 8, and Section 12), the National Design Guide and the National Model Design Code.

The draft SPD includes reference to several of the key principles of active design covered in AD3 and this is welcomed by Sport England. However, some of the key principles have not been included and we would suggest some amendments could be made to include some of these which would make the draft guidance more effective in delivering the NPPF objective of promoting healthy communities through good design.

The Council may consider it beneficial to assess the draft code against the "[Active Design Checklist](#)" that has been prepared alongside the Active Design guidance. Although the checklist has been designed primarily as a way of assessing planning applications, it can also be used to assess whether policies or guidance have included an appropriate level of detail against each of the Active Design principles.

Section 4 of the draft SPD "Borough Wide Design Requirements"

In terms of specific comments against the draft SPD requirements under Section 4, Sport England would like to offer the following comments.

CC1: Ensure walking, cycling and public transport are the natural modes of travel for all users.

SM1: Create a walkable and integrated network of streets and pedestrian/cycle routes.

SM2: Design movement routes to clear and consistent standards which prioritise vulnerable users, children, pedestrians, and cyclists.

Sport England support the inclusion of a hierarchy of travel approach that is described under CC1, SM1 and SM2. Use of the term "active travel" explicitly in the requirements may be considered appropriate and this would align with the terminology used in the NMDC, NDG and AD3. We would suggest the current required and expected lists under CC1, SM1 and SM2 could be expanded further. Under the active travel theme in AD3 there are principles: 1) walkable communities, 2) providing connected active travel routes and 3) mixing uses and co-locating facilities. The draft SPD would benefit from greater consideration of each of these principles. For example, mixing uses and co-location of facilities (principle 4 of AD3) will mean more people are likely to combine trips and use active travel to get to destinations with multiple reasons to visit. The principle of mixing uses is an important factor in encouraging active travel, but this is not referenced at all in the draft SPD. We would suggest consideration should be given to the sub principles that relate to principle 4 in AD3:

- Avoid uniform 'zoning' of large areas to single uses.
- Create mixed use, connected focal points in prominent places within a community.
- Co-locate sport and recreation facilities alongside complementary uses.
- Use the public realm to create informal activity at sports/recreation facilities.

This could either be achieved through an expansion of the currently drafted requirements or a new requirement.

SM3: Create multifunctional streets which contribute to creating vibrant and active communities.

The principle of this requirement is supported as it accords with AD3.

SM4 Ensure the amount and design of cycle parking and storage incentivises cycling on an everyday basis.

Sport England fully support guidance that incentivises cycling. The requirements listed however only relate to residential development. It is important for the draft SPD to also include other uses, including employment and leisure. Requirements for secure cycling storage and other associated cycle infrastructure e.g., showers and lockers should also be included in the requirement lists for non-residential uses (see section 8.2 of AD3). It may be considered appropriate to also include this under draft policy CC1. As currently drafted CC1 only refers to quantity and location of cycle parking and storage.

PS2: Provide a sufficient quantity, type, and quality of public open space and green infrastructure with development.

Sport England fully support the principle of this requirement. This accords with theme 2 of AD3 (Active, high-quality places and spaces). Open space networks can provide a safe and attractive opportunity for active travel between destinations, as well as important spaces to be active. Sport England also fully support the requirement to consider the needs of all users in the design of public spaces as these accords with the overarching theme of AD3 of opportunity for all. The requirement for the spaces to be multi-functional is also fully supported. We would suggest other requirements not currently included in the draft SPD may also be considered appropriate to include (see Principle 5 of AD3), for example:

- Linking open spaces together within and beyond a site
- Integrating a diversity of natural habitats to make environments where people want to be outdoors and active.
- Making space for children's play

PS3: Ensure public access to watercourses.

Sport England fully support the principle of widening up accessibility to green and blue infrastructure. Consideration should also be given to how this will integrate with existing and other proposed active travel routes.

PS5: Include street trees along movement routes and as part of public spaces.

Sport England would welcome specific text that states that trees should be positioned carefully so that proposed and existing active travel routes and infrastructure are not blocked.

General comments

As shown above, active design is concerned with wider design issues, it is not just focussed on active travel. As such Sport England would suggest that the Active Design guidance is included in the Useful Resources section under each appropriate section.

Creating and maintaining activity is the third theme of AD3. Sport England suggest that the guide would also benefit from greater reference to appropriate maintenance. Further guidance is included in AD3 under Principle 9.

Respondent: Broadland Housing Association (via Agent: Bidwells)

On behalf of our clients, Broadland Housing Association (BHA), we are instructed to submit representations to the Borough Council's Great Yarmouth Design Code, Consultation Draft, Supplementary Planning Document (June 2023).

Whilst BHA support the principle of a Design Code, this representation seeks a significant rethink to the structure of the Design Code to ensure that it does not provide overly prescriptive and inflexible policies that have the potential to stifle good, innovative, design, whilst also adversely affecting the viability of development. In addition, amendments are sought to ensure that the Design Code is precise and, crucially, does not duplicate the requirements of other policies and legislation resulting in unclear guidance and unnecessary work for applicants.

Introduction

Overall, we support the objective of the Design Code to “set out clear principles and standards for how development should be designed in the borough, focussing on the priority aspects of design” (paragraph 1.1, GYBC Draft Design Codes).

However, we feel there are a number of Codes¹ which require amendments/ removal to ensure the Design Code has a focussed and positive impact on design in the Borough. The issues are explained in more detail within the paragraphs, but mainly relate to a number of the draft Codes unnecessarily duplicating the requirements of adopted planning policies; Building Regulations and matters covered by technical Statutory Consultees (such as Norfolk County Council Highways and the Lead Local Flood Authority), rather than priority aspects of design. With the exception of a limited number of cases, the Codes fail to provide further guidance on how adopted Development Plan policies will be delivered.

We therefore suggest that, in order to deliver a concise and focused document that provides certainty to users, that the volume of the Design Code is significantly reduced, and the number of criteria² within the remaining Design Codes is revised to allow for flexibility within the design process and to ensure that innovative design that would benefit the Borough is not stifled. The amendments will also ensure that development is not unduly constrained and, crucially, is viable.

These matters are explored in more detail below before a Schedule is provided as Appendix 1 which highlights which Codes should either be amended or reviewed.

Volume of Design Codes

The volume of Design Codes (total of 36 Design Codes) within the document is a key concern; each Code containing a mixture of ‘Required’ / ‘Expected’ / ‘Best Practice’ criterion. In total there are 173 criteria.

BHA agree that applicants should evidence good design within their schemes, but the overall number of criteria is excessive, and arguably does not highlight the ‘priority aspects of design’ within the Borough. It results in a somewhat cumbersome document for the user (119 pages) that covers a range of non-core design issues that duplicates matters covered by other policies of the adopted Development Plan or compulsory statutory guidance; placing an unnecessary burden on applicants and resulting in the document losing its key focus of highlighting the priority objective of the document.

The suggested amendments to the Design Code aims to provide a more focused document that is manageable and provides clarity on the design priorities within the Borough.

Definitions

¹ The Design Code ‘policies’ that this document relates to, for example ‘CC4: minimise potable water use’.

² The criterion that falls under the Design Codes, for example under CC4, the ‘Required’ criterion is to: ‘Design new residential development, and holiday accommodation in buildings to use 110 litres of potable water, per person per day, or less’.

The document stipulates that Design Codes (i.e., those not covered by ‘required’ criterion) are not mandatory, but it also notes, somewhat contradictorily *“if development proposals do not comply with these code requirements, the onus will be on applicants to demonstrate why compliance is not feasible or appropriate”* (paragraph 1.4, GYBC Design Codes).

As the majority of this criterion are not listed as ‘Required’ (153 of 173 criterion) and are not therefore covered by currently adopted national, or local policy, it is hard to understand the planning basis for developers being required to justify why they have not implemented certain criterion within schemes. The purpose of Supplementary Planning Documents is to provide further detailed guidance on the implementation of development plan policies; it is not to introduce new and more onerous requirements on applicants. The draft Codes have the potential to create substantial additional work and cost for developers, which goes beyond the requirements of the adopted Development Plan.

Furthermore, if one of the points of this document is to *‘signpost users to other sources of regulation, guidance, assessment tools and best practice’* (GYBC Design Code, paragraph 1.1), it is unclear why any form of justification or assessment is required.

This definition (which we assume is for ‘Expected’ rather than ‘Best Practice’ criterion) should therefore be amended to make it clear that this is not a requirement for all new development, but examples of good practice that applicants will be encouraged to explore. Accordingly, if the criterion is to be retained, they should state that they represent examples of good practice and that, where practical, feasible, and appropriate, applicants should seek to incorporate within developments.

Duplication - Planning Policy, Statutory Consultees and Building Regulations

The Design Code notes that this document *“is not an exhaustive design manual for every detail and is not a substitute for commissioning suitably qualified and experienced professional designers and consultants to prepare proposals and the supporting technical information required”* (paragraph 1.1, GYBC Draft Design Codes). But in its current manifestation, this is arguably not the case.

As well as extending to 119 pages, the document has a number of Codes that duplicate and, in many cases, contradict the current guidance relevant to ‘suitably qualified and experienced professional designers and consultants’, including statutory consultees and regulatory guidance such as the Lead Local Flood Authority, Norfolk County Council, as well as the requirements of Building Regulations.

Aside from causing confusion on what are the most pertinent design issues within the Borough, and what will be used within the planning balance for the determination of planning applications, the requirements of statutory consultees and Building Regulations are subject to constant change, at a faster rate than planning policy, as new regulations come into force. This would create additional confusion if, very quickly after adoption, the Design Code provides guidance on technical matters that differs from advice being provided by statutory consultees. Furthermore, the Design Code should not inadvertently impose unintended consequences on the viability of future planning applications, for example via the insistence of highway design features which contradict guidance of the statutory authority or impose substantial additional costs if these features are adopted or refused adoption by the authority.

Paragraph 1.5 of GYBC Design Codes seeks to provide further clarity of how the Design Codes should be used, noting that the users should identify which code requirements are applicable to the specific proposal under consideration, through relevant planning policy, relevant borough wide requirements, relevant character areas, and the type of development proposed. However, it is our opinion that Design Codes should not effectively introduce new ‘local’ planning policies or repeat or conflict with existing strategic or local planning policies that are already in place within the Adopted Local Plan, National Planning Policy Framework (NPPF), or other relevant policy. In many cases, the Codes provide less information than is actually provided within the adopted Policy.

The NPPF 2023 highlights this point for the creation of Local Plan documents, noting that Plans should ‘*serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)*’ (paragraph 16f). Whilst noting that the Design Code is not a Plan, the principle of producing documents that are clear, concise and avoid unnecessary duplication is pertinent.

The NPPF (2023) also requires plans to “*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*” (paragraph 16d). The Codes provide, in most cases, very little detail on how the application of the criterion will be benchmarked / assessed, creating a significant amount of uncertainty for the applicant.

Summary & Recommendations

Based on the foregoing, this Representation seeks a significant rethink to the structure of the Design Code to ensure that it does not provide overly prescriptive and inflexible policies that have the potential to stifle good, innovative, design, whilst also adversely affecting the viability of development. Further detail on the proposed revisions is attached as Appendix 1. The amendments are sought to ensure that the Design Code is precise and, crucially, does not duplicate the requirements of other policies and legislation resulting in unnecessary work for applicants.

Broadland Housing, who have a reputation for delivering high quality sustainable design across Norfolk and Suffolk, would welcome the opportunity to discuss these proposed changes with the Council in more detail at the earliest available opportunity.

Appendix 1

CC1: The objectives of the code are not ‘required’, only ‘expected’, therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Furthermore, the Criterion of the Code are unqualified and don’t provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants. Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

CC1 Recommendation: Remove

If the Code is retained, the criteria should be amended to provide appropriate benchmarks against which they can be assessed.

As a general point that applies to the majority of Codes, if criterion is to be included within the Codes, it should be made clear that they are examples of good practice and that, where practical, feasible, and appropriate, applicants should seek to incorporate within developments.

CC2: The objectives of the code are not ‘required’, only ‘expected’, and ‘best practice’, therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

In addition, to the comments above, all new development would be covered by Policy CS12 of the Adopted Development Plan which will need to be addressed by any applicant. Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Furthermore, the Criterion of the Code are unqualified, potentially contradictory to building regulations, and don’t provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CC2 Recommendation: Remove

If the Design Code is retained, the criteria should be amended to provide appropriate benchmarks against which they can be assessed.

CC3: The requirements of the code are not 'required', only 'expected', and 'best practice', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Rather than expecting, for example, air source or ground source heat pumps to be provided within development, the Design Guide should be focussing on key design elements that should be considered as part of their design, such as the location, potential nuisance, visual impact, and level of noise of these systems.

CC3 Recommendation: Remove

If the Design Code is retained, it should be amended to reflect key design elements, rather than introducing new design requirements that go beyond the requirements of adopted Development Plan policy.

CC4: The criterion of the Code is not considered to relate to priority aspects of design and is covered by Policy E7 of the Adopted Development Plan. To avoid unnecessary duplication within the Design Guide, this code should be removed.

In addition, the Design Code does not provide any advice on how the restriction of 110 litres of potable water per person should be incorporated into schemes.

The remaining criterion of the Code are not considered necessary as they are 'expected' and best practice'; criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

CC4 Recommendation: Remove

If the Code is retained, further information is required on how proposals will be required to achieve the 110 litres of potable water criteria in practice.

CC5: The requirements of the code are not 'required', only 'expected', and 'best practice', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

In any event, the criterion is unqualified with no benchmarks and has no regard to the practicality or feasibility of development retaining existing structures. Flexibility therefore needs to be incorporated within the Design Code.

CC5 Recommendation: Remove.

If the Design Code is retained, flexibility is required to ensure it reflects what is practical and feasible.

CC6: The 'Required' criterion of the Code is not considered to relate to priority aspects of design and is covered by Policy CS13 of the Adopted Development Plan, and, accordingly, will need to be addressed as part of any application, having regard to comments from the LLFA and Environment Agency.

The remaining criterion of the Code are not considered necessary as they are 'expected' and best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., they

are not 'Required' criterion), and would also be required to have regard to comments from the LLFA, Environment Agency and comply with Building Regulations.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

CC6 Recommendation: Remove.

CC7: Rather than Policy CS12, we feel this Design Code better relates to Policy CS13 of the adopted Development Plan. Nonetheless, the 'Required' criterion of the Code is not considered to relate to priority aspects of design and any proposals will be required to have regard to comments from the LLFA in relation to the Suds hierarchy.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would also be required to have regard to comments from the LLFA.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

In any event, the criterion of the 'expected' Code in relation to permeable and absorbent surfaces on site are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CC7 Recommendation: Remove.

If the Design Code is retained, the criteria should be amended to provide appropriate benchmarks against which they can be assessed.

CC8: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Furthermore, it is unclear how the requirements of the Code will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CC8 Recommendation: Remove

If Design Code is retained, further information is required on how proposals will be required to achieve this in practice.

CC9: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Furthermore, it is unclear how the requirements of the Code will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CC9 Recommendation: Remove

If Design Code is retained, further information is required on how proposals will be required to achieve this in practice.

CI1: We support, in principle the specifications of the 'required' aspects of this policy. The requirement clearly relates to a policy and provides greater clarity of what is required.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

CI1 Recommendation: Remove 'expected' criteria of the Design Code.

CI2: To ensure a consistent approach with the other Design Codes contained within this document, the 'expected' criteria, aside from the criteria relating to signage should be amended to 'required' criterion, as this accords with adopted Development Plan policy.

Nonetheless, to prevent the duplication of information contained within Policy CS10 and E5 of the Adopted Development Plan, this Design Code should be removed. Furthermore, the measurement of significance in relation to heritage assets is not qualified, nor the metrics by which it can be enhanced.

CI2 Recommendation: Remove

CI3: The 'Required' criterion of the Code is covered by Policy CS9 and **A2** of the Adopted Development Plan and should be removed to prevent duplication.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CI3 Recommendation: Remove

If Design code is retained, further information is required on how proposals will be required to achieve this in practice.

CI4: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Furthermore, the criterion under this Design Code largely repeats the criterion under CI1, and it therefore is difficult to understand what additional benefit this would provide to design.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

CI4 Recommendation: Remove

SM1: The 'Required' criterion of the Code is covered by Policy CS9 and GSP7 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, to prevent replication, this is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM1 Recommendation: Remove

If Design code is retained, further information is required on how proposals will be required to achieve this in practice.

SM2: The 'Required' criterion of the Code is covered by Policy CS9 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, To prevent repetition, this is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' and 'best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM2 Recommendation: Remove

If Design code is retained, further information is required on how proposals will be required to achieve this in practice.

SM3: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

In any event, the criterion should not request development to follow homezone/Woonerf street principles as it could stifle new, innovative design or impose unintended impediments on the ability to adopt highways infrastructure. Flexibility therefore needs to be incorporated within the Design Code if it is to be retained.

SM3 Recommendation: Remove

If the Design Code is retained, it will require flexibility to ensure it does not stifle innovation within design.

SM4: The 'Required' criterion of the Code is covered by Policy CS9 and I1 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, to prevent repetition, it is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would cause confusion with the adopted Norfolk County Highways Parking Standards documentation.

It is also unclear how the proposed expected and best practice criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM4 Recommendation: Remove

If the Design code is retained, amendments would be required to ensure the criterion does not conflict with Norfolk County Highways technical documents, and further information would be required on how proposals will be required to achieve the criterion in practice.

SM5: The 'Required' criterion of the Code is covered by Policy CS9 and I1 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, to prevent repetition, it is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' and 'best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would cause confusion with the adopted Norfolk County Highways Parking Standards documentation and have regard to comments from the Lead Local Flood Authority.

It is also unclear how the proposed expected and best practice criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM5 Recommendation: Remove

If the Design code is retained, amendments would be required to ensure the criterion does not conflict with Norfolk County Highways technical documents, and further information would be required on how proposals will be required to achieve the criterion in practice.

SM6: The 'Required' criterion of the Code is covered by Policy CS9 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, to prevent repetition, it is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' and 'best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would also be required to have regard to comments from Norfolk County Highways.

It is also unclear how the proposed expected and best practice criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM6 Recommendation: Remove

If the Design code is retained, further information would be required on how proposals will be required to achieve the criterion in practice.

PS1: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Furthermore, the criterion under this Design Code largely repeats the criterion under CI1, or what would be covered by Biodiversity Net Gain policies. On this basis, it is difficult to understand what additional benefit this Code would provide.

PS1 Recommendation: Remove

PS2: The 'Required' criterion of the Code is covered by Policy GSP6 and H4 of the Adopted Development Plan and will need to be assessed against the Open Space SPD. The fact this policy replicates another SPD document highlights that this Code is not necessary. Accordingly, to prevent replication, this Code should be removed from the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' and 'best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would also be required to have regard to the Open Space SPD, and comments from the Lead Local Flood Authority.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

It is also unclear how the proposed expected and best practice criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

PS2 Recommendation: Remove

PS3: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy. All new development would be required to have regard to comments from the Lead Local Flood Authority, including in respect to public safety.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

It is also unclear how the proposed Expected and Best Practice Criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

PS3 Recommendation: Remove

If the Design code is retained, further information would be required on how proposals will be required to achieve the criterion in practice.

PS4: The 'Required' aspects of the Code would be covered by the Biodiversity Net Gain processes, and accordingly to prevent replication, this Code should be removed from the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion). All new development will also be required to accord with Biodiversity Net Gain documentation, the Open Spaces SPD, and have regard to comments from the Lead Local Flood Authority.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

It is also unclear how the proposed Expected and Best Practice Criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

PS4 Recommendation: Remove

PS5: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

It is also unclear how the proposed Expected Criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

The Criterion is also dependent on the adoption requirements of the Norfolk County Council Highways, which will have a significant influence on the ability to satisfy the Criterion and are outside the control of the Council.

PS5 Recommendation: Remove

BF1: The 'required' aspects of the code are largely covered by Policy CS1, CS9 and A2 of the adopted Local Plan and should therefore be removed to prevent replication within Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion). Furthermore, all criterion of this design code largely repeats the criterion under CI1, therefore it's difficult to understand what additional benefit this would provide to design.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

BF1 Recommendation: Remove

If Design code is retained, further information is required on how proposals will be required to achieve this in practice.

BF2: As part of good practice, the principles of Design Code BF2 should be achieved. Nonetheless, the requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy and should therefore be removed.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants. It would be helpful to understand how you would like to see the Design Guide being implemented.

BF2 Recommendation: Remove

If Design Code is retained, further information is required on how proposals will be required to achieve this in practice.

BF3: To ensure a consistent approach with the other Design Codes contained within this document, the 'expected' criteria, relating to indicative minimum housing densities should be amended to 'required' criterion, as this accords with adopted Development Plan policy. Nonetheless, to prevent the duplication of information contained within Policy H3 of the Adopted Development Plan, all existing and proposed 'required' criterion should be removed.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), or are noted within the supporting text of Policy H3 of the adopted Development Plan. For example, paragraph 6.10 notes that areas of on-site open space should be excluded from density calculations.

Furthermore, within the 'expected' criterion, it is not clear what the policy justification, or benchmark criterion should be for the various density of development measurements.

BF3 Recommendation: Remove

If Design code is retained, further information is required on why and how proposals will be required to achieve the various density of development measurements.

BF4: The requirements of the Code are not 'required', only 'expected', and 'best practice' therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy. It is also unclear how this Design Code can be linked to Policy A1 of the adopted Development Plan.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

BF4 Recommendation: Remove

If Design code is retained, justification of required to understand how this Code can be linked to Policy A1 of the adopted Development Plan.

BD1: Whilst we accept that the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; the entirety of this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design. We therefore recommend that 'expected' criteria is instead labelled 'good practice' and with the definition amended to reflect these comments.

BD1 Recommendation: Amend the definition of 'expected' criterion to 'good practice'.

BD2: Whilst we accept that the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; the entirety of this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design. We therefore recommend that 'expected' criteria is instead labelled 'good practice' and with the definition amended to reflect these comments.

BD2 Recommendation: Amend the definition of 'expected' criterion to 'good practice'.

BD3: Whilst we accept that the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; the majority of this code is covered by Building Regulations and should therefore be removed to prevent confusion between and duplication of information.

BD3 Recommendations: Remove criterion that falls within Building Regulations.

Amend the definition of 'expected' criterion to 'good practice'.

BD4: Whilst we accept that the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

Furthermore, the criterion is unqualified in respect to any benchmark metric.

BD4 Recommendations: Amend the definition of 'expected' criterion to 'good practice'.

BD5: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

This criterion raises particular concerns in respect to unintended consequences arising from its highly specific nature, including the potential to undermine the ability to meet other criterion including in respect to minimum development densities and also the potential imposition of specific constraints, particularly with respect to existing brownfield or urban sites in town centre locations whereby these overly generous back-to-back distances may not be achievable or may adversely affect development viability by limiting the built form envelope.

We also recommend the wording of the criterion is amended with additional flexibility, to reflect that it is not always practical and feasible to provide this criterion benchmark.

BD5 Recommendations: Amend the definition of 'expected' criterion to 'good practice' and insert flexibility into the wording of the criterion to ensure it reflects what is practical and feasible to achieve in practice.

Have regard to the aspirations of other Codes and policies, particularly those relating to the need to secure the efficient use of land in urban areas.

BD6: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

BD6 Recommendations: Amend the definition of 'expected' criterion to 'good practice'

BD7: Whilst we accept the provisions of the 'required' criteria are good practice that applicants should be encouraged to follow in accordance with Policy A1 of the Adopted Development Plan; aside from meeting the requirements of the local waste service, there is no benchmark against which the development should be assessed.

Furthermore, we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and

applicants should therefore not be required to justify why this criterion has not been adhered to within design.

BD7 Recommendations: Amend the criteria to provide appropriate benchmarks against which they can be assessed.

Amend the definition of 'expected' criterion to 'good practice'.

BD8: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

BD8 Recommendations: Amend the definition of 'expected' criterion to 'good practice'.

BD9: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

Furthermore, to insure there is clarity surrounding criterion relating to boundary treatments, there should be a benchmark to which development should be assessed.

BD9 Recommendations: Amend the criteria to provide appropriate benchmarks against which they can be assessed.

Amend the definition of 'expected' criterion to 'good practice'.

BD10: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

Furthermore, to insure there is clarity surrounding the criterion there should be a benchmark to which development should be assessed and ensure the council is clear how competing interests, both to avoid excessive light pollution and to ensure vulnerable user groups feel safe at night should be implemented.

BD10 Recommendations: Amend the criteria to provide appropriate benchmarks against which they can be assessed.

Amend the definition of 'expected' criterion to 'good practice'.

BD11: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

BD11 Recommendations: Amend the definition of 'expected' criterion to 'good practice'.

Respondent: A. Harris

So pleased that there is to be a clear set of principles and standards that will apply to all new development's borough wide. There has been too much undertaken on a piece meal or individual case by case approach in the past. This will improve the design quality of new developments with particular attention to shop fronts, North Quay, and Town Hall Quay development plans. This additional guidance will add important planning details to the existing Local Plan and ensure Best practice. Developments must be timely and not unduly delayed through multiple unnecessary appeals etc.

Respondent: Persimmon Homes

Persimmon Homes Anglia have given the GYBC Draft Design Codes detailed consideration and have provided a response to specific Codes. We understand that a distinction has been made under what is 'required' (red), 'expected' (amber), and 'best practice' (green). Our main concern is that the Design Codes may be treated as prescriptive and inflexible. We would hope that the planning officers give due consideration to site circumstances, applying flexibility where appropriate. It is also important to have confidence that what is defined as 'expected' does not morph into what is 'required' under the Code. We seek assurance that GYBC will allow flexibility and exercise a certain amount of judgement over the site, wherein the applicant can demonstrate that the site requires departures, this can be facilitated where justification is provided.

Overall, our main concern is the achievability of meeting the aspirations of the Design Code in context of the character, geography, and topography of the Borough. An example of this is how the minimum density requirements can be achieved taking into account the aspirations/requirements of street typologies road/street widths, as well as privacy requirements and minimum back-to-back distances. We believe that the Council needs to clarify their priorities in terms of efficient land use and density. We see that GYBC prioritises effective layouts and densities which is seen in the GYBC Local Plan under policies CS3, UCS9, CS12, and H3. The NPPF prioritises sustainable development. Specifically, Paragraph 124 sets out the approach for achieving appropriate densities of development. Decisions should support development that makes efficient use of land, taking into account: the identified need for different types of housing and other forms of development; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting; and the importance of securing well-designed, attractive, and healthy places. Paragraph 125 recognises that where there is an existing shortage of land for meeting an identified housing need, it is important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. We acknowledge that good design is at the heart of sustainable development. However, the use of prescriptive measures within a layout can be detrimental to the effective use of space and makes it difficult to achieve the minimum densities required.

We are also concerned that the aspirations of GYBC may not meet the requirements of the NCC Highway Authority and we seek certainty that the Highway Authority will adhere to any adopted guidance such as the Design Codes. As we require technical approval from NCC Highways, it is imperative to us that they have bought in to these Design Codes. We see huge differences in what is approved by the LPA and NCC Highways across all of our sites, and this can cause major delays to the delivery of our schemes.

In light of the above, we would like to attend the committee meeting for the hearing to adopt the Design Codes within the Borough, so that we can raise our concerns.

Please see below in tabular format, our response to the Draft Design Codes.

CC1: With regards to parking and its quantity/location, the Council should demonstrate how they will achieve cooperation from the Highway Authority. This is essential to enable good quality

developments that meet the needs of all stakeholders and to avoid uncertainty and delay in the delivery of development proposals.

CI3: Please provide clarity on the definition of 'character areas', what they entail, and at what stage of development this will be given weight at? Would this be expected to be set out at outline stage or would be captured at reserved matters stage only? If required in phase within a large-scale development, this can result in disjointed clusters and jarring incompatible urban design features. See comments on 6.1 also below.

SM2: The examples sections of the new street layouts (primary, secondary, local streets, and tertiary streets) provide specific carriageway, footway, and cycleway widths. Please advise on the origin of these examples and how they relate to development within the Borough. Referencing to generic requirements that bear no resemblance to established development patterns, run contrary to the aspirations set out in 6.1 of the Design Code documents and would present and prohibit cohesion with host communities in most cases. What degree of flexibility will be applied to take account of site circumstances? The examples provided show road widths appear unrelated to existing settlements and could give rise to inefficient developments that do not relate their local context. We believe that this will have major impacts on viability of developments.

We also believe that there can be conflicts between the Council's objectives and those of the Highway Authority, and this conflict can be seen in terms of parking, circulation, road/street requirements, and servicing and safety.

Additionally, LTN 1/20 is only to be applied to main distributors' roads, and there is conflict between LTN 1/20 and the Manual for Streets 1 & 2. MFS dictates that all roads must adhere to a strict user hierarchy that prioritises pedestrians and cyclists. It would be beneficial to draw this out amongst all of the Street, Movements and Parking Codes, to make it clear what policies/guidance take precedence.

SM3: None of the examples provided to accompany this draft Code include any local referencing. It is unclear how this development would assimilate into or indeed respond to the established built form present in the Borough. Whilst the concepts set out in SM3 are admirable and are accepted as good placemaking, there needs to be an injection of realism on how these features would be delivered.

With the integration of seating/informal play and other functional features into the streets, it would be helpful to get certainty from the Highway Authority that there will not be objections raised in terms of the inclusion of such features and the application of NCC parking standards.

SM4: The requirement of this Code is extremely prescriptive and does not allow for variation of house types or allow for flexibility due to space/density conflicts. The Code needs to clearly define whether it relates to urban/flatted developments and its differentiation from suburban developments.

We also suggest the following amendments to this Code:

Under 'Expected'

- *For dwellings, provide resident cycle parking as per the NCC Minimum Parking Standards.*
- *For HMOs, provide 1 resident cycle space per bed space, and 1 visitor space per dwelling (which can be uncovered and outside of a secure enclosure, e.g., a Sheffield stand).*
- *For retirement housing, provide 1 secure resident cycle space, and one visitor cycle space, per two bed spaces. Many older people use cycles, and in particular e-bikes, for exercise and leisure.*

Under 'Best Practice':

- *For all residential cycle storage, provide one electric outlet per two cycle spaces to facilitate e-bike charging.*
- *Provide adequate secure cycle storage to accommodate at least one cargo bike per dwelling.*
- *Cycle storage must be additional to garages counted as an allocated parking space. Garages can be counted as allocated parking spaces for cycle storage where adequate on plot parking is provided.*
- *Cycle storage can be within curtilage of dwelling but must be secure and covered e.g., cycle locker; dedicated store/shed; dedicated space within hallway/ secure porch; dedicated space within expanded garage.*
- *Locate cycle storage closer to entrance doors, than car parking/ storage.*
- *Ensure cycle storage is secure and naturally overlooked to deter theft.*

SM5: Some of the points expected under this policy conflict with each other: “Include a mix of parking solutions (on-plot, on-street, shared parking areas/courts) to avoid a car-dominated environment.”

Directly conflicts with:

“Deter unplanned on-street parking through the design and layout of streets, and through inclusion and enforcement of parking restrictions.”

We have serious concerns relating to reliance on-street parking, anywhere other than within the town centre. It raises uncertainty over ownership regarding parking and, unfortunately, will eventually lead to unplanned on-street parking as well. The provision of on-street parking also directly conflicts with the NCC parking standards. Will GYBC prioritise the requirements of the Design Code over NCC parking standards?

PS2: We seek comfort in that if site circumstances can justify a departure from the Open Space SPD, some flexibility will be allowed.

PS5: The example trees listed under this Code are salt tolerant species but high-water demand trees – if they were placed on a clay-soil based site, the roots of the tree could cause damage to building foundations and roads. Therefore, we do not believe it is sensible to force this upon developers and should be left to ecologists to deem what is appropriate and not on a site-by-site bases. We also believe the term “close to the sea” is ambiguous and believe more context should be given here.

PS3: We would seek flexibility on this, as access is dependent on ROSPA requirements, particularly where play spaces are being created.

BF1: We would expect that the Area Specific Design Codes were applied as a condition under an outline permission, or there is flexibility that is proportionate to the scale and the stage of the development.

BF2: *“In lower density locations, the scale of street trees should be at least as tall as buildings when mature”*. There should be flexibility that responds to the site circumstances in this case.

Otherwise, we would seek assurances that there was a framework available that detailed the appropriate species for trees in these types of locations.

In addition, the requirement illustrated in fig 3.2 that shows the recommended ratios of building heights to widths, should be applied on a case-by-case basis with the local context in mind. This Code creates potential conflict with the density’s requirements enshrined in the Local Plan– and relates back to our response regarding Design Codes SM2, SM3, SM4, and SM5.

We believe that to lift examples from the National Model Design Code (NMDC) and relate without reference to the Great Yarmouth Borough does not represent adequate justification. There is no explanation of what the active frontage percentage is and how it related to the enclosure ratio.

The NMDC function and status is to provide a common overarching framework for design throughout the country and this then trickles into local design guides. To lift examples from it without providing local context is ineffective.

Further rational is required that justifies this Code in context of established development in Great Yarmouth Borough and Norfolk, if appropriate.

As it currently stands, the imposition of apparently unjustified requirements such as these could have a significant impact on viability based on unachievable densities conflicting with prescriptive road/street widths.

BF3: Relating back to BF2, there is conflict that arises from achieving minimum densities while also achieving minimum back-to-back distances and road/street widths on the development. Clarity needs to be provided on what is the main priority within new developments in the Borough.

We also query the relevance of providing the following density measurements in planning applications:

- number of habitable rooms per hectare
- number of bedrooms per hectare
- number of bed spaces per hectare

As the council provides a density requirement through dwellings per hectare measurements.

BD3: We believe that meeting the M4(2) requirements should reflect the requirements of the adopted Local Plan and Building Regulations. These policies show that flexibility is permitted in certain situations, such as flats that are above ground floor level.

BD5: We note the aspiration in what is trying to be achieved here, however, we seek to ensure flexibility surrounding minimum separation distances that respond to the site circumstance.

There is no evidence provided to justify the minimum distances stipulated. There are a variety of accepted privacy thresholds applied both locally and across the Region. The stated stipulations do not account for individual site circumstances or other measures that could be employed to secure adequate levels of privacy.

We consider that 20m back-to-back distances between new builds is more realistic and acceptable. Flexibility on this and other measures, will maximise opportunities for successful, efficient layouts and assist in the overall goal of achieving minimum densities.

BD6: This policy conflicts with density requirements. It is unrealistic to be setting minimum requirements for private amenity space as it is not reflective of modern densities in the Borough and wider county. We suggest that the requirement for balconies sizing can be offset by access to good quality public open space. We consider the stated minimum amenity space requirements to be unduly prescriptive and could give rise to serious conflicts with the NPPF Section 11 “Making Effective Use of Land” and the Council’s own minimum density requirements.

For this Design Code, we would anticipate that GYBC exercises sound judgement and allows for flexibility in the application of the part of the Code. Not all balconies for flats mesh with the context/character areas of the surrounding as well and this can be difficult to demonstrate within the DAS and planning statements. In addition, we can advise that registered providers resist balconies due to health and safety and management reasons.

BD7: We believe that what is 'expected' under this Code should be applicable only to flats as larger new build housing developments will have separate areas for refuse storage separate from the dwellings themselves. Design matters should be judged on a case-by-case basis and reflect the function and form of the structures and their prominence in the particular street scene.

BD8: Restrictions on the locations of utility and meter boxes in unobtrusive locations needs to be applied to reflect design restrictions on certain dwelling types. For example, on terraced houses – these boxes must be put on primary elevations.

BD9: We request flexibility under this Code as existing hedge lines should be taken into account.

BD10: We believe some elements under this Design Code are contradictory, as it is difficult to protect dark skies while also potentially providing excessive street lighting.

6.1: 'Relationship to landscape'

The 1st paragraph of the section does not make sense and includes typographical errors. We would question whether it is appropriate or desirable in urban design terms to promote rear boundaries as an appropriate mechanism to face onto the footpaths and cycleways from a visual interest and natural surveillance perspective.

'Integration with 'host' community'

There is a focus on seamless integration with existing communities in terms of networks of streets and routes to local destinations. This is acknowledged and attention is drawn to the requirements of SM2 and how that could run contrary to this aspiration in terms of form and character.

Pattern of development'

Again, reference is made to drawing on the built character of existing development in this Section. It runs contrary to a number of the requirements of the Code in relation to the form, layout and typologies set out earlier in the document and need to reconcile with settlement specific circumstances and aspirations for the built form in that area, if truly successful integration is to be achieved.

Reference is made in the draft Code to character areas at street or cluster level. This is not justified in the document in any way other than a comment that it functions as an instrument to avoid generic layout and hose types. Will the Council be providing a detailed analysis of what articulated any further and provides no signposting on how it is envisaged that it could be achieved in a manner that does not give rise to a patchwork of styles and design, particularly if these requirements are to be imposed on such a micro-scale. The Code needs to provide better.

Respondent: Anglian Water

4.1 Addressing climate change and conserving resources.

The Anglian Water region is identified as seriously water stressed, we would support reference to also maximising water efficiency in new developments and regeneration/redevelopment of existing urban areas.

RECOMMENDATION: We would welcome an additional bullet point those states "Maximising water efficiency in new developments through water efficient fixtures and integrated water reuse/recycling measures"

CC4: Minimise potable water use.

Anglian Water supports the inclusion of this code.

We recommend that the code should also reference that the Government's Environmental Improvement Plan which sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water would encourage this standard to be referenced as a minimum standard in the design code "Required" section using a fittings-based approach.

We agree with the "Expected" and "Best Practice" sections and would advocate that the emerging local plan incorporates these as policy requirements.

CC5: Reduce embodied carbon emissions resulting from construction.

Anglian Water supports the inclusion of this code. Our long-term ambition to be a net zero business by 2030 in terms of our operational carbon, also includes a target to reduce our capital/embodied carbon by 70% against a 2010 baseline. Our recently published [Business Plan](#) for AMP8 states that in achieving our capital carbon target by 2030, a 20% reduction in the carbon from concrete will be achieved.

CC7: Reduce the risk of surface water flooding on and around the site.

Anglian Water welcome the inclusion of this code within the SPD. We encourage developers to prioritise the use of SuDS in new developments, and Anglian Water will consider adopting SuDS where they meet our specifications, which can be found on our website.

It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024. However, we welcome this design code to ensure SuDS are incorporated in new developments, until the Schedule is formally implemented, and the necessary measures are in place.

Under the "Expected" section of the code, we would recommend that the multi-functional and integrated aspects of SuDS should also include reference to rainwater/stormwater harvesting and reuse in new developments - helping to reduce the per capita consumption of potable water by utilising rainwater for flushing toilets and irrigation for example. This helps new developments achieve more ambitious water efficiency standards in a region identified as seriously water stressed.

CI1: Design with regard to local context, including the surrounding built environment, topography, landscape, and drainage.

Anglian Water supports the reference to drainage in the code, but notes that further reference is limited in the "Required" and "Expected" areas, with the exception of green and blue spaces. The topography/landform and soils on a site are key to informing green and blue infrastructure (GBI) and we would advocate that GBI is designed in from the start to ensure that SuDS are strategically located to optimise surface water management and integrated water management opportunities and should be a "Required" element of the code.

PS1: Integrate existing natural features, including water and trees, in site layouts.

Anglian Water is supportive of a design-led approach that is framed and led by green and blue infrastructure opportunities and focusses on the existing environmental/natural assets present on the site, which helps to assimilate biodiversity net gains and positive benefits for surface water management.

PS4: Improve biodiversity on and around the development site.

Anglian Water would welcome a reference in this design code to the emerging Local Nature Recovery Strategy for Norfolk, to assist developers with designs that improve habitat connectivity and habitat creation.

PS5: Include street trees along movement routes and as part of public spaces.

Anglian Water agrees that the location of street trees can helpfully align with the provision of SuDS along highways and streets. Street trees provide multi-functional benefits, particularly in urban areas, however, they should be designed to take account of minimising impacts on underground utilities such as water mains and sewers - particularly where street trees are planted in existing developments as part of wider regeneration objectives.

For trees to thrive they need space for root development in the underlying soil, which must be of sufficient capacity to accommodate the rooting habits of the particular species, without impacting on the functioning of our underground assets. In new developments we advise that a sewer or lateral drain should not be located closer to trees/bushes/shrubs than the canopy width at mature height, except where special protection measures are provided - such as use of appropriate barriers to resist root ingress to the sewer system. A tree should not be planted directly over sewers or where excavation onto the sewer would require removal of the tree. To minimise the risk of root damage, tree planting should provide good growing conditions. Guidance can be found in 'Trees in Hard Landscapes: A Guide for Delivery'.

Respondent: R. Clarke

I have read through this document with interest and it's very detailed but is it practicable to use examples from around the country as to where GY wants to be but what has been done to ensure that these examples have made that environment better for those communities?

Respondent: East Suffolk Council

Thank you for consulting ESC on the draft design Code. ESC has no comment to make, although we would like to commend the high quality of the work and the clarity with which it is presented.

Respondent: Hemsby Parish Council

It was agreed that representation be sent to GYBC that the Parish Council was extremely disappointed having spent almost three years to get their own Neighbourhood Plan & Design Codes to adoption stage in June 2023 and to pass the referendum, only to find that a significant number of them are now to be undermined by this GYBC's version which seeks to dilute the vision of Hemsby's residents that was formulated using their responses and desires for all future planning in Hemsby.

The main differences with the Hemsby NHP and Design Code are as follows:

CC7 suds - fencing of them, they wish to see fences of over knee height to deter children.

BD1 housing/garage alignment to the front of properties not the rear as suggested in the local plan.

BF3 density - houses per hectare, they wish this to be in line with the Hemsby NHP design codes not the increased amount shown for Hemsby of 30 minimum per hectare.

c14 design- they are not aligned to the Hemsby NHP in the exterior materials i.e., windows, roofing, or cladding materials.

bd9 boundary treatments seems to state 1m or below boundaries & on page 59 it states below 1.2m

ps4 improve bio-diversity - avoid installation of living walls, but the Hemsby NHP encourages these.

Respondent: Active Norfolk

I wanted to confirm that I'd reviewed the Design Code and really pleased to see reference to Active Design and there's a clear acknowledgement of good design positively impacting on lifestyles. As I suspected, nothing additional to add/comment.

Respondent: K. Newnham

I have read your hard copy of the supplementary planning document June 2023 and would like to make comment on the content.

Firstly, may I say what an excellent and helpful document you have collated for the layman, parish councils and developers. Is it possible to obtain a copy of your other report 'Habitat Regulations Assessment (HRA) Screening Report and a Strategic Environmental Assessment (SEA) Screening Report for the SPD'? As a Norfolk Wildlife Trust member for many years, I would like to know what regulations and assessment aid our wildlife flora and fauna.

I note on page 4 of your Design Code draft 1.2 that you intend to adopt the Supplementary Planning Document supporting the adopted local plan. Whilst mostly this is a 'good thing' I object to paragraphs numbers 2 and 3 where the design code will have precedence over neighbourhood plans. At present the neighbourhood plan has priority should there be a conflict, this should remain in place. These plans have been carefully put together by villages to try and protect the attractive informal villages from being 'vandalised' by developers. If the design code removes this neighbourhood plan precedence, then you will be reversing the formal adoption you gave to the neighbourhoods concerned. Stop moving the 'goal posts' to suit yourselves! What are the potential reforms of the planning system? Is it the Government's reduction in protection of pollution to our waterways which will release land to developers currently not able to be built on for pollution reasons? Developers obviously have friends in high places – I hope the wildlife trusts, National Trust, RSPB, etc. fight this change, this area is particularly affected – nature already has to deal with mankind's chemicals, plastics, domestic pollution. Using natural products, i.e., lemon, vinegar etc. and the excellent Ecover range would help reduce pollution considerably, and yes, I use Ecover, lemon, vinegar, etc. I do not do 'chemicals' anywhere. Do you know when these 'reforms' of the planning system will occur?

With regard to the maps on pages 11, 12, and 13, maps from 1797, 1888 and 1949, it would be useful to actually be able to see them properly. Even with a magnifying glass it is impossible – surely with today's technology these maps could have been enhanced.

Page 14's map is legible.

Page 22's pictures of successful SuDS is surely the way forward for residential developments to go. Your intent for more trees and hedges instead of close boarded fences for boundary treatments is appreciated and I see that you are now encouraging more natural friendly requirements from developers.

With regard to building styles, a number of your examples are awful. It appears our developers should look to the Netherlands (page 38 middle left) and just maintain a more traditional style of house building instead of these carbuncles – Eddington, page 38 Great Kneighton, page 48 – Goldsmith Street, page 56 Silchester Estate etc. They look dreadful as new; can you imagine what they will look like in 30 years' time? As for flat roof homes, have they not learnt lessons from past mistakes?

I will generalise now on cycle/dustbin stores and carparking. It is a mistake to reduce parking for vehicles because you will create a 'park anywhere' situation. I saw this first hand on visiting family at Christmas. New homes, narrow roads (emergency access not possible if cars parked on the roads) strips of land supposed to be gardens, not able to take a car, so residents parked partly on the garden strip and the pavement and on a bit of the road. Households have more than one car these

days so they park outside of the new housing estate on the local roads, so residents of those homes cannot park. However well-meant attempting to change car habits to cycles and buses will take time, and meanwhile you will have chaos and dangerous parking. Perhaps you need one allocated parking space outside the house (not all residents are healthy and mobile) and several smaller areas for additional parking (unallocated) to cover visitors and other family members. Cars of three/four/five vehicles per household appears to be quite normal now. With regard to cycle/bin storage (page 39), figure 24 showing the example of the Edinburgh cycle store is excellent. Not so the combined refuse and cycle store. Who would want to store a bike next to a rubbish bin – unhygienic and unpleasant.

Page 78 states UPVC windows, doors, fascias and cladding are not acceptable, I am curious to know what they use now? And who needs that awful cladding anyway.

Page 103 Historic village centres and non-conservation villages (Scratby, Ormesby St Michael, Filby, Mautby, Fritton, etc.). You state development proposals are limited to small infill and on-plot replacement dwellings, extensions, and upgrades to improve energy efficiency. Why then do we see the council looking at 41 homes (down from 67 in 2020) at Scratby (copy of Mercury report dated 8/9/23 attached) and the planning committee recommending councillors approval Badger Homes application! 'Selective planning' I think. Under your intended site selection for 2030-2040 you have swathes of land (fields) within and around the 5-10 historic village centres remit, that you are looking to use for major housing development. These site selections make a mockery of your rules to protect neighbourhoods and residents. If all governments had managed our migration properly, we would not be needing millions of extra homes ruining our countryside. Ukrainian and Afghanistani peoples had great difficulty moving to safety here, in great need of asylum the 'red tape' was horrendous and impossible, whilst access via the English Channel 'no problem'.

Whilst this document is not part of the 2030-2040 site selection, I hope you will remember the 5-10 historic village centres in your future plans. If Caister can come to Filby's doorstep via Nova Scotia Farm, Ormesby St. Margaret can come to Filby's Ormesby Lane fields (up to the chicken house?) and merge with Caister's building projects, whilst going up to and including Scratby I would suggest something is very wrong with your vision for the future of Great Yarmouth and surrounding villages (do remember Caister is a town not a village). You will not be protecting or considering residents wishes if you place the afore mentioned sites into your 'allocated' pot for future development. Developers would be very pleased that you are so accommodating to their needs for future pay days and profits, and for the government you would solve some of the housing crisis. That it would ruin this area for everyone would be 'unfortunate' but the developers and governments housing departments (and that includes whoever wins the next general election) would be very happy.

Page 111 with regard to brick colour, I feel yellow/mellow coloured bricks are much more pleasing to the eye than the red bricks and I would like to see these included in your development acceptability – grey stone colour could also be considered. I also think the apartments on page 84, fig.59 picture are visually acceptable although only to 3 floors not 5.


Finally, just to remind you that this is a farming area producing our food, I enclose a copy of a picture of a vessel loaded with wheat for export/shipment from our outer harbour from the Mercury dated 4/8/23. Record grain exports need fields not major housing developments – Nova Scotia Farm!!!

Appendix 3 – Schedule of Modifications to Final GY Design Code

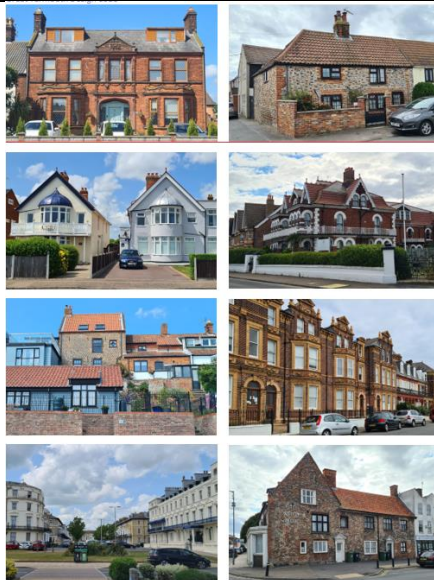
Page of Final (Adopt) Version GY Design Code SPD	Paragraph/ Fig/ Appendix of Final (Adopt) Version of Design Code SPD	Modification/ change suggested by	Modifications/changes made to Final (Adopt) Version of GY Design Code SPD
4.	1.1 Scope and purpose of the Design Code	Internal (GYBC)	<p>Amendments to second paragraphs as:</p> <p>It is a tool to assist in meeting the Strategic Objectives of the Adopted Local Plan¹, which include designing local environments to be high quality and more resilient to a changing climate; and enhancing the quality of the borough's building environment by improving the character of its townscapes and promoting local distinctiveness. <u>The Design Code is intended to inspire higher standards of design across the borough, creating better places for generations to come. It is also intended to ensure more certainty, consistency and speed in the determination of planning applications at all scales, making the planning process more effective at delivering new development that meets the needs of the local area.</u></p>
4.	1.2 Status of the Design Code	K. Newnham,	<p>Amendment to second and third paragraphs as:</p> <p>The Great Yarmouth Design Code is intended for adoption as a Supplementary Planning Document supporting the Adopted Local Plan. In due course, subject to potential reforms of the planning system, the Design Code may be incorporated into the new Local Plan, or be adopted as a Supplementary Plan.</p> <p>When adopted, the Design Code will have <u>has been adopted as a Supplementary Planning Document and has</u> material weight in the assessment of planning applications by the Borough Council as the Local Planning Authority, as well as in appeals. <u>Following the passing of the Levelling Up and Regeneration Action 2023, the Design Code may be incorporated into the new Local Plan, or be adopted as a Supplementary Plan.</u></p>

5.	1.4 Structure of the Design Code	Bourne Leisure (via Lichfields)	<p>Amendments to 'Borough wide design requirements' as:</p> <p>Borough wide design requirements: these summarise design standards that apply across the whole borough area., where relevant to the type of development. These are organised thematically and are aligned to the structure of the National Model Design Code.</p>
5.	1.4 Structure of the Design Code	Broadland Housing Association (via Bidwells)	<p>Amendments made to the 'Required, expected and best practice code elements' as:</p> <p>Some elements of the design code capture mandatory requirements, set out in national, county level or local policy, that all development must comply with.</p> <p>Other code requirements should be met, but are not mandatory as they are subject to discretion and may need to be balanced against other aspects of design. If development proposals do not comply with these code requirements, the onus will be on applicants to demonstrate why compliance is not feasible or appropriate.</p> <p>The code also includes recommendations that are intended to assist applicants in preparing the best possible design proposals. These represent best practice above and beyond mandatory requirements and policy. We hope that applicants will take the opportunity to use these recommendations to improve their proposals, in order to sustain, enhance and improve the distinctive character of Great Yarmouth.</p> <p><u>Within the SPD design requirements are set out for specific types of development proposal. These are categorised as: 'Required'; 'Expected'; and 'Best Practice'. These seek to provide additional detail on how to comply with the policies set out in the Local Plan. They do not introduce new policy, but provide a practical guide to what would be considered to constitute policy compliance.</u></p> <p><u>Applicants will be expected to demonstrate that proposals are designed in compliance with the requirements set out. As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal and in some cases, applicants may demonstrate that it would be unfeasible, or unviable to be fully policy compliant in every detail, or that betterment can be achieved via a different approach. However, the onus is on applicants to justify their approach in these cases.</u></p> <p><u>All 'required' standards are based on national or local policy requirements. All development should comply with these required standards, unless there are strong planning reasons to justify an alternative approach. These 'required' elements carry the most weight in the assessment of the planning balance.</u></p>

			<u>All 'expected' standards are recognised approaches to meeting the expectations of policy. Other ways of demonstrating compliance may be acceptable, but will need to be assessed on a case by case basis.</u>
6.	1.6 How the Design Code has been developed	Internal (GYBC)	<p>Insertion of new section 'How the Design Code has been developed' as:</p> <p><u>The Design Code has been developed through extensive consultation and engagement with statutory bodies, stakeholders and representatives of the local community, and in line with the National Model Design Code and National Design Guide. It follows the approach set out in national guidance to be locally specific and relevant in terms of the level of analysis and the focus of the Design Code.</u></p> <p><u>A steering group including representatives from Norfolk County Council including Highways, the LLFA, and tree officers, along with Great Yarmouth Borough Council planning and conservation officers, and Historic England, have guided the process. The content of the design code reflects the input of these stakeholders and represents agreed approaches to designing high quality buildings, streets, spaces and developments of all kinds.</u></p> <p><u>Engagement at the drafting stage took place with parish and ward councillors, applicants and agents from the development sector, the Great Yarmouth Civic Society, and other stakeholders including Natural England, the Environment Agency, and Active Norfolk. Full public and statutory consultation took place on the draft Design Code in 2023, following which amendments were made in response to comments received.</u></p>
7.	2.1 Landscape character, coastal change and flood risk	Broads Authority	<p>Amendments to the second paragraph as:</p> <p>The borough includes a number of important landscape and green infrastructure designations. Aside from the Broads National Park area, for which the Broads Authority is the LPA, these include:</p>
8.	2.2 Historic development	Internal (GYBC)	<p>Amendments to second and third paragraph as:</p> <p>Great Yarmouth, as the main town in the borough, developed in three distinct areas - the medieval town - for a short period, a more prosperous mercantile centre than Norwich - within the walls, the 19th century expansion as a seaside resort coupled with its continuing importance for fishing and fish processing, and the 20th century expansion with estate housing development after WW1 and continuing after WW2 and to the present day. <u>Great Yarmouth Market is one of the largest historic market-places in Britain; a market is presumed to have existed at Great Yarmouth long before the granting of King John's charter of 18 March 1207-1208.</u></p> <p><u>Until the 19th century, building was only permitted within the Medieval town walls. The limited space dictated that houses were built as closely together as possible, which led to the development of The</u></p>

			<p><u>Rows. Unique to Great Yarmouth, the Rows were a network of 145 very narrow streets which ran parallel to each other. They were so narrow that a special 'Troll Cart' was developed to transport goods along them. The Rows took up most of the land inside the town walls. At first both rich and poor people lived there together.</u></p> <p><u>The wealthier people gradually moved out, and their houses were divided up into smaller properties. This left a diverse range of architecture. Grand merchant houses stood next to tiny dwellings which were built back-to-back with the houses in the next row.</u></p>
8.	Figure 1	Internal (GYBC)	<p>Insertion of new Figure 1 as:</p>  <p><u>Fig. 1. Faden's map of 1797, showing the historic pattern of Rows and Plains inside the medieval walls of Great Yarmouth. The map can be further explored at http://www.fadensmapofnorfolk.co.uk/</u></p>
9-10.	2.3 Local building materials	Internal (GYBC); Historic England	<p>Amendments to third, fourth, fifth and sixth paragraphs as:</p> <p>Painted brick, and render, is not as common <u>commonly seen today</u> as exposed brick or flint, <u>due in part to the erosion of historic lime renders</u>, but is was relatively frequently used. <u>Historically, many brick and/or flint buildings would have been rendered - unless decorative flint or brickwork was meant to be exposed - to protect the rubble core of the flint walls as well as the soft Norfolk brick.</u></p> <p>In many locations the choice of paint as a finish was determined by weathering characteristics, with black tar paint on north- or west-facing elevations due to the prevailing wind exposure and risk of damp, or</p>

			<p>seaward elevations in coastal locations, as a protective coating. South- and street-facing elevations were typically paint <u>limewashed</u> in white or in other colours <u>which were determined through locally available natural pigments</u></p> <p>Timber weatherboarding is <u>can be</u> found in rural areas, <u>particularly on agricultural buildings</u>, but <u>is</u> relatively infrequently <u>infrequent</u>, and is <u>has since the 19th century been</u> typically painted black <u>with tar</u> for improved weathering in the same way as the painting of brick buildings, with <u>limewash</u> - <u>both</u> white or other colours and <u>coloured</u> - on less exposed elevations. Pantiled roofs - which have a Dutch origin - are typical for vernacular buildings, in both red and black <u>glazed</u> forms, while <u>reed</u> thatch was highly prevalent historically, due to the Broads reedbeds, but was largely replaced with hard roof coverings during the 19th and 20th centuries. Plain tile also found, and slate became common after the coming of the railways meant that importing Welsh slate became economic.</p>
10.	2.4 Heritage designations and assets	Internal (GYBC); Historic England	<p>Amendments to first, second and third paragraphs as: The borough includes a wide range of heritage assets, many of national significance. <u>The borough includes 431 listed buildings, 9 are considered to be at risk, 14 Scheduled Ancient Monuments and 18 Conservation Areas. These heritage assets can be enhanced by development within their settings, but can also be harmed by inappropriate design.</u></p> <p>These are highlighted, where relevant, in character area descriptions and the relevant guidance and information should be consulted, including the Conservation Area Appraisal, for Conservation Areas, and <u>such as</u> the Historic England listing entry, for listed buildings, scheduled ancient monuments and historic parks and gardens.</p> <p>Conservation Area Appraisals <u>are in the process of being prepared</u> for the borough are currently unavailable online but can be obtained on request from the <u>borough's Conservation Team</u>. <u>When published and/or adopted, these should also be considered as part of the informing process for future planning applications within those specific areas.</u></p>
12.	Figure 3	Historic England	<p>Insertion of photographic examples of building materials and details for the Great Yarmouth area as Figure 3:</p>

			
13.	Figure 4	K. Newnham	Amendment to Figure 4 annotation as: Fig. 4. 1797 Faden map, current boundary of Great Yarmouth borough indicated in red. <u>The map can be further explored at http://www.fadensmapofnorfolk.co.uk/</u>
14.	Figure 5	K. Newnham	Amendment to Figure 5 annotation as: Fig. 5. Ordnance Survey map from 1888. <u>This map can be further explored via the National Library of Scotland website, https://maps.nls.uk/</u>
15.	Figure 6	K. Newnham	Amendment to Figure 6 annotation as: Fig. 6. Ordnance Survey map from 1949. <u>This map can be further explored via the National Library of Scotland website, https://maps.nls.uk/</u>
17.	3.1 Design Vision	NCC Public Health	Amendment to fourth bullet point as: <ul style="list-style-type: none"> Be designed for the lifestyles, technology and needs of the present and the future, <u>including supporting health and wellbeing</u>, while complementing the heritage and landscapes of the borough.
18.	4.1 Addressing climate change and conserving resources	Internal (GYBC)	Amendments to first paragraph as: Climate change is the biggest challenge we face and it is a strategic priority that <u>for</u> all development proposals to <u>address this</u> challenge through mitigation and adaptation.

18.	CC1: Ensure walking, cycling and public transport are the natural modes of travel for all users	Broadland Housing Association (via Bidwells)	<p>Amendments to 'Expected' criteria as: Minimise the walking distance from front doors to public transport nodes <u>through site layouts that incorporate direct walking routes.</u></p> <p>Ensure all development is <u>as accessible as possible</u> by public transport, <u>by clustering development around existing or proposed public transport routes and increasing the density of development around public transport nodes.</u></p>
20.	Figure 9	Broads Authority	<p>Amendments to Figure 9 annotation as: Summer sun angle – <u>overhangs and awnings exclude direct sunlight and associated heat gains</u></p> <p>Winter sun angle – <u>Retractable awnings can be raised in winter to allow solar heat gain.</u></p> <p>Amendment to fourth paragraph of Figure 9 annotation as: Floor-to-ceiling glazing on south-facing elevations contributes little to daylighting internal spaces, but increases. <u>It can cause light pollution issues, and increase</u> overheating unless shaded from direct sun. Raising sills makes overheating less likely.</p>
21.	CC3: Integrate on-site renewable energy generation and low and zero carbon heating, cooling and ventilation systems	Broadland Housing Association (via Bidwells), Internal (GYBC)	<p>Amendments to 'Expected' criterion as: Use air source or ground source heat pumps to provide heating.</p> <p>Amendments to 'Best Practice' criterion as: <u>Use air source or ground source heat pumps to provide heating where practicable.</u></p> <p>No gas connections should be provided to new development</p> <p>Use mechanical ventilation with heat reclaim (MVHR) ventilation systems. and do not provide active cooling (air conditioning).</p>
21.	Using passive design and low-carbon technology (dialogue box)	Internal (GYBC)	<p>Amendment to fourth and sixth paragraphs as:</p> <p>Heating uses far more energy than lighting and small power, so reducing carbon emissions from heating is very important. Using gas for heating directly emits greenhouse gas emissions and should not be used.</p> <p>The UK's electricity network is rapidly becoming entirely low-carbon, so using electricity to heat buildings does not involve high carbon emissions. Direct electric heating (such as electric panel heaters) is expensive</p>

			to run, but air-source or ground- source heat pumps are energy-efficient so should be used as the heat source <u>where practicable</u> . Solar thermal panels (which are different from PV panels, which only generate electricity) are also an effective way to provide zero-carbon hot water and heating.
22.	CC4: Minimise potable water use	Broadland Housing Association (via Bidwells)	<p>Amendments to ‘Expected’ criterion as: Integrate rainwater harvesting and greywater reuse to reduce potable water use <u>in non-residential developments.</u></p> <p>Amendments to ‘Best Practice’ criterion as: <u>Integrate rainwater harvesting and greywater reuse to reduce potable water use for residential developments.</u></p>
22.	CC5: Reduce embodied carbon emissions resulting from construction	Broadland Housing Association (via Bidwells); McCarthy & Stone (via Planning Bureau)	<p>Amendments to ‘Expected’ criterion as: Retain and reuse existing structures where this is the most carbon efficient option and the structure contributes, or can be suitably adapted, to the positive character of the local area.</p> <p>Amendments to ‘Best Practice’ criterion as: <u>Retain and reuse existing structures where this is the most carbon efficient option and the structure contributes, or can be suitably adapted, to the positive character of the local area.</u></p>
23.	CC6: Ensure development is flood safe and flood resilient	Broadland Housing Association (via Bidwells); Lead Local Flood Authority	<p>Amendments to ‘Expected’ criterion as: Use salt tolerant materials and construction below the flood datum, in areas at risk of tidal flooding. <u>Comply with LLFA guidance for flood safety and resilience.</u></p> <p>Include new ‘Best Practice’ criterion as: <u>Use salt tolerant materials and construction below the flood datum, in areas at risk of tidal flooding.</u></p>
23.	CC7: Reduce the risk of surface water flooding on and around the site	Lead Local Flood Authority; Anglian Water; Hemsby Parish Council	<p>Delete ‘Required’ criteria as: Meet surface water run-off rates required by the Lead Local Flood Authority (LLFA). Submit detailed design drawings of all proposed SuDS features to demonstrate compliance with the principles and standards set out in the CIRIA SuDS Manual.</p> <p>Amendments to ‘Expected’ criteria as: <u>Apply the LLFA’s Developer Guidance appropriately to all developments for surface water management.</u></p> <p><u>Meet surface water run-off rates required by the Lead Local Flood Authority (LLFA).</u></p>

			<p><u>Submit detailed design drawings of all proposed SuDS features to demonstrate compliance with the principles and standards set out in the CIRIA SuDS Manual.</u></p> <p>Design SuDS to be multifunctional, for example as wildlife habitats, for formal or informal recreation, for parking, and/or supporting <u>to support</u> community educational learning, and/or for rainwater/stormwater harvesting and reuse.</p> <p>Avoid fences around SuDS features such as ponds and watercourses, <u>through design of gradients and depths, and use of natural planting as a barrier.</u></p>
25.	CC8: Reduce urban heat island effect	Broadland Housing Association (via Bidwells)	<p>Delete 'Expected' criterions as: Minimise hard landscaping and maximise soft landscaping, including water surfaces.</p> <p>Shade hard landscaped spaces, streets and paths through tree planting and/or awnings and other adjustable shading devices.</p> <p>Use insulating and heat reflecting materials for both buildings and landscapes, including for roofs. These can include green and brown roofs and light coloured materials.</p> <p>Include new 'Best Practice' criterions as: <u>Minimise hard landscaping and maximise soft landscaping, including water surfaces.</u></p> <p><u>Shade hard landscaped spaces, streets and paths through tree planting and/or awnings and other adjustable shading devices.</u></p> <p><u>Use insulating and heat reflecting materials for both buildings and landscapes, including for roofs. These can include green and brown roofs and light coloured materials.</u></p>
25.	CC9: Minimise resource usage through future building maintenance, alterations and adaptation	Broadland Housing Association (via Bidwells)	<p>Delete 'Expected' criterions as: Use materials that can be reused and recycled at end of life</p> <p>Design to minimise energy intensive maintenance requirements over the lifetime of the development.</p> <p>Design buildings to be adaptable to different uses without requiring demolition.</p>

			<p>Design short-life systems and materials—for example mechanical and electrical installations—to be replaceable without requiring substantial alterations to long-life building elements, such as structure and external envelope.</p> <p>Include new ‘Best Practice’ criteria as:</p> <p><u>Use materials that can be reused and recycled at end of life</u></p> <p><u>Design to minimise energy intensive maintenance requirements over the lifetime of the development.</u></p> <p><u>Design buildings to be adaptable to different uses without requiring demolition.</u></p> <p><u>Design short-life systems and materials—for example mechanical and electrical installations—to be replaceable without requiring substantial alterations to long-life building elements, such as structure and external envelope.</u></p>
25.	Reducing the urban heat island effect (new dialogue box)	Broadland Housing Association (via Bidwells)	<p>Insertion of new dialogue box ‘Reducing the urban heat island effect’ as:</p> <p><u>Reducing the urban heat island effect</u> <u>The urban heat island effect occurs when hard landscaping, a lack of shading, and dark coloured materials absorb heat from the sun and increase temperatures in the area. A recent study showed that the Kilburn and South Hampstead area in London, with 38% vegetation cover, experienced heat over 7°C hotter than Regent’s Park with 89% vegetation cover, just a short distance away.¹</u> <u>Urban heat is a particular problem at night, due to materials like concrete and stone absorbing heat in the day then slowly releasing it at night. This prevents urban areas cooling down, intensifying heatwaves, and can cause stress and health issues and acutely impacts vulnerable citizens – including children and the elderly.</u></p> <p><u>Vegetation cover and albedo are two of the most important factors which determine the strength of the urban heat island effect. Albedo describes how reflective a surface is. High albedo surfaces, such as white roofs, are reflective and absorb less heat than low albedo surfaces such as asphalt roads. Vegetation cools the air around it through the evaporation of water.</u></p>

			<p><u>Spaces that are designed to maximise vegetation, shade and high albedo surfaces, can reduce the urban heat island effect and make built-up areas more comfortable, as well as reducing energy use on cooling internal spaces, and encouraging people to walk and cycle during hot weather.</u></p> <p><u>1 Arup, Urban Heat Island Snapshot, 2023 - https://www.arup.com/perspectives/publications/research/section/urban-heat-snapshot</u></p>
26.	Useful Resources	Lead Local Flood Authority; Natural England	<p>Amendment to Useful Resources as:</p> <ul style="list-style-type: none"> • Norfolk County Council are preparing a SuDS adoptions guidance manual. When finalised, the Design Code will be updated to include a reference. • <u>Natural England guidance - Introduction to Freshwater Wetlands for Improving Water Quality - JP044 (https://publications.naturalengland.org.uk/)</u> • <u>Norfolk County Council, as the LLFA, have guidance for developers at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers</u>
27.	CI1: Design with regard to local context, including the surrounding built environment, topography, landscape and drainage.	Anglian Water	<p>Amendment to 'Expected' criterion as:</p> <p>Analyse the site context with regard to development form and pattern, landscape <u>topography and character</u>, heritage assets, green and blue spaces, <u>underlying soils and geology</u>, views to and from the site, and locally prevalent materials and building details, and submit analysis within Design & Access Statement.</p>
29.	CI3: Create a positive and distinctive sense of place for new development	Lead Local Flood Authority; Persimmon Homes	<p>Amendment to 'Expected' criteria as:</p> <p>Include distinctive, beautiful and unique features within major development. Features may include landmark buildings, high quality public art, public realm and landscaping, <u>including SuDS.</u></p> <p>Create a range of character areas within large-scale housing developments which comprise significant extensions to existing settlements (such as those allocated by Policies CS18, GN1 and CA1) to achieve a clear design identity for each street or cluster. This <u>should also be addressed at outline application stage as part of a masterplanned approach, and</u> can be achieved through the use of different approaches to layout, house designs, or variation in materials and details.</p>
29.	Figure 14	Internal (GYBC)	<p>Amendment to first annotation under Figure 14:</p> <p>Examples of large sites with clearly defined character to different parts of the development, achieved through careful masterplanning. <u>Both developments show a legible and well-connected street layout using a broadly gridded arrangement.</u></p>

			<p>Deletion of fourth annotation under Fig 14: Both developments show a legible and well-connected street layout using a broadly gridded arrangement.</p>
30.	CI4: Use external materials and detailing which complement the local context and are appropriate for the local climate	Badger Building	<p>Amendment to 'Expected' criterion as: Alterations and energy efficiency improvements should not obscure high quality existing external materials such as brick and flint work. Replacement windows, balcony metalwork and similar should be of similar quality as the existing —upVC windows, doors, fascias and cladding are not generally acceptable material.</p>
32.	SM1: Create a walkable and integrated network of streets and pedestrian/cycle routes.	Sport England	<p>Amendment to 'Expected' criterion as: Use site layouts to link existing streets, paths and cycle routes in the wider area, and to create new cycling and walking routes that connect local destinations <u>and encourage active travel.</u></p>
33.	SM2: Design movement routes to clear and consistent standards which prioritise vulnerable users, children, pedestrians and cyclists.	Internal (GYBC)	<p>Amendment to 'Expected' criterion as: <u>Follow the principles of the street design examples in figures 17-23, which show indicative acceptable approaches to new streets within new masterplanned development.</u></p>
42.	SM4: Ensure the amount and design of cycle parking and storage encourages cycling on an everyday basis	Broadland Housing Association; Persimmon Homes; Internal (GYBC)	<p>Amendment to title of design code 'SM4' as: SM4: Ensure the amount and design of cycle parking and storage incentivises encourages cycling on an everyday basis</p> <p>Amendment to 'Required' criterion as: Meet NCC minimum requirements for the amount and design of cycle storage and parking across all forms of development.</p> <p>Amendment to 'Expected' criterion as: Meet <u>For non-residential development, meet NCC minimum requirements for the amount and design of cycle storage and parking.</u></p>

			<p>For residential development, meet the following requirements for cycle storage in order to meet household needs in full, including cycles for children, for sport and leisure, and for visitors.</p> <ul style="list-style-type: none"> For one-bedroom dwellings and HMOs, provide 1 resident cycle space per bedspace, and 1 visitor space per dwelling (which can be uncovered/HMO room. For dwellings of two or more bedrooms, provide 1 resident cycle space per bedroom, plus one additional resident space, and outside of 1 visitor space per dwelling. For example a secure enclosure, three-bedroom dwelling should have 4 resident spaces and 1 visitor space.e.g. a Sheffield stand). For retirement housing, provide 1 secure resident cycle space, and one visitor cycle space, per two bedspaces. Many older people use cycles, and in particular e-bikes, for exercise and leisure. For all residential cycle storage, provide one electric outlet per two cycle spaces to facilitate e-bike charging. Provide adequate secure cycle storage to accommodate at least one cargo bike per dwelling. Cycle storage must be additional to garages counted as an allocated parking space <u>towards vehicle parking standards , unless the garage is large enough to accommodate cycle parking as well as a car.</u> Cycle storage can be within curtilage of dwelling but must be secure and covered e.g. cycle locker; dedicated store/shed; dedicated space within hallway/ secure porch; dedicated space within expanded garage. <u>Visitor spaces can be uncovered and outside of a secure enclosure, e.g. a Sheffield stand.</u> <p><u>Where practicable, locate</u> cycle storage closer to entrance doors, than car parking/ storage.</p> <p>Amendment to Policy links relating to ‘SM4’ as: A2: Housing design principles <u>CS9: Encouraging well-designed, distinctive places</u> <u>I1: Vehicle parking for developments</u></p>
42.	Figure 26	Internal (GYBC)	<p>Deletion of second and third annotation under Figure 26: Left: Secure cycle store in Edinburgh has good visibility, deterring theft.</p> <p>Right: cycle store and refuse store combined in an attractive and durable enclosure as part of front curtilage yard space.</p>

46.	PS1: Integrate existing natural features, including water and trees, in site layouts	Internal (GYBC)	Amendment to Policy links relating to 'PS1' as: <u>A2: Housing design principles</u>
47.	PS2: Provide a sufficient quantity, type, and quality, of public open space and green infrastructure with development	Broadland Housing Association; Persimmon Homes	Amendment to 'Required' criterion as: Quantity of open space provided must comply with Policy H4 - Open Space SPD <u>provision for new housing development - and should refer to the Open Space SPD which contains numerical standards</u> and some guidance on typology design requirements in Appendix 2.
48.	PS4: Improve biodiversity on and around the development site	Lead Local Flood Authority; Broadland Housing Association (via Bidwells);	Delete 'Required' criterion as: Design development to maximize the opportunity of securing at least 10% biodiversity net gain on-site. Amendment to 'Expected' criterion as: Use the location, type and design of open spaces, <u>including SuDS</u> , to improve the connectivity of wildlife habitats in the wider area, including the potential to connect to habitats that may be created through future adjacent development.
49.	PS5: Include street trees along movement routes and as part of public spaces	Sport England; Persimmon Homes;	Amendments to 'Expected' criteria as: Position street trees on median strips, in verges, between parking bays, and/or on pavements of sufficient width <u>so as not to block active travel routes and infrastructure.</u> On sites close up to <u>1km from</u> the sea, plant salt tolerant species such as, <u>but not limited to,</u> Whitebeam or Holm Oak. Hawthorn and Pendunculate <u>Pedunculate</u> Oak are also tolerant of cold exposed sites.

49.	Useful Resources	Norfolk County Council Natural Environment Team; Sport England	<p>Amendments to Useful Resources as:</p> <ul style="list-style-type: none"> • <u>CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments (ciria.org)</u> • <u>Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure (https://naturalengland.blog.gov.uk/wp-content/uploads/sites/183/2022/03/BNG-Brochure_Final_Compressed.pdf)</u> • <u>Active Design Guidance - https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</u>
52.	BF2: Ensure an appropriate sense of enclosure of streets and public spaces, and clear relationships between public and private space	Internal (GYBC)	<p>Amendments to 'Expected' criterion as:</p> <p>Create a visual sense of enclosure with a good relationship between the height and massing of buildings, landscape features (including trees) and the street. In urban settings, local centres and high streets, building heights should be equal or greater than the width of the space between them. In other locations, building heights should be approximately half the width of the space between them. In lower density locations, the scale of street trees should be at least as tall as buildings when mature <u>Example design approaches are shown in figures 17-23 and should be used as reference.</u></p> <p><u>In urban settings, local centres and high streets, the ratio of building heights to street width should be between 1:1 and 1:2. In other locations, the ratio of building heights to street width should be between 1:1 and 1:5. Street trees should be as tall as height of buildings or taller in accordance with the street code example layouts.</u></p>
53.	Figure 34	Persimmon Homes	<p>Amendment to Figure 34 annotation as:</p> <p>Diagrams from National Model Design Code showing recommended <u>suggested</u> ratios of building height to street width for different street types <u>and different neighbourhood types. A site specific approach should be taken to establish the most appropriate enclosure ratio, with reference to area specific code requirements and Streets and Movement section of the design code.</u></p>
58.	BD3: Create functional and accessible new homes with sufficient internal space.	Broadland Housing Association (via Bidwells); Persimmon Homes	<p>Amendments to 'Expected' criterion as:</p> <p>Meet the Nationally Described Space Standards (NDSS) for the internal spaces within dwellings.</p> <p>Meet the M4(2) standard (accessible and adaptable) within Part M of the Building Regulations, for all new homes unless impractical, <u>for example</u> due to site topography or flood risk. For homes within Flood Zone 3, where habitable spaces cannot be provided on the entrance storey, include lift access, or internal staircases which are sized to permit the installation of a stairlift if required, from street level to habitable spaces above the flood datum.</p>

			<p>Amendment to 'Best Practice' criterion as: <u>Meet the Nationally Described Space Standards (NDSS) for the internal spaces within dwellings.</u></p>
59.	BD5: Ensure adequate privacy for habitable rooms (living rooms, dining rooms, kitchens or bedrooms) and private outdoor amenity space	Persimmon Homes	<p>Amendments to 'Expected' criterion as: When rear-facing or side-facing windows into habitable rooms are directly opposite each other, ensure a minimum separation of 25m 20m unless windows are obscured or a fence or other visual barrier of above eye-level height (as viewed from the potential vantage point) is designed in.</p> <p>Where living rooms are located above ground level, rear-facing windows should be a minimum of 35m 30m from rear-facing windows into habitable rooms of any other dwelling.</p>
59.	Figure 40	Persimmon Homes	<p>Amendment to first annotation in relation to Figure 40 as: Minimum 25m 20m between habitable rooms. If upper rooms are living rooms, increase to 35m 30m.</p>
60.	BD6: Provide sufficient quality and quantity of private outdoor amenity space for residential development	McCarthy & Stone (via Planning Bureau); Internal (GYBC)	<p>Amendments to 'Expected' criterion as: Provide external private amenity space that meets the following minimum standards:</p> <p><u>Specialist housing, including older people's housing, is not required to meet these requirements but should demonstrate that adequate good quality, accessible and functional outdoor amenity space is provided for residents.</u></p> <p>Amendment to 'Policy links' relating to 'BD6' as: CS9(i): Encouraging well-designed, distinctive places</p>
61.	BD7: Provide convenient and discreet refuse storage and utilities to meet user requirements.	Internal (GYBC)	<p>Delete 'Required' criterions as: Provide residential refuse storage areas that meet the requirements of the local waste collection service.</p> <p>Demonstrate that commercial development proposals include adequate space for refuse storage and collection.</p> <p>Amendment to 'Expected' criterion as:</p>

			<p><u>Provide residential refuse storage areas that meet the requirements of the local waste collection service.</u></p> <p><u>Demonstrate that commercial development proposals include adequate space for refuse storage and collection.</u></p>
62.	BD9: Use boundary treatments that contribute positively to the character of the public realm and wider landscape.	Hemsby Parish Council	<p>Amendment to 'Expected' criterion as: Ensure natural surveillance to streets and public spaces by limiting boundary treatments to the front of buildings to below 1.2m 1m in height.</p>
62.	BD10: Provide external lighting which minimises light pollution while ensuring safety.	Broads Authority	<p>Amendments to 'Expected' criteria as: Design <u>Where external lighting is required, design</u> lighting, and its controls, to preserve dark skies and avoid excessive light pollution.</p> <p>Provide adequate external lighting to ensure users of buildings and spaces, including more vulnerable user groups, feel safe at night, <u>without contributing to light pollution.</u></p>
62.	BD11: Design appropriate deterrents to nuisance bird nesting and roosting	Badger Building; Broads Authority	<p>Amendment to title of design code 'BD11' as: Design appropriate deterrents to <u>nuisance</u> bird nesting and roosting</p> <p>Amendments to 'Expected' criteria as: Design roof forms, sills, parapets <u>Consider how building form</u> and other horizontal surfaces to <u>design can</u> deter <u>nuisance</u> bird nesting and roosting, <u>such</u> as far as possible without requiring additional deterrents. <u>Include adequate access to all parts of buildings by seagulls and pigeons, while creating habitat for cleaning and maintenance</u> Include appropriate, visually discreet bird deterrents where necessary <u>threatened species such as swifts, swallows</u> and ensure <u>house martins.</u></p> <p><u>Where</u> deterrents are <u>necessary, ensure they are visually discreet and</u> minimally visible from the public realm.</p>
63.	Useful Resources	Natural England	<p>Amendments to Useful Resources as:</p> <ul style="list-style-type: none"> Institute of Lighting Professionals Guidance Note 1: reducing obtrusive lighting through design (https://theilp.org.uk/category/ilp-guidance-notes/)

66.	5.1 Great Yarmouth, within the town walls	Internal (GYBC)	<p>Amendments to second paragraph as: The area within the medieval town walls of Great Yarmouth is of high historic significance, with a high density of listed buildings surrounded by the Scheduled Ancient Monument of the Town Wall. It includes several Conservation Areas, which are well described by the corresponding Conservation Area Appraisals, as well as site specific Local Plan policies and Supplementary Planning Documents. These should be fully read and referenced in relation to any development proposals at any scale, <u>and including several Conservation Areas.</u></p> <p>Inclusion of new third paragraph as: <u>A number of site specific Local Plan policies and Supplementary Planning Documents are relevant to this character area, and these should be fully read and referenced in relation to any development proposals at any scale.</u></p>
68.	Figure 47	Internal (GYBC)	<p>Amendment to first annotation under Figure 47 as: Top left: South Quay and the waterfront. Currently somewhat dominated by vehicle traffic, this should improve with the opening of the third river crossing. <u>The Georgian waterfront is mainly of brick.</u></p> <p>Amendment to fifth annotation under Figure 47 as: Some well-restored and sensitively infilled streets remain, <u>with new development and adaptation of existing buildings using traditional materials such as brick, pantiles and timber,</u> but car parks disrupt the historic row pattern.</p>
69-70.	5.1 Great Yarmouth, within the town walls – Design Requirements	Historic England; Internal (GYBC)	<p>Amendments to ‘Height and massing’ requirements as: Two storey development is not <u>generally</u> approach for the urban character of the area.</p> <p>Amendments to ‘Street elevation design’ requirements as: New shopfronts <u>shopfront designs</u> should strictly follow the guidance of <u>be in accordance with the</u> Shopfronts Design Guide.</p> <p>Amendment to ‘Building design and materials’ requirements as: External façades should <u>typically</u> be predominantly <u>well-detailed and</u> high quality masonry such as brick, flint or stone <u>or traditional lime render.</u> Timber cladding <u>weatherboarding</u> can be appropriate in small areas. Render should be avoided. Visible <u>More prominent</u> pitched roofs should be slate, good quality plain or pan tiles, zinc <u>or pantiles,</u> or other standing seam <u>metal</u> roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>

			<p>Amendment to 'Landscape design and materials' requirements as: <u>Create public access to the full length of the Town Wall on both sides, where physically feasible, with associated public realm and landscaping which can include active uses (play, outdoor seating, outdoor gym, café seating sport and recreation).</u></p> <p>Amendment to 'Other' requirements as: Create public access to the full length of the Town Wall on both sides, where physically feasible, with associated public realm and landscaping which can include active uses (play, outdoor seating, outdoor gym, café seating sport and recreation).</p>
71.	5.2 Great Yarmouth Seafront	Internal (GYBC)	<p>Amendments to second paragraph as: The seafront character area stretches from Jellicoe Road in the north to Main Cross Road in the south. It includes the buildings and landscapes on both sides of the seafront road (Marine Parade, North Drive) and includes the major tourist destinations of Great Yarmouth as well as the beach itself. Part of the character area is covered by the Seafront Conservation Area and is well described in the Conservation Area Appraisal, and site specific policies in the Local Plan also apply to parts. <u>These should be fully read and referenced in relation to any development proposals at any scale.</u></p> <p>Amendments to first paragraph under 'Marine Parade/South Beach Parade' as: Most of this part of the seafront is well described in lies within the Seafront and Camperdown Conservation Area Appraisals which should be fully considered. The following is a high level summary <u>of the characteristics of the conservation area.</u></p>
74-77.	5.2 Great Yarmouth Seafront – Design Requirements	Historic England	<p>Amendment to 'Height and massing' requirements as: Marine Parade/South Beach Parade (east side): Due to the nature of seafront attractions, height parameters are not appropriate but building heights and massing should be carefully determined <u>through site specific analysis</u> to limit impact on views and setting of heritage assets.</p> <p>Amendment to 'Street elevation design' requirements as: Elevation design could should include ornamental and decorative detailing including bay windows, decorative metalwork to balconies, eaves and verge detailing and shaped timber fascias, <u>while ensuring maintenance is fully considered.</u></p> <p>Amendment to 'Building design and materials' requirements as:</p>

			<p>North Drive: External façades should use good quality typically be appropriately detailed brick, flint, or hung tile. Visible Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain or pan tiles, zinc or pantiles, or other standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Amendment to 'Other' requirements as: Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals. Enhancing the appearance and setting of the many listed buildings along the seafront must be a priority.</p>
78.	5.3 Gorleston town centre and historic core	Internal (GYBC)	<p>Amendments to second paragraph as: This character area comprises the historic core of Gorleston, including the Conservation Area between the southern length of its High Street and eastern industrial estate. The remaining region of the town centre to the north is within the Gorleston Conservation Area Extensions. Its corresponding Conservation Area Appraisal and Management Plan should be fully read and referenced in relation to any development proposals within the bounds of both the Conservation Area and its proposed extensions.</p>
80-81.	5.3 Gorleston town centre and historic core – Design Requirements	Internal (GYBC)	<p>Amendments to 'Street elevation design' requirements as: New shopfronts shopfront designs should strictly follow the guidance of be in accordance with the Shopfronts Design Guide.</p> <p>Amendments to 'Building design and materials' requirements as: External façades should typically be predominantly well-detailed and high quality masonry such as brick or, flint, or traditional lime render or painted brick in colours drawn from the local palette. Timber cladding weatherboarding can be appropriate in small areas but fibre cement cladding is not appropriate. Visible. More prominent pitched roofs should be slate, good quality plain or pan tiles, zinc or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Alterations and energy efficiency improvements should not obscure high quality existing external materials such as brick and flint work. Replacement windows, balcony metalwork and similar should be of similar quality as the existing —UPVC windows, doors, fascias and cladding are not acceptable.</p>
86.	5.5 Great Yarmouth and Gorleston port and industrial areas	National Property Grid	Amendment to third bullet point under 'Areas characteristics' as:

		Holdings (via First Plan)	<ul style="list-style-type: none"> There is a notable contrast between South Quay (historic waterfront) and the industrial development pattern on the other side of the river although they are seen together in the prominent riverfront vistas. <u>The Victorian gasholder is prominent in long views.</u>
88-89.	5.5 Great Yarmouth and Gorleston port and industrial areas – Design Requirements	Internal (GYBC); National Grid Property Holdings (via First Plan)	<p>Amendments to ‘Building design and materials’ requirements as:</p> <p>External façades should <u>typically be predominantly well-detailed and</u> high quality masonry such as brick or, flint, or traditional lime render or painted brick in colours drawn from the local palette. Timber cladding <u>weatherboarding</u> can be appropriate in small areas. Render should be avoided. Visible. <u>More prominent</u> pitched roofs should be slate, good quality plain or pan tiles, zinc or other pantiles, or standing seam <u>metal</u> roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Amendments to ‘Other’ requirements as:</p> <p><u>Views of the Victorian gasholder should be considered and enhanced by the placement and massing of new development.</u></p>
92.	5.6 Caister-on-Sea village centre – Design Requirements	Internal (GYBC)	<p>Amendments to ‘Street elevation design’ requirements as:</p> <p>New shopfronts <u>shopfront designs</u> should strictly follow the guidance of <u>be in accordance with the</u> Shopfronts Design Guide.</p> <p>Amendments to ‘Building design and materials’ requirements as:</p> <p>External façades should <u>typically be well-detailed and</u> high quality masonry such as brick or, flint, traditional lime render or painted brick in colours drawn from the local palette, or timber. <u>Timber</u> weatherboarding. Metal cladding can be appropriate in small areas. Visible <u>More prominent</u> pitched roofs should be slate, good quality plain or pan tiles, zinc or other pantiles, or standing seam <u>metal</u> roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>
97-98.	5.7 Terraced streets and squares – Design Requirements	Historic England; Internal (GYBC)	<p>Amendments to ‘Development pattern’ requirements as:</p> <p><u>Development should reinforce the strong character of this area type and avoid infill development that dilutes the terraced pattern.</u></p> <p>Amendments to ‘Building design and materials’ requirements as:</p> <p>External façades should <u>typically be well-detailed and</u> high quality masonry such as brick or, flint, traditional lime render or painted brick in colours drawn from the local palette, or timber. <u>Timber</u> weatherboarding. Metal cladding can be appropriate in small areas. Visible <u>More prominent</u> pitched roofs should be slate,</p>

			<p>good quality plain or pan tiles, zinc or other pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Amendment to ‘Other’ requirements as: Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals.</p>
100-101.	5.8 Interwar housing estates – Design Requirements	Internal (GYBC)	<p>Amendments to ‘Building design and materials’ requirements as: External façades should use good typically be well-detailed and high quality brick, flint, or hung tile, timber cladding or. Timber weatherboarding or render. Visible may also be appropriate. More prominent pitched roofs should be slate, good quality plain or pan tiles, zinc or other pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>
106.	5.10 Historic village centres	Internal (GYBC)	<p>Amendments to first paragraph as: This area type comprises the historic cores of the rural villages, predominantly made up of organic development up to the early 20th century. Historic village centres are mostly, but not all, covered by conservation area appraisals and these should be consulted where relevant. Some villages lack conservation areas (i.e. except for Scratby, Ormesby St Michael, Filby, Mautby, and Fritton, etc.) but the latter do still have an attractive informal village centres and these fall into this area type.</p>
108-109.	5.10 Historic village centres – Design Requirements	Internal (GYBC)	<p>Amendments to ‘Maximum / minimum densities / plot ratios’ requirements as: Minimum 30 dwellings per hectare.</p> <p><u>Minimum 30dph within historic village centres which fall within Belton, Hemsby, Hopton-on-Sea, Martham, Ormesby St Margaret and Winterton.</u></p> <p><u>Within other historic village centres, residential densities should be a minimum of 20 dph.</u></p> <p>Amendments to ‘Building design and materials’ as: External façades should typically be well-detailed and high quality masonry such as brick or, flint, traditional lime render or painted brick in colours drawn from the local palette, or timber. Timber weatherboarding. Metal cladding can may also be appropriate in small areas. Visible. More prominent pitched roofs should be slate, good quality plain or pan tiles, zinc or other pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>

			Amendments to 'Other' design requirements as: Maintain and enhance the character of the Conservation Areas in line with the <u>emerging</u> Conservation Area Appraisals.
110.	5.11 Plotlands	Internal (GYBC)	Amendments to first paragraph as: Great Yarmouth includes a number of 'plotland' developments which originally grew up on marginal land in mostly seafront locations. Many are now threatened by coastal <u>erosion and/or sea level rise but some remain well-loved and distinctive neighbourhoods with</u> erosion and/or sea level rise but some remain well-loved and distinctive neighbourhoods with an unusual pattern and character. Some plotland areas now lie within coastal change management areas. Development proposals within this area type are typically small-scale infill development, on-plot replacement dwellings, extensions and alterations.
111-112.	5.11 Plotlands – Design Requirements	Internal (GYBC)	Amendments to 'Other' requirements as: Maintain and enhance the character of the Conservation Areas in line with the <u>emerging</u> Conservation Area Appraisals.
113-114.	6.1 New housing developments	Persimmon Homes; Sport England	Amendments to first bullet point under 'Relationship to landscape' as: <ul style="list-style-type: none"> New housing developments are highly visible in the landscape. Layout and design should ensure they form a positive backdrop to views and in particular that boundary treatments to the edge of developments have a rural character. Fronting new development onto access lanes around the perimeter of the site is not typical and <u>Fronting new development onto the landscape is not typical in rural settings and it is preferable for rear gardens to form the boundary to the rural landscape around the development. The use of close boarded fencing on to the landscape should be avoided, instead natural boundary treatments should be used. Walking and cycling routes should provide permeability to the landscape beyond as well as views out from the development to the rural landscape.</u> it is preferable for rear gardens to form the while walking and cycling routes should provide permeability to the landscape beyond as well as views out from development to the rural landscape. Amendment to first bullet point under 'Phasing' as: <ul style="list-style-type: none"> Phased development should ensure that green infrastructure and functional walking and cycling routes are built as early as possible in order to build in active lifestyles <u>and encourage active travel</u> for new residents from the start.
117.	6.3 New industrial, commercial and retail development	Broads Authority	Amendments to first paragraph as:

			<p>Industrial, commercial and retail development fulfils important functions but, in out-of-town locations can fulfil important functions but rarely contributes in particular, frequently fails to contribute positively to the character of the local area.</p> <p>Amendments to third bullet point under 'Landscape design' as:</p> <ul style="list-style-type: none"> External Where external lighting is required, this should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.
118.	6.4 Development in the rural area	Broads Authority	<p>Amendments to second bullet point under 'Landscape design' as:</p> <ul style="list-style-type: none"> External Where external lighting is required, this should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.
119.	6.5 Holiday Parks	Bourne Leisure (via Lichfields)	<p>Amendments to second paragraph as:</p> <p>The borough-wide requirements of the Design Code apply equally to holiday park development, where relevant based on siting and context, and the following points capture some of the priorities in terms of masterplanning and integration with context.</p> <p>Amendments to first bullet point under 'Landscape setting' as:</p> <ul style="list-style-type: none"> Mitigate opportunities for Minimise recreational disturbance to natural wildlife/landscape locations through the design of the movement network/connection to green spaces as well as provision of suitable alternative natural green spaces for recreation. <p>Amendments to second bullet point under 'Landscape setting' as:</p> <ul style="list-style-type: none"> Ensure boundary treatments create a positive and attractive frontage to streets and to the countryside. Close boarded fencing is not appropriate- for boundary treatments visible from the surrounding countryside or the public realm. Static caravans and lodges must be well-screened from public view points and the view from neighbouring homes and rights of way should be enhanced by extensive on-site landscaping
	Throughout		Typographical and grammatical corrections made throughout the document.

Great Yarmouth Borough-Wide Design Code

SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Habitat Regulations Assessment (HRA) Screening Report

January 2024



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1. Introduction

- 1.1 The Conservation of Habitats and Species Regulations 2017 provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) also states that Ramsar sites should be afforded the same level of protection as the European sites.
- 1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).
- 1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states: *'Where a land use plan: (a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) Is not directly connected with or necessary to the management of the site, the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.'*
- 1.4 The HRA is therefore undertaken in stages and should conclude whether or not a plan would adversely affect the integrity of any sites.
- 1.5 The first stage is to assess whether a plan is likely to have a significant effect on a designated site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle and cannot take into account mitigatory measures. If a likely significant effect is identified, an appropriate assessment of those likely effects is then necessary.
- 1.6 This report comprises the first stage of the Habitat Regulations Assessment for the Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) and screens whether the document is likely to result in a significant effect on the integrity of designated sites.
- 1.7 The Great Yarmouth Borough-Wide Design Code SPD is a tool to help shape placemaking in the borough and will apply to all scales and forms of development within the borough (aside from areas which the Broads Authority is the Local Planning Authority), including householder applications, small sites, major developments, and regeneration sites. The SPD does not establish the principle of development across the borough but supplements the implementation of relevant design-based policies¹ in the Local Plan Part 1 Core Strategy (Adopted 2015) and Local Plan Part 2 (Adopted 2021) which have already been subject to Habitats Regulations Assessment.
- 1.8 The Screening Report has been subject to consultation alongside the draft SPD. Natural England supported the conclusions of the screening report and its findings. No other comments were made on the report.

¹ These include policies CS1, CS4, CS9, CS10, CS11, CS12, CS13, CS16, CS17, CS18, GSP6, GSP7, GY2, GY3, GY4, GY5, GY6, GY7, GY10, A1, A2, H3, H4, H8, H9, H10, H11, B1, L1, L2, E4, E5, E6, E7 and I1.

2. Protected sites covered by this report

- 2.1 The protected sites considered in this report includes all the sites considered within the Habitat Regulations Assessment for the Local Plan Part 1 Core Strategy and Local Plan Part 2. This used a starting point of looking at sites within a 20km buffer of the Borough Council's administrative boundary. The following sites within this buffer area were discounted, due to distance and a lack of an impact pathway:
- Haisborough, Hammond and Winterton SAC (marine)
 - Paston Great Barn SAC
 - Outer Thames Estuary SPA (marine)
 - Benacre to Easton Barents SAC/SPA
- 2.2 Given that this Supplementary Planning Document seeks to support the implementation of the Local Plan Part 1 Core Strategy and Local Plan Part 2 it is considered appropriate to exclude the above sites from this assessment too.
- 2.3 Therefore, the designated sites considered by this screening assessment are as follows:
- Winterton-Horsey Dunes SAC
 - North Denes SPA
 - Breydon Water SPA/Ramsar site
 - Broadland SPA/Ramsar site
 - The Broads SAC
- 2.4 Appendix 2 sets out more detail about the sites above including their interest features, condition and threats.

3. Other Plans and Projects

- 3.1 Regulation 105 of the 2017 Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 3.2 The purpose of the Great Yarmouth Borough-Wide Design Code (SPD) is to help implement the design-based policies of the Local Plan Part 1 Core Strategy and Local Plan Part 2. Regulations dictate that a SPD must not conflict with the development plan. The Supplementary Planning Document does not diverge from the design principles set out in the Local Plan Part 1 Core Strategy or Local Plan Part 2 but provides additional detail to aid their implementation.
- 3.3 The Local Plan Part 1 Core Strategy and Local Plan Part 2 was subject to a Habitat Regulations Assessment which concluded there would be likely significant effects on the above sites as a result of increased recreational impact associated with new development. To mitigate this, the assessment recommended the preparation and implementation a mitigation and monitoring strategy. This has now been implemented. The strategy involves all new residential and tourist development making a financial contribution towards the mitigation proposals detailed in the strategy.

4. Assessment of likely significant effects

- 4.1 The table below considers each section of the guidance in the Great Yarmouth Borough-Wide Design Code Supplementary Planning Document for potential likely significant effects on the above-mentioned designated sites.

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Introduction	This section provides introductory context only.	None	None	No
About Great Yarmouth Context	This section provides contextual information only.	None	None	No
Design vision for Great Yarmouth	This section consolidates a design vision for the design code which is consistent with achieving both natural and built environment objectives of the Local Plan Part 1 Core Strategy and Local Plan Part 2.	None	None	No
Borough-wide design requirements – Addressing climate change and conserving resources	This sub-section builds upon local plan policies CS1, CS9, CS12, CS13, CS16, A2 and E7. It provides detailed design guidance to help address climate change through design principles, mitigation and adaptation. No impact is considered likely.	None	None	No
Borough-wide design requirements – Context and identity	This sub-section builds upon local plan policies CS9, CS10, A2 and E5. It provides detailed design guidance to ensure developments respond to local context and strengthens local distinctiveness, setting out site analysis principles to guide an appropriate design response for development. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Borough-wide design requirements – Streets, movement and parking	This sub-section builds upon local plan policies CS9, GSP7, A2, and I1. It provides detailed design guidance for developments to prioritise the needs of walking and cycling whilst minimising the impact of necessary vehicle movement. No impact is considered likely.	None	None	No
Borough-wide design requirements – Public open space, nature and water	This sub-section builds upon local plan policies CS11, GSP6, A2, H4, and E4. It provides detailed design guidance to encourage development to provide good quality access to open space, nature and water and encourage on-site biodiversity. The guidance does not undermine the need for developments to undertake Habitat Regulation Assessment where appropriate. No impact is considered likely.	None	None	No
Borough-wide design requirements – Built form	This sub-section builds upon local plan policies CS1, CS9, A1, A2, and H3. It provides detailed design guidance to encourage sites to be developed effectively and in scale with its surroundings. No impact is considered likely.	None	None	No
Borough-wide design requirements – Building design	This sub-section builds upon local plan policies CS4, CS9, A1, A2 and E6. It provides detailed design guidance for specific buildings, predominantly focused on their visual appearance and function. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Area specific design requirements – Great Yarmouth, within the town walls	This sub-section provides guidance to aid the design of new development with the Great Yarmouth town centre area. It does not establish the principle of development, this being established through existing local plan policies and specifically policies GY1, GY2, GY3, GY4 and GY5. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	None
Area specific design requirements – Great Yarmouth seafront	This sub-section provides guidance to aid the design of new development within the Great Yarmouth seafront area. It does not establish the principle of development; this being established through existing local plan policies and specifically policies GY6 and GY7. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area specific design requirements – Gorleston town centre and historic core	This sub-section provides guidance to aid the design of new development within the Gorleston town centre area. It does not establish the principle of development; this being established through existing local plan policies and specifically policy R3. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Area specific design requirements – Gorleston seafront	This sub-section provides guidance to aid the design of new development within the Gorleston seafront area. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area specific design requirements – Great Yarmouth and Gorleston port and industrial areas	This sub-section provides guidance to aid the design of new development within the Great Yarmouth and Gorleston port and industrial areas. It does not establish the principle of development; this being established through existing local plan policies specifically policy GY10. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area specific design requirements – Caister-on-Sea village centre	This sub-section provides guidance to aid the design of new development within the Caister-on-Sea village centre. It does not establish the principle of development; this being established through existing local plan policies specifically policy R4. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Area type requirements – Terraced streets and squares	This sub-section provides guidance to aid the design of new development within the borough's terraced streets and squares areas. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area type requirements – Interwar housing estates	This sub-section provides guidance to aid the design of new development within the borough's existing interwar housing estates. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area type requirements – Post-war housing estates	This sub-section provides guidance to aid the design of new development within the borough's existing post-war housing estates. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Area type requirements – Historic village centres	This sub-section provides guidance to aid the design of new development within the borough's existing historic villages. It does not establish the principle of development; this being established through existing local plan policies and specifically policy R5. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area type requirements – Plotlands	This sub-section provides guidance to aid the design of new development within the borough's existing plotland areas. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Design requirements by development type – New housing developments	This sub-section provides detailed design guidance for new developments permitted within the borough. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Design requirements by	This sub-section provides detailed design guidance for infill development /	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
development type – Infill development/ redevelopment	redevelopment permitted within the borough. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.			
Design requirements by development type – New industrial, commercial and retail development	This sub-section provides detailed design guidance for new industrial, commercial and retail development permitted within the borough. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Design requirements by development type – Development in the rural area	This sub-section provides detailed design guidance for development in the rural area of the borough. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Design requirements by development type – Holiday parks	This sub-section provides detailed design guidance for holiday park development in the borough. It does not establish the principle of development; this being	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
	established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.			

5. Conclusions

- 5.1 The Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) sets out flexible and practical guidance to help shape placemaking across the borough. The SPD does not promote or support new development in addition or different to that which is already supported through existing policies in the Local Plan Part 1 Core Strategy and Local Plan Part 2. Rather, it provides detailed design guidance on how development should come forward in terms of layout, design, protection and enhancement of the natural, built and historic environment, and improving the health and well-being of communities. As such no likely significant effects on internationally designated habitat sites are considered to arise from the SPD as drafted alone or in combination with any other plans or strategies. The SPD has therefore been ‘screened out’ and no appropriate assessment is required.

Appendix 1: Sources of background information

Great Yarmouth Consolidated Local Plan (Local Plan Part 1 Core Strategy – Adopted 2015, Local Plan Part 2 – Adopted 2021) -

<https://storymaps.arcgis.com/stories/fa64b44d16b74a6b9173280f373c4b80>

Appendix 2: Designated Sites Considered

The table below provides details on the designated sites considered as part of this screening assessment. The table is adapted from the Habitats Regulations Assessment of the Great Yarmouth Local Plan Part 2 (Footprint Ecology, 2020).

Site	Reason for designation, trends in key species (where known)	Condition	Threats and Reasons for adverse condition	Notes / other issues
The Broads SAC, Broadlands SPA/Ramsar	Hard oligo-mesotrophic waters with Charophytes, natural eutrophic lakes with <i>Magnopotamium</i> or <i>Hydrocharition</i> type vegetation, transition mires and quaking bogs, calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caracion daravallianae</i> , alkaline fens and alluvial forests with <i>Alnus glutinosus</i> and <i>Fraxinus excelsior</i> , <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils. Desmoulin's whorl snail <i>Vertigo moulinsiana</i> , otter <i>Lutra lutra</i> and fen orchid <i>Liparis loeselii</i> . Breeding bittern and marsh harrier (both increasing), wintering hen harrier, Bewick's and whooper swan (no trends available) and wigeon (stable) shoveler (declining) and gadwall (stable).		Management neglect and succession, water abstraction, drainage, sea level rise and saline incursions. Sewage discharges and agricultural runoff. Tourism and recreation	Calcareous fens in support Annex II fen orchid <i>Liparis loeselii</i>
Relevant component SSSIs				
Burgh Common & Muckfleet Marshes	Floristically-rich fen meadows, tall fen vegetation and drainage dykes.	22 % favourable; 29 % unfavourable recovering; 49 % unfavourable no change.	Water pollution - agriculture/run off	Likely to be affected by upstream abstraction issues.
Hall Farm Fen, Hemsby	Floristically rich unimproved fen grassland with dykes unusual in supporting both acidic and calcareous plant communities.	100 % unfavourable no change.	Water abstraction.	Water abstraction likely to be affecting this site.
Trinity Broads	Shallow, inter-connected lakes with fringing reedswamp, wet carr woodland and fen.	29 % favourable; 36 % unfavourable recovering; 36 % unfavourable no change.	Inappropriate scrub control. Water abstraction. Water pollution - agriculture/run off. Water pollution – discharge.	
Shallam Dyke Marshes, Thurne	Grazing marsh and clearwater drainage dykes.	1 % favourable; 3 % unfavourable recovering; 79 % unfavourable no change; 17 % unfavourable declining.	Drainage, Inland flood defence works, Water pollution - agriculture/run off	

Site	Reason for designation, trends in key species (where known)	Condition	Threats and Reasons for adverse condition	Notes / other issues
Upper Thurne Broads & Marshes	Open water and marginal reedswamp, species rich mixed and <i>Cladium</i> fen, base-poor seepage community, grazing marsh, alder carr. Marsh harrier and bittern	40 % favourable; 2 % unfavourable recovering; 47 % unfavourable no change; 11 % unfavourable declining.	Water pollution - agriculture/run off. Drainage. Inappropriate css/esa prescription. Agriculture – other. Siltation.	
Winterton-Horsey Dunes SAC, Great Yarmouth North Denes SPA	Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>), Humid dune slacks, Embryonic shifting dunes, Shifting dunes along shoreline with <i>Ammophila arenaria</i> . Breeding little tern (variable numbers between years).		Declines in management, water abstraction, land drainage, scrub encroachment.	
Relevant component SSSIs				
Great Yarmouth North Denes	Full successional sequence of vegetation from pioneer to mature types; foredune, mobile dune, semi-fixed dune and dry acid dune grassland, accreting ness (promontory) Largest UK breeding colony of little tern on the foreshore.	100 % favourable.		
Winterton-Horsey Dunes	An extensive dune supporting well developed dune heath, slacks and dune grassland. Little terns breed on the foreshore.	30 % favourable; 56 % unfavourable recovering; 14 % unfavourable no change.	Inappropriate coastal management	
Breydon Water SPA/Ramsar	Breeding common tern <i>Sterna hirundo</i> (no trends available), wintering Bewick's swan (declining), avocet <i>Recurvirostra avosetta</i> (stable) and golden plover <i>Pluvialis apricaria</i> (stable), ruff <i>Philomachus pugnax</i> , wintering Lapwing <i>Vanellus vanellus</i> (SPA) (stable). At least 20,000 wintering waterfowl		Sea-level rise, recreational disturbance	
Relevant component SSSIs				
Breydon Water	The only intertidal flats occurring on the east coast of Norfolk attracting large numbers of wildfowl and waders on passage and during the winter months.	100 % favourable.		
Halvergate Marshes	Halvergate Marshes support wintering waterfowl including Bewick's swan, lapwing and golden plover.	32 % favourable; 44 % unfavourable recovering; 24 % unfavourable no change.	Inappropriate weed control. Inappropriate css/esa prescription. Inappropriate cutting/mowing. Water abstraction.	

Site	Reason for designation, trends in key species (where known)	Condition	Threats and Reasons for adverse condition	Notes / other issues
			Inappropriate ditch management	

Great Yarmouth Borough-Wide Design Code

SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Strategic Environmental Assessment (SEA)

Screening Report

July 2024



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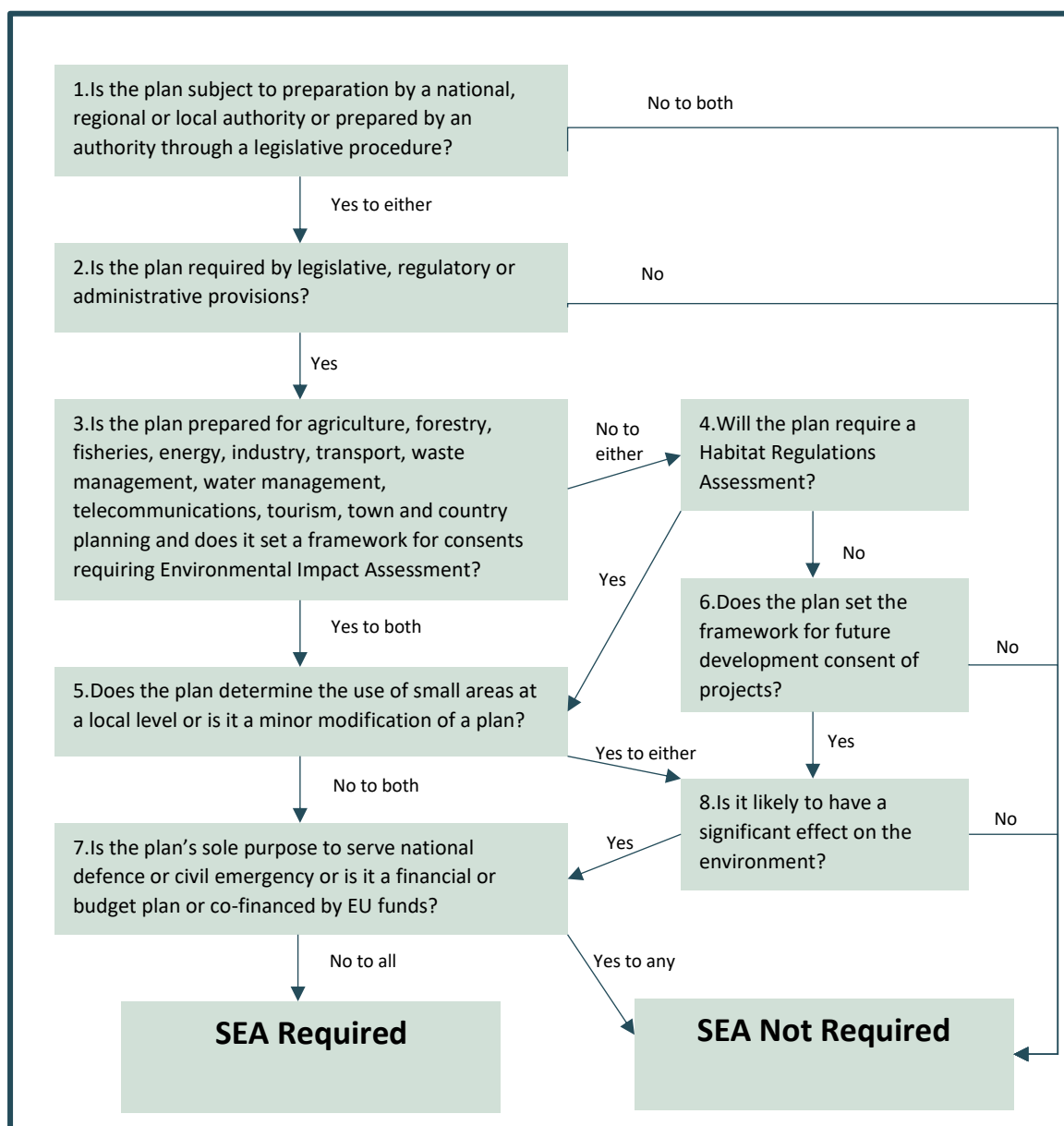
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1. Introduction

- 1.1 The Environmental Assessment of Plans and Programmes Regulations (2004) requires plans (including Supplementary Planning Documents) which are likely to have an effect on the environment to be subject to a Strategic Environmental Assessment (SEA).
- 1.2 In some circumstances a Supplementary Planning Document (SPD) could have significant environmental effects and may fall within the scope of the regulations and so require Strategic Environmental Assessment.
- 1.3 This screening report is designed to test whether or not the contents of the Great Yarmouth Borough-Wide Design Code SPD requires a full Strategic Environmental Assessment. The Screening Report was subject to consultation alongside the final draft SPD. Natural England supported the conclusions of the screening report and its findings. No other comments were made on the report.
- 1.4 The screening assessment is presented in two parts. The first part assesses whether the SPD constitutes a 'plan or programme' that requires SEA under the Regulations (see Figure 1). The second part of the assessment considers whether the SPD is likely to have a significant effect upon the environment (Stage 8, in Figure 1), using criteria drawn from Schedule 1 of the Regulations. Schedule 1 of the Regulations sets out the following criterion for considering likely significant effects:
 1. The characteristics of plans and programmes, having regard, in particular, to:
 - a. the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
 - b. the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
 - c. the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
 - d. environmental problems relevant to the plan or programme; and
 - e. the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).
 2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—
 - a. the probability, duration, frequency and reversibility of the effects;
 - b. the cumulative nature of the effects;
 - c. the transboundary nature of the effects;
 - d. the risks to human health or the environment (for example, due to accidents);
 - e. the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
 - f. the value and vulnerability of the area likely to be affected due to—
 - i. special natural characteristics or cultural heritage;
 - ii. exceeded environmental quality standards or limit values; or
 - iii. intensive land-use; and

- g. the effects on areas or landscapes which have a recognised national, Community or international protection status.

Figure 1 - Application of SEA to plans



2. Screening Assessment

- 2.1 Table 1 below outlines the responses to the questions posed in Figure 1 in relation to the Great Yarmouth Borough-Wide Design Code SPD.

Table 1 - SEA Criterion Screening

SEA Criterion	Yes/No	Explanation
1. Is the SPD subject to preparation and/or adoption by a national, regional or local authority	Yes	The preparation and adoption of the SPD is undertaken by the Council as the local planning authority, in accordance with the

SEA Criterion	Yes/No	Explanation
<p>OR</p> <p>prepared by an authority for adoption through a legislative procedure by Parliament or Government?</p> <p>(Article 2(a))</p>		<p>Town and Country Planning (Local Planning) Regulations 2012.</p> <p>GO TO STAGE 2</p>
<p>2. Is the SPD required by legislative, regulatory or administrative provisions?</p> <p>(Article 2(a))</p>	Yes	<p>The SPD is not a requirement and is optional under the provisions of the Town and Country Planning Act and the regulations. However, if adopted its guidance will supplement and help implement Local Plan policies.</p> <p>GO TO STAGE 3</p>
<p>3. Is the SPD prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use</p> <p>AND</p> <p>does it set a framework for future development consent of projects in Annexes I and II of the EIA Directive?</p> <p>(Article 3.2 (a))</p>	<p>Yes</p> <p>No</p>	<p>The SPD has been prepared for the purposes of town and country planning. It supports the Great Yarmouth Local Plan and will be a material consideration in the determination of relevant planning applications.</p> <p>The SPD only provides detailed design guidance to help support and implement the Strategic Objectives of the Local Plan where this concerns achieving high quality design. This includes supporting the implementation of policies CS1, CS4, CS9, CS10, CS11, CS12, CS13, CS16, CS17, CS18 of the Local Plan Part 1 (Core Strategy) and policies GSP6, GSP7, GY1, GY2, GY3, GY4, GY5, GY6, GY7, GY10, A1, A2, H3, H4, H8, H9, H10, H11, B1, L1, L2, E4, E5, E6, E7, I1 of the Local Plan Part 2.</p> <p>The Local Plan provides the main framework for future development consent of project which may require Environmental Impact Assessment.</p> <p>GO TO STAGE 4</p>
<p>4. Will the SPD, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?</p> <p>(Article 3 (2)(b))</p>	No	<p>This has been screened separately. See the Habitat Regulations Assessment (HRA) Screening Report of the SPD.</p> <p>GO TO STAGE 6</p>

SEA Criterion	Yes/No	Explanation
5. Does the SPD determine the use of small areas at local level OR is it a minor modification of a plan or programme (Article 3 (3))	N/A	N/A
6. Does the SPD set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Article 3(4))	N/A	The SPD will be a material consideration in the determination of planning applications for development within the local planning authority area. GO TO STAGE 8
7. Is the SPDs sole purpose to serve national defence or civil emergency OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7 OR Is it a financial or budget PP? (Article 3.8-3.9)	N/A	N/A
8. Is the SPD likely to have a significant effect on the environment? (Article(3.5))	No	See the following section summarising the reasoning / justification for this decision.
Conclusion The Regulations do not require a SEA for the Great Yarmouth Borough-Wide Design Code SPD.		

- 2.2 Table 2 below assesses the likelihood of significant effects arising from the SPD as per criterion 8 above.

Criteria for determining Likely Significant Effect (Schedule 1)	Assessment
1. The characteristics of plans and programmes, having regard, in particular, to:	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>The SPD, once adopted, would be a material consideration in the determination of planning applications for development within the local planning authority area of Great Yarmouth.</p> <p>The overarching design framework is set by the Local Plan, and as such will provide the direct</p>

	detail for future development. The SPD does not allocate resources, but helps to guide the design of local developments that are localised in nature with the promotion of healthy environments.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The SPD conforms with the NPPF, NPPG, and provides more detailed guidance in relation to the design policies in the Great Yarmouth Local Plan Core Strategy and LPP2. Whilst there are other SPDs that cover other localised design guidance, this SPD is intended to sit alongside and complement them. Therefore, it will not significantly influence other plans or programmes.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The SPD encourages enhancement and preservation of the environment, with an emphasis on green infrastructure, addressing climate change and use of efficient energy and materials. It also strongly encourages sustainable place development in line with the NPPF to prevent needless waste and increase sustainable patterns of movement. The SPD therefore supports sustainable development.
(d) environmental problems relevant to the plan or programme;	One of borough's key environmental problems is flood risk, which the SPD helps to address by encouraging sustainable development for future flood resilience and to help implement SUDs into developments. The SPD also considers the future impact of climate change and promotes more sustainable patterns of movements across the borough, reducing increases in carbon and greenhouse gas emissions.
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	No impact. The SPD is not directly relevant to the implementation of European legislation.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
(a) the probability, duration, frequency and reversibility of the effects;	The SPD aims to encourage high quality design development. Development will therefore be expected to follow the Design Code to be appropriately designed, considering impacts on amenity, character, environment, heritage etc. This will result in positive effects across the built and natural environment.
(b) the cumulative nature of the effects;	The SPD conforms to related strategic policies and it is intended that the effects will have a positive cumulative benefit for the borough.

(c) the transboundary nature of the effects;	No impacts. No transboundary effects (i.e. no other EU Member States) are anticipated.
(d) the risks to human health or the environment (for example, due to accidents);	It is not considered that the SPD would present a risk to human health. The SPD is expected to have a positive impact by promoting and maintaining green infrastructure, place attachment, wellbeing and increasing adaptation to climate change.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The magnitude and spatial extent of any effects is not expected to be significant because of the localised nature. The effects of the SPD will be at the borough-wide scale and lower.
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use.	Sites are assessed against relevant local plan policies. The SPD will not set policy related to specific land use and will not influence the principle of development, but instead will be a guide to developers for infrastructure and design techniques. This includes preserving cultural heritage.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	The SPD will help to harmonise new development where these potentially interface with the Broads Executive Area.

3. Conclusions

- 3.1 The Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) is in accordance with the Council's Local Plan Core Strategy and LPP2 which have been subject to a full Strategic Environmental Assessment. The SPD sets out flexible and practical guidance to help shape placemaking across the borough. The design code has potential to provide multiple benefits such as encouraging the preservation and enhancement of the built and natural environments, as well as improving the health and well-being of communities.
- 3.2 Given the above the SPD will not have any significant effects on the environment and therefore a full Strategic Environmental Assessment is not required.

CABINET



URN:	23-204
Report Title	Adoption of Local Development Scheme
Report to:	Cabinet
Date of meeting:	29 January 2024
Responsible Cabinet Member:	Cllr Daniel Candon
Responsible Officer:	Sam Hubbard, Strategic Planning Manager
Is this a Key decision ?	Yes
Date added to Forward Plan of Key Decisions if a Key Decision:	8 December 2023

EXECUTIVE SUMMARY

This report recommends the adoption of a revised Local Development Scheme which sets out the subject matter of Local Plan documents and timescales for preparation.

RECOMMENDATIONS:

That Cabinet:

- 1) Adopt the revised Local Development Scheme (Appendix 1)
- 2) Delegate authority to the Head of Planning, in consultation with the Cabinet Member for Strategic Planning, to adopt any future revisions to the Local Development Scheme where they relate to changes to the timetable of preparation or minor changes to subject matter of the Local Plan with the following exceptions:
 - The submission of the Local Plan under regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 shall not exceed June 2025; and
 - The adoption of the Local Plan under section 23 of the Planning and Compulsory Purchase Act 2004 shall not exceed December 2026.

1. Revised Local Development Scheme

- 1.1. The Council's Local Development Scheme (LDS) sets out the timetable for the preparation of the Local Plan. It must also set out the subject matter and geographical area which the plan will cover. It was last adopted in May 2022.

- 1.2. Local Plans must be prepared in accordance with the LDS, as such it is important to keep it up to date. An up-to-date LDS is a useful source of information for the public and stakeholders so they can keep track of progress and understand when they are likely to next be consulted.
- 1.3. The current LDS sets out a proposal to prepare a single Local Plan for the Local Planning Authority area of Great Yarmouth Brough Council (i.e. excluding the Broads Authority area). The LDS states that the new Local Plan will include a strategy for development, identify site allocations and area specific policies alongside detailed policies to help determine planning applications.
- 1.4. A revised LDS is presented in Appendix 1 to this report and provides the latest timetable for preparation of the plan. There has been some slippage in terms of timescales from the current LDS due to delays in some evidence base production and resourcing across the planning service. However, the Local Plan is still planned to be adopted in early 2026 and importantly within 5 years of the adoption of the Local Plan Part 2 which ensures our Local Plan remains 'up-to-date' for the purposes of national planning policy and therefore can continue to be afforded full weight in light of the presumption in favour of sustainable development. Additionally, the revised LDS proposes a consultation focussed on Gypsy and Traveller provision in June/July 2024 as evidence of Gypsy and Traveller accommodation needs will not be ready in time for the First Draft Local Plan consultation planned for March 2024. The findings of this consultation will be considered alongside the findings of the First Draft Local Plan consultation.
- 1.5. Rather than a static PDF document, it is proposed that the LDS will be presented as a HTML document on the Council's website, which will ensure it is fully accessible to all of our community and stakeholders.
- 1.6. The timetable will need to be kept under review, and it is likely that further changes to milestones will be required, either due to ongoing planning reform and changes to national planning policy or as a result of issues raised in responses during consultations. In order to be able to keep the LDS up-to-date more responsively, it is requested that delegated authority is given to the Head of Planning in consultation with the Cabinet Member for Strategic Planning to make amendments to the timetable and minor changes to the subject matter of the plan as described in the LDS.
- 1.7. Whether something is a minor change to the subject matter will relate to whether it changes the substance of what the plan is seeking to include. For instance, changes in terminology to reflect changes in national planning policy would be covered by the delegation. However, the introduction or deletion of an item of content, such as the inclusion or removal of detailed policies, would not be done under delegated authority. Each time the Cabinet Member for Strategic Planning is consulted on any proposed amendments, officers shall set an assessment of the proposed changes and the reasoning for the proposed changes.
- 1.8. The Levelling Up and Regeneration Act 2023 sets out a framework for a revised Local Plans system. Current proposals for the transition to this indicate that plans currently under preparation have to be submitted by 30th June 2025 and have to be adopted by 31st December 2026. Failure to meet these deadlines will mean that the Council has to prepare a plan under the new system which could result in starting from the beginning which would result in additional costs. It would also result in the existing plan going out of date before the new plan is in place. As such if there are any delays to the timetable which would result

in these deadlines being missed, these will not be covered by the delegation and in this instance a revised LDS will be reported to Cabinet for consideration.

- 1.9. A record of any agreement to a variation under the delegation will be recorded and published on the register of delegated decisions.

2. Financial Implications

- 2.1 There might be limited financial implications in regard to the timing of works such as the commissioning of evidence to support the plan that would impact on the financial year within which the spend would be realised. However, this would not have wider implications on the Council's financial planning as the preparation of the Local Plan, and other documents, is provided for in the agreed Strategic Planning budget.

3. Legal and Risk Implications

- 3.1. Preparation of the Local Development Scheme is a requirement of the Planning and Compulsory Purchase Act 2004 (as amended). Section 19(1) of the Act requires Development Plan Documents (the Local Plan) to be in accordance with the Local Development Scheme. Therefore, it is important that the Local Development Scheme is up to date with respect to both the description of the plan and the timetable for its production.

4. Conclusion

- 4.1 It is recommended that Cabinet:
- a) Adopt the revised Local Development Scheme (Appendix 1)
 - b) Delegate authority to the Head of Planning, in consultation with the Cabinet Member for Strategic Planning, to adopt any future revisions to the Local Development Scheme where they relate to changes to the timetable of preparation or minor changes to subject matter of the Local Plan with the following exceptions:
 - i. The submission of the Local Plan under regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 shall not exceed June 2025; and
 - ii. The adoption of the Local Plan under Section 23 of the Planning and Compulsory Purchase Act 2004 shall not exceed December 2026.

5. Appendices

- 5.1 Appendix 1 – Local Development Scheme

Consultations	Comment
Monitoring Officer Consultation:	
Section 151 Officer Consultation:	Through ELT
Existing Council Policies:	n/a
Equality Issues/EQIA assessment:	n/a

Appendix 1

(Proposed HTML document - Text to be added to GYBC website)

Local Development Scheme (Adopted January 2023)

This Local Development Scheme sets out Great Yarmouth Borough Council's intended programme of formal Local Plan preparation. The Council's plans cover the whole of the Borough except those parts lying within the Broads area (where the Broads Authority are the Local planning Authority and prepare a Local Plan).

It should be appreciated that the formal Local Plan documents which this scheme covers are only part of the forward planning work undertaken by the Council. Other work includes cooperation with other public organisations (including joint non-statutory plans and research); project work to facilitate developments or environmental improvements; preparation of supplementary planning documents and guidance; and advice and support to communities preparing neighbourhood plans.

The Council will keep the progress against the intentions indicated in this Local Development Scheme under review and report this in its Annual Monitoring Report. The Council may revise this Local Development Scheme if required to reflect any changes in either the documents to be produced, or the anticipated timetable for their production. These could be affected by, for example, changes in the planning system, resource constraints, or unforeseen issues.

Current Local Plan Documents

The following documents comprise the current development plan for the local planning authority of Great Yarmouth Borough Council.

- [Great Yarmouth Local Plan Core Strategy \(Local Plan Part 1\) \(adopted December 2015\)](#)
- [Great Yarmouth Local Plan Part 2 \(adopted December 2021\)](#)
- [Minerals and Waste Local Plans \(produced by Norfolk County Council\)](#)

Proposed Local Plan Documents

New Local Plan (covering period to 2041)

Subject Matter:

This plan will replace the current (2013-2030) Local Plan which is made up of the Core Strategy (Local Plan Part 1) and the Local Plan Part 2. It is intended the new Local Plan will be a single document.

The period covered by the new plan is anticipated to cover the period to 2041 to ensure a 15-year coverage of strategic policies on adoption in line with the National Planning Policy

Framework.

The Local Plan will cover the entire Borough except those areas covered by the Broads Authority.

The plan will include a strategy for development, including identifying needs for housing and economic development. The plan will identify land for development and other site and area specific strategic and non-strategic policies. The plan will include detailed strategic policies and non-strategic policies to help determine planning applications.

Timetable:

1. Preparation of evidence and call for sites: *Completed - Autumn 2021-Summer 2022.*

This stage involved collation of key evidence to inform the Local Plan such as a housing needs assessment, employment land needs assessment, and sustainability evidence. It also involved a 'call for sites' where members of the public, landowners, developers, parish councils, community groups, and other stakeholders suggested sites for potential future development or protection through Local Green Space designation. Consultation at this stage formed part of the engagement required under regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.

2. Options Consultation: *Completed – January/February 2023 :*

This stage involved a consultation on the key issues the Local Plan will need to address. It also involved consultation on all the site ideas suggested through the call for sites process. Consultation at this stage will form part of the engagement required under regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.

3. First Draft Local Plan Consultation: *March/April 2024:*

This stage will involve consultation on a first draft of the Local Plan. The first draft plan will set out the Council's preferred strategy, policies and site allocations with the exception of Gypsy and Traveller accommodation policies and site allocations. Consultation at this stage will form part of the engagement required under regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.

4.Gypsy and Traveller Accommodation Consultation: *June/July 2024*

This stage will involve a consultation on the Council's preferred policy approach for Gypsy and Traveller accommodation provision.

5.Final Draft Local Plan publication: *October/November 2024:*

This stage will be the final opportunity for stakeholders to make comments on the plan before it is submitted for examination by a Planning Inspector appointed by the Secretary of State. This stage covers the requirements under regulation 19 and 20 of the Town and Country Planning (Local Planning) Regulations 2012.

6. Submission of Final Draft Local Plan for Examination: *December 2024:*

At this stage the plan is submitted for examination by a Planning Inspector appointed by the Secretary of State alongside the comments received at the Final Draft stage. This stage covers the requirements under regulation 22 of the Town and Country Planning (Local

Planning) Regulations
2012.

7. Examination: *December 2024 – December 2025:*

The examination will likely involve public hearings and a further consultation on any modifications the Inspector deems necessary to the plan. This stage covers the requirements under regulation 23, 24 and 25 of the Town and Country Planning (Local Planning) Regulations 2012.

8. Adoption: *January 2026:*

Following examination of the plan the Council will be able to formally adopt the plan. This stage covers the requirements under regulation 26 of the Town and Country Planning (Local Planning) Regulations 2012.



GREAT YARMOUTH
BOROUGH COUNCIL

Great Yarmouth Design Code

Supplementary Planning
Document

Adopted January 2024

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1. Introduction

1.1 Scope and purpose of the Design Code

The Great Yarmouth Design Code is a tool to help shape great placemaking in the borough. It applies to all scales and forms of development within the borough (aside from areas where the Broads Authority is the Local Planning Authority), including householder applications, small sites, major developments, and regeneration sites.

It is a tool to assist in meeting the Strategic Objectives of the Adopted Local Plan¹, which include designing local environments to be high quality and more resilient to a changing climate; and enhancing the quality of the borough's building environment by improving the character of its townscapes and promoting local distinctiveness. The Design Code is intended to inspire higher standards of design across the borough, creating better places for generations to come. It is also intended to ensure more certainty, consistency and speed in the determination of planning applications at all scales, making the planning process more effective at delivering new development that meets the needs of the local area.

The Design Code is intended to set out clear principles and standards for how development should be designed in the borough, focusing on the priority aspects of design. It is a concise code that signposts users to other sources of regulation, guidance, assessment tools and best practice. It is not an exhaustive design manual for every detail and is not a substitute for commissioning suitably qualified and experienced professional designers and consultants to prepare proposals and the supporting technical information required.

The Design Code should be read in conjunction with the National Design Guide and the National Model Design Code, which give useful further guidance.

1.2 Status of the Design Code

The Great Yarmouth Design Code has been adopted as a Supplementary Planning Document and has material weight in the assessment of planning applications by the Borough Council as the Local Planning Authority, as well as in appeals. Following the passing of the Levelling Up and Regeneration Act 2023, the Design Code may be incorporated into the new Local Plan, or be adopted as a Supplementary Plan.

For areas where a Neighbourhood Plan has been made, this may include design policies and/or a neighbourhood design code. At the current time, a made Neighbourhood Plan will take precedence over this Design Code, should there be a conflict.

1.3 Who should use the Design Code

Users of the Design Code are all those involved with, and with an interest in, the development of the built environment in the borough. This includes and is not limited to:

- Planning officers
- Elected members and Planning Committee
- Statutory consultees

1 <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan>

- Local interest groups
- Community members
- Parish Councils
- Property owners
- Architects and designers
- Developers
- Planning agents

1.4 Structure of the Design Code

The Design Code is structured in four parts:

About Great Yarmouth: this section summarises what is distinctive about the landscape and built character of the borough. It is intended as a broad overview which signposts users to more detailed sources of information and character analysis.

Borough wide design requirements: these summarise design standards that apply across the whole borough area, where relevant to the type of development. These are organised thematically and are aligned to the structure of the National Model Design Code.

Area specific design requirements: these set out the design requirements and priorities that apply to character areas and character types found in the borough. Character areas are geographically specific locations in the borough, while character types describe patterns of existing development or settlement types, that can be found in a range of locations.

Development type design requirements: these set out requirements that are specific to different types of development proposal.

Required, expected and best practice code elements

Within the SPD design requirements are set out for specific types of development proposal. These are categorised as: 'Required'; 'Expected'; and 'Best Practice'. These seek to provide additional detail on how to comply with the policies set out in the Local Plan. They do not introduce new policy, but provide a practical guide to what would be considered to constitute policy compliance.

Applicants will be expected to demonstrate that proposals are designed in compliance with the requirements set out. As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal and in some cases, applicants may demonstrate that it would be unfeasible, or unviable to be fully policy compliant in every detail, or that betterment can be achieved via a different approach. However, the onus is on applicants to justify their approach in these cases.

All 'required' standards are based on national or local policy requirements. All development should comply with these required standards, unless there are strong planning reasons to justify an alternative approach. These 'required' elements carry the most weight in the assessment of the planning balance.

All 'expected' standards are recognised approaches to meeting the expectations of policy. Other ways of demonstrating compliance may be acceptable, but will need to be assessed on a case by case basis.

The code also includes recommendations that are intended to assist applicants in preparing the best possible design proposals. These represent best practice above and beyond mandatory requirements and policy. We hope that applicants will take the opportunity to use these recommendations to improve their proposals, in order to sustain, enhance and improve the distinctive character of Great Yarmouth.

1.5 How to use the Design Code

Design Code users should use the design code to identify the code requirements that are applicable to the specific proposal under consideration. Not all code requirements will apply to all proposals. Follow the steps below to identify the relevant aspects of the code for your proposal:

- Identify relevant planning policy and existing guidance/SPDs that are relevant to the proposal
- Identify borough wide requirements that are relevant to the proposal (and refer to relevant standards)
- Identify which character area(s) are relevant to the site, and apply the design objectives for those area types
- Identify what type of development is being proposed, and apply the related design code requirements

1.6 How the Design Code has been developed

The Design Code has been developed through extensive consultation and engagement with statutory bodies, stakeholders and representatives of the local community, and in line with the National Model Design Code and National Design Guide. It follows the approach set out in national guidance to be locally specific and relevant in terms of the level of analysis and the focus of the Design Code.

A steering group including representatives from Norfolk County Council including Highways, the LLFA, and tree officers, along with Great Yarmouth Borough Council planning and conservation officers, and Historic England, have guided the process. The content of the design code reflects the input of these stakeholders and represents agreed approaches to designing high quality buildings, streets, spaces and developments of all kinds.

Engagement at the drafting stage took place with parish and ward councillors, applicants and agents from the development sector, the Great Yarmouth Civic Society, and other stakeholders including Natural England, the Environment Agency, and Active Norfolk. Full public and statutory consultation took place on the draft Design Code in 2023, following which amendments were made in response to comments received.

2. About Great Yarmouth

The borough of Great Yarmouth includes Great Yarmouth itself, the town of Gorleston-on-Sea on the other bank of the Yare, and the villages surrounding them to the north, west and south. The borough was formed in 1974, as a merger of the former county borough of Great Yarmouth, along with part of Blofield and Flegg Rural District, and also part of the Lothingland Rural District in East Suffolk. It is fringed by, and partly includes, the Broads and part of the borough falls within the area for which the Broads Authority is the Local Planning Authority (LPA).

2.1 Landscape character, coastal change and flood risk

The character of the borough derives from its landscape, underlying geology and human history which has significantly shaped the landscape as well as creating the distinctive built identity of its towns and villages. A range of documents should be consulted to understand the landscape context for development proposals in the borough, including:

- Landscape Character Assessment (2008)¹
- Settlement Fringe Landscape Sensitivity Study (2016)²

The borough includes a number of important landscape and green infrastructure designations. Aside from the Broads area, for which the Broads Authority is the LPA, these include:

- The Norfolk Coasts Area of Outstanding Natural Beauty (AONB)
- A number of Sites of Special Scientific Interest (SSSI)
- Local Wildlife Sites, Ancient Woodland and other designations.

The relevant policy and guidance should be consulted and followed for sites which lie within, or will affect, these designated areas.

The borough includes areas of coastline subject to change, as well as areas within both tidal and fluvial flood risk zones. Areas of the borough are also sensitive to surface water flooding. The following should be consulted to understand how coastal change and flood risk is present in the borough:

- Shoreline Management Plan (2012)³
- Surface Water Management Plan (2013)⁴
- Strategic Flood Risk Assessment Level 1 Report (2017)⁵

1 https://www.great-yarmouth.gov.uk/media/1236/Landscape-Character-Assessment/pdf/Landscape_Character_Assessment.pdf?m=635720551564970000

2 https://www.great-yarmouth.gov.uk/media/4673/Settlement-Fringe-Study-2016/pdf/Settlement_Fringe_Study_2016.pdf?m=637026942736470000

3 <https://www.great-yarmouth.gov.uk/article/9790/Shoreline-management-plan-2012>

4 https://www.great-yarmouth.gov.uk/media/1242/Surface-Water-Management-Plan/pdf/Surface_Water_Managment_Plan.pdf?m=637750991190230000

5 The full suite of Strategic Flood Risk Assessment Documents can be found on the Environmental Evidence webpage for the Great Yarmouth Local Plan, https://www.great-yarmouth.gov.uk/article/2506/Environmental-evidence#_content_

Great Yarmouth, as the main town in the borough, developed in three distinct areas - the medieval town - for a short period, a more prosperous mercantile centre than Norwich - within the walls, the 19th century expansion as a seaside resort coupled with its continuing importance for fishing and fish processing, and the 20th century expansion with estate housing development after WW1 and continuing after WW2 and to the present day. Great Yarmouth Market is one of the largest historic market-places in Britain, a market is presumed to have existed at Great Yarmouth long before the granting of King John's charter of 18 March 1207-1208.

Until the 19th century, building was only permitted within the Medieval town walls. The limited space dictated that houses were built as closely together as possible, which led to the development of The Rows. Unique to Great Yarmouth, the Rows were a network of 145 very narrow streets which ran parallel to each other. They were so narrow that a special 'Troll Cart' was developed to transport goods along them. The Rows took up most of the land inside the town walls. At first both rich and poor people lived there together. The wealthier people gradually moved out, and their houses were divided up into smaller properties. This left a diverse range of architecture. Grand merchant houses stood next to tiny dwellings which were built back-to-back with the houses in the next row.



fadensmapofnorfolk.co.uk/

Gorleston has its origins as a fishing village, then as a seaside resort which expanded substantially only in the 20th century. Due to the natural limitations on the growth of Great Yarmouth itself, due to the river and the sea, Gorleston's suburbs were developed to meet the need for a large amount of new housing after WW2, and growth continues to take place around it.

The villages have predominantly medieval origins, with fishing along the coast and agricultural estates inland. The 20th century also saw substantial growth around many villages in coastal locations with rail links bringing holiday-makers to the area, as well as from 'plotlands' on poor and marginal land along the coastal cliffs and dunes. Inland villages have seen little change or growth, apart from Bradwell, which developed substantially and is now part of the continuous urban area of Gorleston, and Caister and Belton, both of which have seen significant housing development through the postwar period to the present day.

2.3 Local building materials

Flint is the most common historic building material due to being naturally found in the borough, unlike other forms of building stone. Due to a lack of timber on the Breckland sand and gravel plain, which is the predominant underlying geology of the area, medieval timber-framed buildings are relatively rare compared to other parts of East Anglia, but some later timber-framed and timber-clad vernacular buildings are found in villages and the rural area.

With red brick, flint is the most prevalent cladding material found in pre-20th century buildings across the borough. A wide variety of flintwork techniques, including knapped, galleting and flushwork, can be found across the borough. Local brickworks produced mainly a soft orange-red brick, and, with the use of flint, this creates the distinctive material character of most of the older parts of Great Yarmouth's settlements. Later brickwork included ornamental moulded and decorative bricks which were often also made locally. Brick and flint were frequently combined with brickwork used to create corners and openings for windows and doors, and flint used to infill.

Painted brick, and render, is not as commonly seen today as exposed brick or flint, due in part to the erosion of historic lime renders, but was relatively frequently used. Historically, many brick and/or flint buildings would have been rendered - unless decorative flint or brickwork was meant to be exposed - to protect the rubble core of the flint walls as well as the soft Norfolk brick. Painted and rendered elevations are mostly found on some, mostly smaller, historic timber-framed buildings and small-scale brick buildings particularly in High Street locations. Painted façades can also be found on brick buildings which were overpainted or rendered in the late 18th and 19th century as part of restyling them to a more neoclassical appearance and this was often applied only to frontages.

In many locations the choice of paint as a finish was determined by weathering characteristics, with black tar paint on north- or west-facing elevations due to the prevailing wind exposure and risk of damp, or seaward elevations in coastal locations, as a protective coating. South- and street-facing elevations were typically limewashed in white or other colours which were determined through locally available natural pigments

Timber weatherboarding can be found in rural areas, particularly on agricultural buildings, but is relatively infrequent, and has since the 19th century been typically painted with tar for improved weathering in the same way as the painting of brick buildings, with limewash - both white and coloured - on less exposed elevations. Pantiled roofs - which have a

Dutch origin - are typical for vernacular buildings, in both red and black glazed forms, while reed thatch was highly prevalent historically, due to the Broads reedbeds, but was largely replaced with hard roof coverings during the 19th and 20th centuries. Plain tile also found, and slate became common after the coming of the railways meant that importing Welsh slate became economic.

2.4 Heritage designations and assets

The borough includes a wide range of heritage assets, many of national significance. The borough includes 431 listed buildings, 9 are considered to be at risk, 14 Scheduled Ancient Monuments and 18 Conservation Areas. These heritage assets can be enhanced by development within their settings, but can also be harmed by inappropriate design.

These are highlighted, where relevant, in character area descriptions and the relevant guidance and information should be consulted such as the Historic England listing entry, for listed buildings, scheduled ancient monuments and historic parks and gardens.

Conservation Area Appraisals are in the process of being prepared for the borough's Conservation Areas. When published and/or adopted, these should also be considered as part of the informing process for future planning applications within those specific areas.

Heritage resources should be consulted as part of understanding the context and local identity of sites for development proposals affecting designated heritage assets. These include:

- Norfolk Historic Environment Record⁶ and the Norfolk Heritage Explorer⁷
- Norfolk Record Office⁸

There is also substantial and important archaeology below ground in the borough, and Norfolk County Council's archaeological team may be consulted as part of the planning process.

6 <https://www.norfolk.gov.uk/libraries-local-history-and-archives/archaeology-and-historic-environment/historic-environment-record>

7 <https://www.heritage.norfolk.gov.uk/>

8 <https://www.archives.norfolk.gov.uk/>



Fig. 2. Snapshots of Great Yarmouth's distinctive landscapes

Top: Views looking south and north along the river Yare from the centre of Great Yarmouth.

Second row: The Gorleston-on-sea river frontage, and the town centre seen from the seafront

Third row: The village green at Martham, and the wide landscapes of the rural parts of the borough

Bottom: The old fishing village of Caister-on-Sea and the plotlands on the clifftop at Scrabby.



Fig. 3. Examples of typical building materials and details for the Great Yarmouth area.

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Fig. 4. 1797 Faden map, current boundary of Great Yarmouth borough indicated in red. The map can be further explored at <http://www.fadensmapofnorfolk.co.uk/>



Fig. 5. Ordnance Survey map from 1888. This map can be further explored via the National Library of Scotland website, <https://maps.nls.uk/>

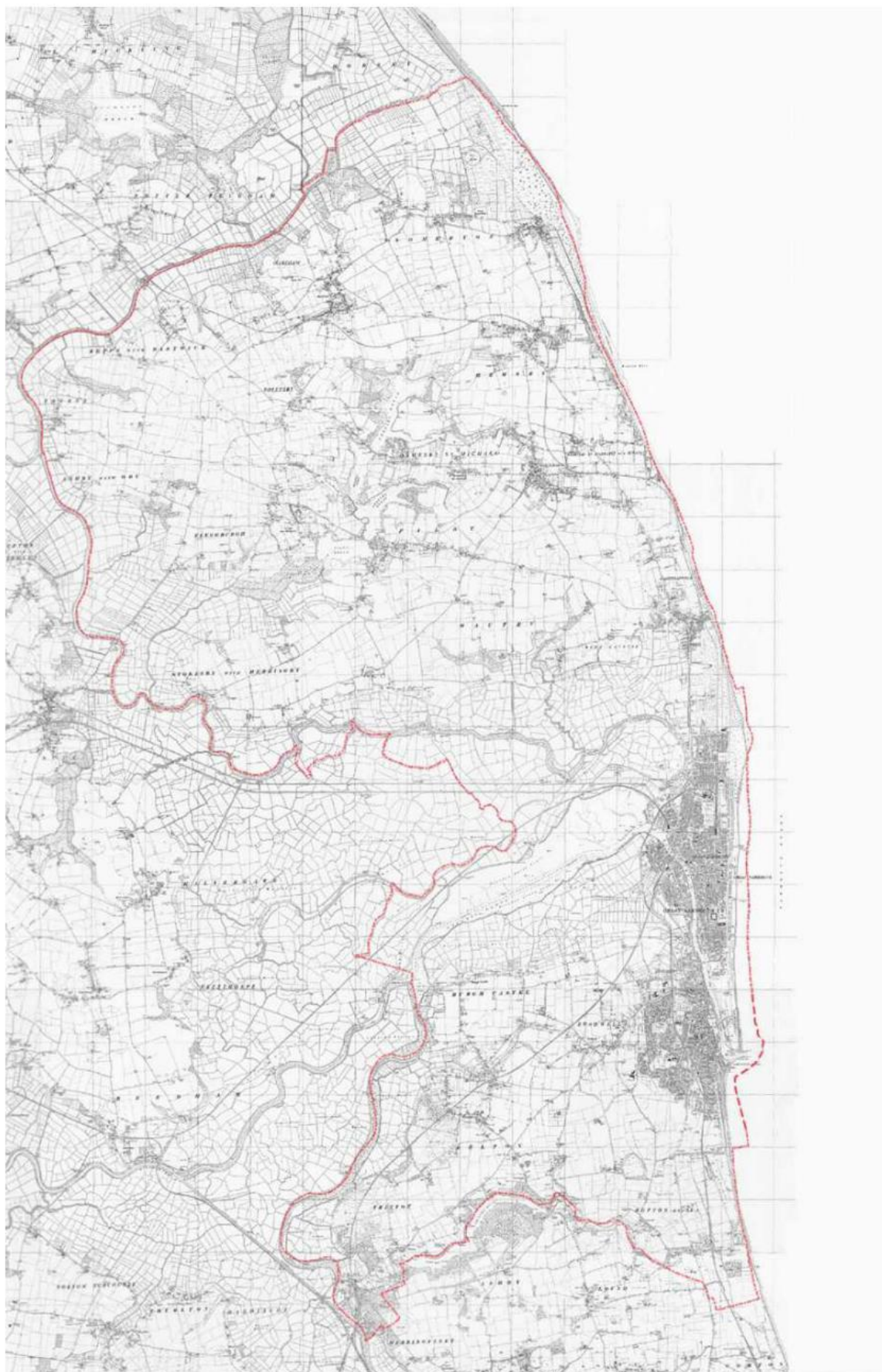


Fig. 6. Ordnance Survey map from 1949. This map can be further explored via the National Library of Scotland website, <https://maps.nls.uk/>

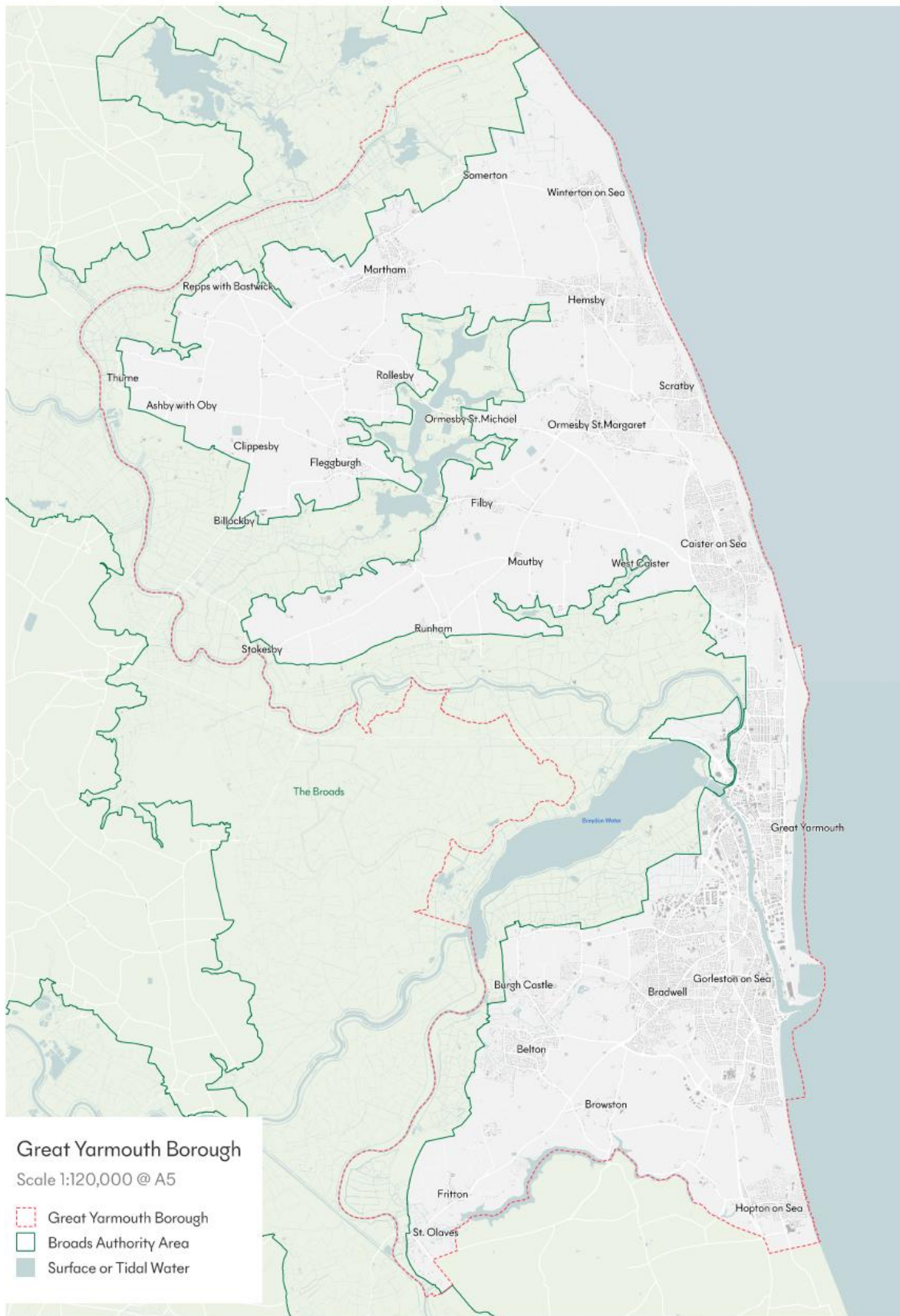


Fig. 7. Map of Great Yarmouth borough, 2023

3. Design vision for Great Yarmouth

3.1 Design vision

The Adopted Local Plan sets out clear objectives for the development of Great Yarmouth. These have been consolidated into a design vision for the borough, which underpins this design code.

The development of Great Yarmouth must:

- Protect and enhance the distinctive built and landscape character of the settlements in the borough
- Ensure new developments are of a quality that will be enduring and can become the civic heritage of the future.
- Be resilient to a changing climate and minimise carbon emissions and waste, including through reducing car use
- Be designed for the lifestyles, technology and needs of the present and the future, including supporting health and wellbeing, while complementing the heritage and landscapes of the borough.

Why is it design important?

The National Planning Policy Framework paragraph 126 states that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

Good design creates real benefits for communities - increasing pride in place, making healthier, safer environments, creating economic benefit and lowering carbon emissions. Conversely, poor design results in tangible harm.

Poor design creates environments that are not attractive to live in, work in, or to visit. This causes harm to local pride in place and erodes the distinctive identity of our built heritage and landscapes. It also erodes prospects for economic growth as liveable, attractive environments are an important factor in attracting and retaining businesses and residents.

Buildings and spaces that are poorly designed not only use more energy, and are responsible for more carbon emissions, than well-designed spaces; they can have a shorter lifespan and require demolition or substantial redevelopment within decades, rather than the centuries that our best-loved places have survived. This wastes the embodied carbon ‘locked into’ their building fabric.

Poor design can also lead to increased maintenance and long-term management costs, as well as the indirect costs from ill-health caused by inactive lifestyles, poorly designed and constructed building fabric or overheating; from the need to police poorly laid out spaces without natural surveillance; and from many other causes.

Well-designed, distinctive places with a strong and positive character make better environments for all parts of our community. Creating and enhancing the quality of our environment is central to the vision of our adopted and emerging Local Plans.

4. Borough wide design requirements

4.1 Addressing climate change and conserving resources

Climate change is the biggest challenge we face and it is a strategic priority for all development proposals to address this challenge through mitigation and adaptation.

Mitigating climate change means reducing greenhouse gas emissions, to slow down the rate of global warming and achieve the national commitment to reaching net zero carbon emissions by 2050. For development, this should be achieved by implementing the following measures:

- Minimising energy demand by building users through their behaviour, including travel mode choices
- Maximising energy efficiency of building fabric and systems
- Integrating renewable energy generation
- Minimising the carbon emissions resulting from construction

Adapting to climate change means designing development so that it is adapted to the changing climate, in particular hotter summers, wetter winters, and increased risks of surface water and tidal flooding. Climate adapted design must be achieved without resulting in increased emissions, for example from using air-conditioning to avoid overheating.

CC1: Ensure walking, cycling and public transport are the natural modes of travel for all users.

Expected	<p>Design site layouts so that walking and cycling routes to all destinations are more direct than routes for motor vehicles.</p> <p>Minimise the walking distance from front doors to public transport nodes through site layouts that incorporate direct walking routes.</p> <p>Ensure all development is as accessible as possible by public transport, by clustering development around existing or proposed public transport routes and increasing the density of development around public transport nodes.</p> <p>Ensure the quantity and location of cycle parking and storage is more easily accessible than car parking and storage.</p>
Policy links	<p>CS1: Focusing on a sustainable future</p> <p>CS9: Encouraging well-designed, distinctive places</p> <p>CS16: Improving accessibility and transport</p>

Why is reducing vehicle use so important, and how can design help?

Evidence shows that the transport habits of residents contribute far more to the overall carbon emissions resulting from new development, than the use of energy to heat, light and power the home, or the carbon generated by its construction. It is therefore important that designs for new developments help encourage a shift to lower-carbon lifestyles as far as possible.

Making walking and cycling easier does not mean that people who need to use a car, either regularly or occasionally, will be stopped from doing so. Parking for disabled residents, for example must still be provided at the doorstep. It just means making it more convenient for other residents to walk, cycle and use public transport as much as they can.

Locating development in places that are easily accessible by walking, cycling and public transport helps reduce car use, but residents' habits are a big factor. Residents will choose to use their car, even for very short journeys that could be made by walking or cycling, if it is more convenient.

If walking and cycling routes are shorter than routes for cars; and if cycles can be stored more safely, quickly and conveniently than cars, people do change their everyday habits. Even partial changes in habits can have a big impact on carbon emissions.

The shift to electric vehicles is not currently likely to reduce carbon emissions resulting from car use quickly enough to reach the country's net zero target. There will still be 'legacy' petrol and diesel vehicles on the road for decades. Current data shows vehicle use increasing, not decreasing, so even though some of this increase will be offset by the use of electric vehicles, forecasts show that in most scenarios, carbon emissions from transport will only fall by around 40% between 2022 and 2050.

It is therefore important that new development is designed to encourage as much behavioural change as possible. Changing designs for developments in order to create behavioural change does not cost the resident, the developer or the public sector anything. In fact it reduces costs for residents due to allowing them to reduce their car use without sacrificing convenience, it improves development viability by using less land for parking through more efficient parking layouts, and it reduces the costs to the public sector of ill-health, air pollution and congestion.



Fig. 8. Left: At Marmalade Lane, Cambridge, car parking is located in an unallocated shared parking area at the edge of the site and far from front doors, while cycle storage and parking is close to homes. Right: At Gt Kneighton, Cambridge, walking and cycling routes provide short cuts making it easier and quicker to walk or cycle to shops, school, friends and other local destinations.

CC2: Minimise active heating and cooling requirements through passive design

Expected	<p>Use simple building forms and massing as these are more energy efficient than complex forms.</p> <p>Design internal layouts and storey heights to maximise thermal efficiency and natural cross-ventilation.</p> <p>Do not include single-aspect homes due to the impossibility of cross-ventilation.</p> <p>Design south and west facing glazing to prevent overheating, and therefore the requirement for active cooling, through careful sizing and placement of glazing, integrating external shading devices which prevent summer overheating while allowing solar gains to heat spaces in winter.</p> <p>Ensure natural ventilation can be used as far as possible, and allows secure ventilation even when homes are unoccupied.</p>
Best practice	<p>Evidence compliance with Passive House standards</p> <p>Evidence compliance with a TM59 overheating assessment (for residential) or TM52 (for non-residential/mixed-use) buildings</p>
Policy links	<p>CS12: Utilising natural resources</p> <p>A2: Housing design principles</p>

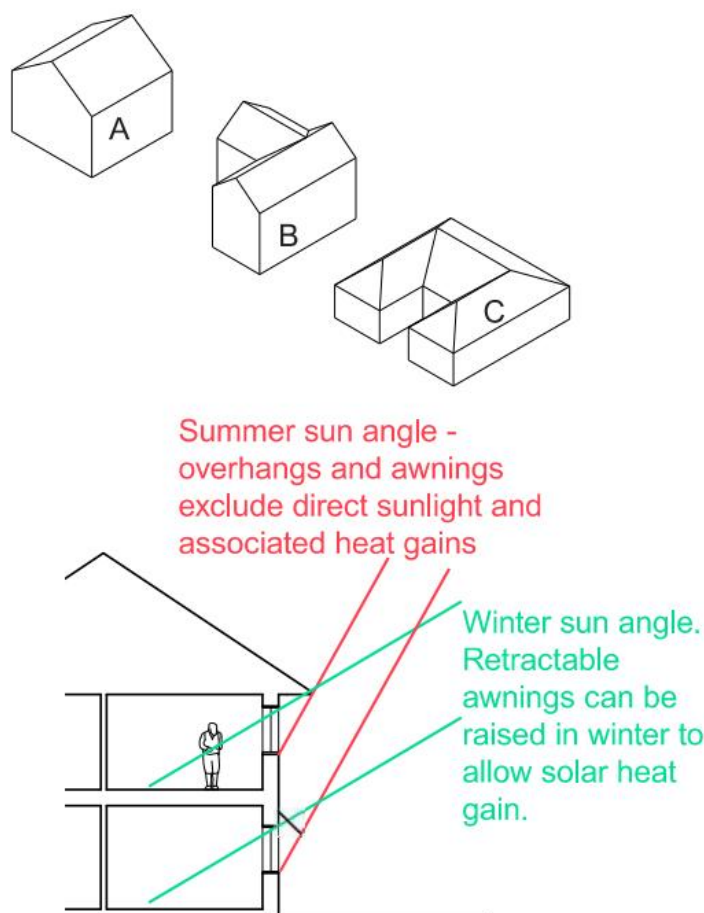


Fig. 9. Diagrams illustrating some of the principles of passive design.

Top: Building forms A, B and C have the same floor area but differing amounts of surface area. As a result, C has a heat loss of 17.5% more than A.

Bottom: Diagram showing how to design for passive solar heating in winter while avoiding summertime overheating. Diagram applies to south-facing glazing. Careful design of shading such as roof overhangs, awnings, brise-soleils or canopies will cut out the higher angle of sunlight from summer sun, while allowing winter sun to penetrate and heat spaces, reducing heating costs in winter.

External shading is far more effective at preventing overheating than internal blinds as it stops sunlight entering internal spaces and heating them up. It also allowing indirect daylight to enter so rooms do not become dark.

Floor-to-ceiling glazing on south-facing elevations contributes little to daylighting internal spaces. It can cause light pollution issues, and increase overheating unless shaded from direct sun. Raising sills makes overheating less likely.

CC3: Integrate on-site renewable energy generation and low and zero carbon heating, cooling and ventilation systems

Best practice	<p>Use air source or ground source heat pumps to provide heating where practicable.</p> <p>Include PV panels on south, east and west facing pitched roofs, and on flat roof areas.</p> <p>Include PV panel shelters over surface car parking spaces.</p> <p>Use mechanical ventilation with heat reclaim (MVHR) ventilation systems.</p> <p>Undertake operational energy assessment including predicted user-generated energy loads.</p>
Policy links	<p>CS12: Utilising natural resources</p> <p>A2: Housing design principles</p>

Using passive design and low-carbon technology

Passive design means using the building form to reduce the amount of energy needed to heat the building in winter, and to prevent overheating in summer. This results in lower running costs, lower carbon emissions, and more comfort for users.

The main principles of passive design are:

- Use simple shapes with a lower ratio of envelope (external wall/roof surface) to volume, because these lose and gain heat more slowly.
- Avoid large areas of south-facing glazing unless shaded to cut out summer sun
- Avoid large areas of west-facing glazing as it is difficult to shade effectively because the angle of west-facing sun is very low
- Design openings, and internal layouts, so that spaces can be naturally ventilated and cross-ventilated (openings on opposite sides of the building). Design openings so they can be left open without compromising security, and can be opened to varying degrees without being caught by the wind.

Passive design should be employed first, to reduce the need for active heating or cooling, before adding low- and zero-carbon technology. Additional technology all uses some energy, requires servicing and maintenance, and has a limited lifespan.

Heating uses far more energy than lighting and small power, so reducing carbon emissions from heating is very important.

The UK's electricity network is rapidly becoming entirely low-carbon, so using electricity to heat buildings does not involve high carbon emissions. Direct electric heating (such as electric panel heaters) is expensive to run, but air-source or ground-source heat pumps are energy efficient so should be used as the heat source where practicable. Solar thermal panels (which are different from PV panels, which only generate electricity) are also an effective way to provide zero-carbon hot water and heating.

PV (photovoltaic) panels on roofs can generate electricity but at a domestic scale, are not usually big enough to provide all of the home's needs, so grid electricity will still be used. If costs are tight, it is better to change the heat source to a low-carbon electrically powered system, such as an air source heat pump, than to install PV panels. Installing PV panels but using gas for heating is not a low-carbon approach.

CC4: Minimise potable water use

Required	Design new residential development, and holiday accommodation in buildings, to use 110 litres of potable water, per person per day, or less.
Expected	Integrate rainwater harvesting and greywater reuse to reduce potable water use in non-residential developments.
Best practice	Integrate rainwater harvesting and greywater reuse to reduce potable water use for residential developments. Design non-residential development to achieve full credits for category Wat 01 of BREEAM.
Policy links	E7: Water conservation in new dwellings and holiday accommodation

CC5: Reduce embodied carbon emissions resulting from construction

Best practice	Retain and reuse existing structures where this is the most carbon efficient option and the structure contributes, or can be suitably adapted, to the positive character of the local area. Undertake and submit an embodied carbon assessment
Policy links	SO6: Strategic Objective 6



Fig. 10. Retrofit of existing buildings saves carbon in the construction process, and through improving operational energy efficiency, while breathing new life into tired buildings.

Example: Hillington Square housing retrofit, Kings Lynn, designed by Mae Architects. This project retrofitted social housing built in the late 1960s to make it more energy efficient, repurpose unused and unattractive ground floor garage space, adding new balconies and replacing raised walkways with internal lift and stair cores.

CC6: Ensure development is flood safe and flood resilient

Required	<p>Design within Flood Zones 2 and 3 to comply with Environment Agency requirements regarding height of floor levels for habitable rooms, refuge and evacuation, and flood resilient construction, while ensuring active frontages and accessible accommodation (refer to BD1 and BD3 for further guidance)</p> <p>Ensure development does not increase the risk of flooding on adjacent sites, through use of SuDS (refer to CC7 for further guidance)</p>
Expected	Comply with LLFA guidance for flood safety and resilience.
Best practice	Use salt tolerant materials and construction below the flood datum, in areas at risk of tidal flooding.
Policy links	CS13: Protecting areas at risk of flooding and/or coastal change

CC7: Reduce the risk of surface water flooding on and around the site

Expected	<p>Apply the LLFA's Developer Guidance appropriately to all developments for surface water management.</p> <p>Meet surface water run-off rates required by the Lead Local Flood Authority (LLFA).</p> <p>Submit detailed design drawings of all proposed SuDS features to demonstrate compliance with the principles and standards set out in the CIRIA SuDS Manual.</p> <p>Maximise the amount of permeable and absorbent surfaces on the site.</p> <p>Use surface level SuDS systems rather than below ground attenuation tanks or storage.</p> <p>Locate and design SuDS to form part of the wider green infrastructure network, linking existing and future habitats.</p> <p>Integrate SuDS into the design of streets, public open spaces and parking as visually appealing features that contribute to creating distinctive character to development.</p> <p>Design SuDS to be multifunctional, for example as wildlife habitats, for formal or informal recreation, for parking, to support community educational learning, an/ord for rainwater/stormwater harvesting and reuse.</p> <p>Avoid fences around SuDS features such as ponds and watercourses, through design of gradients and depths, and use of natural planting as a barrier.</p> <p>Integrate SuDS into building design through including green, brown or blue roofs.</p> <p>Design SuDS to be low-maintenance. Where maintenance is required, integrate access and buffer zones into the wider landscape design.</p>
Policy links	CS12: Utilising natural resources



Fig. 11. Examples of successful SuDS integrated with a range of settings.

Top: SuDS within residential development is easier to maintain, more beneficial for biodiversity and more effective at managing surface water flows if designed to grow wild rather than being mown. Leiuwen, Netherlands and St Andrews Park, Uxbridge

Middle: Rain gardens in urban settings can soften the landscape, provide attractive features, and help keep street trees watered. Sheffield and Derby

Bottom: Natural SuDS should be included in all landscaping, including business parks and out of town settings. Left: Image from Natural England GI Framework, Right: East Lothian

CC8: Reduce urban heat island effect

Best practice	<p>Minimise hard landscaping and maximise soft landscaping, including water surfaces.</p> <p>Shade hard landscaped spaces, streets and paths through tree planting and/or awnings and other adjustable shading devices.</p> <p>Use insulating and heat reflecting materials for both buildings and landscapes, including for roofs. These can include green and brown roofs and light coloured materials.</p>
Policy links	SO1: Strategic Objective 1

CC9: Minimise resource usage through future building maintenance, alterations and adaptation

Best practice	<p>Use materials that can be reused and recycled at end of life</p> <p>Design to minimise energy intensive maintenance requirements over the lifetime of the development.</p> <p>Design buildings to be adaptable to different uses without requiring demolition.</p> <p>Design short-life systems and materials –for example mechanical and electrical installations – to be replaceable without requiring substantial alterations to long-life building elements, such as structure and external envelope.</p>
Policy links	SO1: Strategic Objective 1

Reducing the urban heat island effect

The urban heat island effect occurs when hard landscaping, a lack of shading, and dark coloured materials absorb heat from the sun and increase temperatures in the area. A recent study showed that the Kilburn and South Hampstead area in London, with 38% vegetation cover, experienced heat over 7°C hotter than Regent's Park with 89% vegetation cover, just a short distance away.¹

Urban heat is a particular problem at night, due to materials like concrete and stone absorbing heat in the day then slowly releasing it at night. This prevents urban areas cooling down, intensifying heatwaves, and can cause stress and health issues and acutely impacts vulnerable citizens – including children and the elderly.

Vegetation cover and albedo are two of the most important factors which determine the strength of the urban heat island effect. Albedo describes how reflective a surface is. High albedo surfaces, such as white roofs, are reflective and absorb less heat than low albedo surfaces such as asphalt roads. Vegetation cools the air around it through the evaporation of water.

Spaces that are designed to maximise vegetation, shade and high albedo surfaces, can reduce the urban heat island effect and make built-up areas more comfortable, as well as reducing energy use on cooling internal spaces, and encouraging people to walk and cycle during hot weather.

1 Arup, Urban Heat Island Snapshot, 2023 - <https://www.arup.com/perspectives/publications/research/section/urban-heat-island>

Useful resources

- LETI has a wide range of free resources on low-carbon design, specification and procurement - <https://www.leti.uk/publications>
- The Passivhaus Trust has a wide range of free resources on low-carbon passive design - <https://www.passivhaustrust.org.uk/guidance.php>
- Good Homes Alliance Overheating in New Homes Tool and Guidance - <https://goodhomes.org.uk/overheating-in-new-homes>
- Prometheus weather data for Great Yarmouth can be downloaded free at <https://engineering.exeter.ac.uk/research/cee/research/prometheus/downloads/>
- The CIRIA SuDS Manual (C753) and the accompanying Guidance on the construction of SuDS (C768) are the definitive guide to design and maintenance of sustainable drainage systems (SuDS) and are available for download free at www.ciria.org
- Natural England guidance - Introduction to Freshwater Wetlands for Improving Water Quality - JP044 (<https://publications.naturalengland.org.uk/>)
- Norfolk County Council, as the LLFA, have guidance for developers at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

4.2 Context and identity

Well-designed development makes a positive contribution to its context, strengthening local distinctiveness and a sense of place. This is achieved through careful observation and analysis of the site's setting at the start of the design process.

Copying all aspects of building form or styles from the site context is rarely an option due to contemporary requirements, such as space standards, fire and flood safety, energy efficiency, accommodating the private car, and other aspects of design. Good design harmonises with its context while developing its own distinctive character.

Further design code requirements regarding context and identity are found in the area specific design requirements. This section contains general code requirements and expectations that apply across all area types and forms of development.

CI1: Design with regard to local context, including the surrounding built environment, topography, landscape and drainage.

Required	<p>Analyse the site context with regard to development form and pattern, landscape topography and character, heritage assets, green and blue spaces, underlying soils and geology, views to and from the site, and locally prevalent materials and building details, and submit analysis within Design & Access Statement.</p> <p>Ensure existing and proposed drawings, including 3D visualisations, show surrounding context accurately and to scale, including relevant adjacent phases of development or consented development by others.</p>
Expected	<p>Design site layout to complement the existing landscape and built environment, including the pattern of development, landscape and townscape.</p> <p>Design layout and massing so that existing significant views are retained and enhanced, and new publicly accessible views of significant natural and built assets are created.</p>
Policy links	<p>A2: Housing design principles</p> <p>CS9: Encouraging well-designed, distinctive places</p> <p>E5: Historic environment and heritage</p>



Fig. 12. Great Yarmouth's landscapes are characterised by long views over flat landscapes. Ensuring new development is well-integrated and screened, taking advantage of existing mature trees and hedges and incorporating new planting, means it integrates more successfully in the landscape.

CI2: Conserve and enhance the significance of heritage assets

Expected	<p>Retain non-listed buildings/structures which make a positive contribution to the significance of a conservation area, or are non-designated heritage assets, in line with policy E5.</p> <p>Design proposals to respect and enhance the settings of all relevant heritage assets, including creating and respecting publicly accessible framed views of heritage landmarks.</p> <p>Include appropriate interpretation of heritage sites within development proposals, including signage.</p>
Policy links	<p>CS10: Safeguarding local heritage assets</p> <p>E5: Historic environment and heritage</p>



Fig. 13. Examples of recent design that is sympathetic to the local context including heritage settings.

Top left: St George's Chapel pavilion in the heart of Great Yarmouth. Architect: Hopkins Architects

Top right: Hunsett Mill, Stalham, Norfolk. Architect: Acme

Bottom left: New wing at Brentwood School, Essex sits comfortably alongside historic buildings. Architect: Cottrell and Vermeulen.

Bottom right: Contemporary design using traditional materials within the heritage setting at Ely Museum. Architect: HAT Projects

CI3: Create a positive and distinctive sense of place for new development

Required	Develop a clear design approach for all development which will create, or reinforce, a distinctive and place-specific local identity. Use the Design & Access Statement to demonstrate how this has been achieved.
Expected	<p>Include distinctive, beautiful and unique features within major development. Features may include landmark buildings, high quality public art, public realm and landscaping, including SuDS.</p> <p>Create a range of character areas within large-scale housing developments which comprise significant extensions to existing settlements (such as those allocated by Policies CS18, GN1 and CA1) to achieve a clear design identity for each street or cluster. This should also be addressed at outline application stage as part of a masterplanned approach, and can be achieved through the use of different approaches to layout, house designs, or variation in materials and details.</p> <p>Include a range of house types on larger developments, with a clear design-led rationale for their usage and placement. Standard house types must not be used without being adapted to create a distinct local identity.</p> <p>Refer to development type requirements in 6.1.</p>
Policy links	CS9: Encouraging well-designed, distinctive places A2: Housing design principles

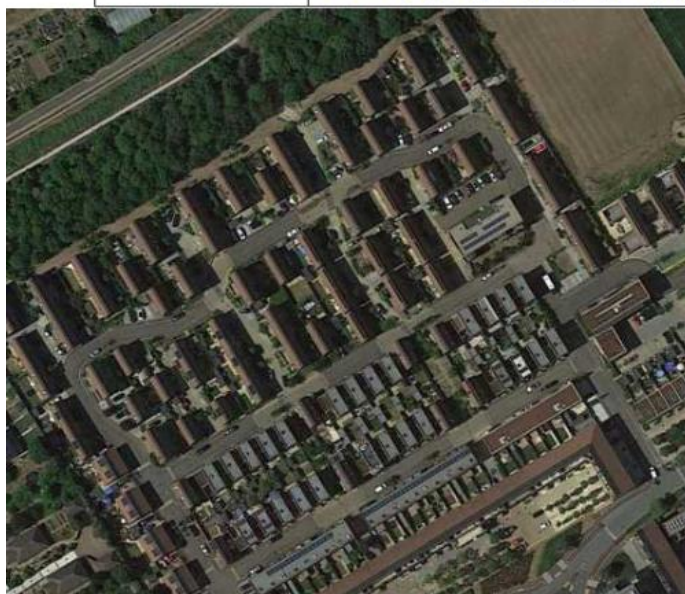


Fig. 14. Examples of large sites with clearly defined character to different parts of the development, achieved through careful masterplanning. Both developments show a legible and well-connected street layout using a broadly gridded arrangement.

Left: Great Kneighton, Cambridge showing areas with long, linear building forms (top) running perpendicular to streets, contrasting with terraced homes with gable ends facing the street, (middle) which articulate each dwelling, and terraces which have their eaves to street (bottom)

Right: New Hall, Harlow where a broadly perimeter block layout shows variation in design and materiality which is clearly visible from the air as well as on the ground. Each block is relatively uniform in itself, with repeated house types, but as a whole the development has variety.

CI4: Use external materials and detailing which complement the local context and are appropriate for the local climate

Expected	<p>Use materials and details which reflect the local vernacular, unless a clear design-led rationale is presented for an alternative approach. A description of the most commonly found materials in Great Yarmouth Borough can be found in chapter 2, and more detailed descriptions of materials in existing character areas can be found in chapter 5.</p> <p>In most locations, use a single primary material for external elevations with contrasting materials used for details and secondary features only.</p> <p>Use materials and details which are robust and suitable for the local climate, in particular in waterside and marine settings.</p> <p>Alterations and energy efficiency improvements should not obscure high quality existing external materials such as brick and flint work. Replacement windows, balcony metalwork and similar should be of similar quality as the existing.</p>
Policy links	CS9: Encouraging well-designed, distinctive places

Useful resources:

- National Model Design Code - <https://www.gov.uk/government/publications/national-model-design-code>
- National Design Guide - <https://www.gov.uk/government/publications/national-design-guide>
- Historic England's website has a wide range of resources on planning, design and the historic environment - <https://historicengland.org.uk/advice/find/a-z-publications/>
- CABI's guide Creating Successful Masterplans is, while dating from 2004, a highly useful and relevant guide to masterplanning large development sites - <https://webarchive.nationalarchives.gov.uk/ukgwa/20110118095356/http://www.cabi.org.uk/files/creating-successful-masterplans.pdf>



Fig. 15. New housing developments creating attractive places at a range of scales that successfully address the public realm and use materials relevant to the Great Yarmouth context.

Top: Tibby's Yard, Southwold uses typical Suffolk materials and colours, and attractive low brick walls as boundary treatments. Architect: Ash Sakula

Middle left: townhouses with integrated garages facing a well-landscaped public realm at Great Kneighton, Cambridge. Architect: Proctor Matthews.

Middle right: Molenplein, Den Helder, the Netherlands has a varied and informal streetscape creating high-density, low-rise development using simple materials. Architect: Tony Fretton

Bottom left: Traditional East Suffolk brick and pantile used with a very simple and efficient form, attractively composed, at Walberswick. Architect: Dow Jones.

Bottom right: detached homes with attached garages form an orderly mews-style development at Pewsey, Wiltshire. Architect: Tony Fretton

4.3 Streets, movement and parking

Successful places have an intuitive, safe and well-connected movement network that prioritises walking and cycling and the needs of vulnerable user groups, and minimises the impact of necessary vehicle movement. Streets and movement routes should be attractive, contributing to the distinctive sense of identity in new development and reinforcing the positive character of existing neighbourhoods.

General note: this section must be read in conjunction with Norfolk County Council's Safe, Sustainable Development Aims and Guidance Notes¹. This sets out the aims, requirements and technical standards for the provision of new and altered highways infrastructure for all users, and indicates what will be acceptable to Norfolk County Council as the Local Highways Authority.

See also the code requirements in [4.4 Public open space, nature and water](#)

SM1: Create a walkable and integrated network of streets and pedestrian/cycle routes.

Required	Integrate all relevant strategic walking and cycling routes into site layouts and demonstrate through the Design & Access Statement submitted.
Expected	<p>Design major developments around a clear hierarchy of connected streets which are orientated to address key pedestrian desire lines, promote permeability and create a legible environment.</p> <p>Use site layouts to link existing streets, paths and cycle routes in the wider area, and to create new cycling and walking routes that connect local destinations and encourage active travel.</p> <p>Make connections and through routes to adjoining land and highways, to improve permeability and to avoid sterilising future sites for development.</p> <p>Avoid cul-de-sacs that do not include pedestrian and cycling rights of way forming through routes to the wider movement network. Cul-de-sacs and private drives are acceptable only as tertiary streets serving five homes or fewer.</p>
Policy links	GSP7: Potential strategic cycling and pedestrian routes CS9: Encouraging well-designed, distinctive places A2: Housing design principles

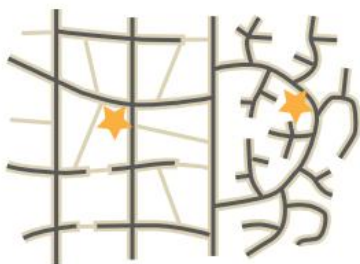


Fig. 16. Diagram showing different approaches to movement networks.

Left: integrated permeable movement network with pedestrian and cycle routes that follow direct desire lines to destinations while vehicle traffic is restricted.

Right: non-permeable movement network where pedestrian and cycle routes are not quicker or more direct than vehicle routes and do not follow desire lines to destinations.

¹ <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/highway-guidance-for-development/publications>

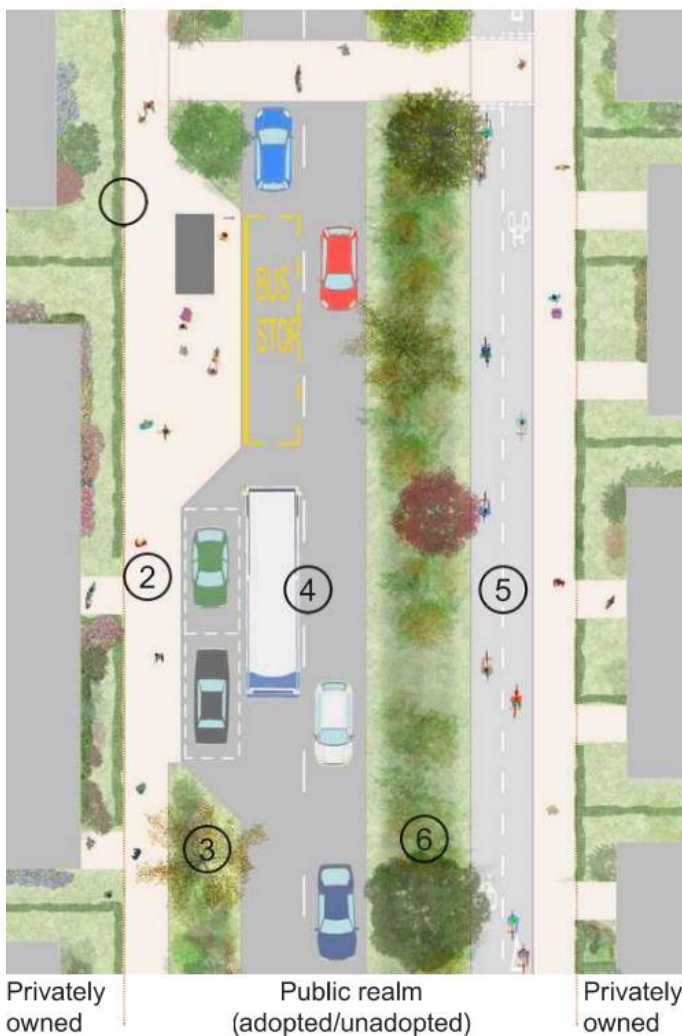
SM2: Design movement routes to clear and consistent standards which prioritise vulnerable users, children, pedestrians and cyclists.

Required	Design all movement routes to be safe and accessible to all members of the community and demonstrate through Design & Access Statement
Expected	<p>Consider the needs of all users, including physically disabled people, people with visual impairments, and neurodiverse people, in the design of streets and movement routes.</p> <p>Include separate cycle lanes on all new streets other than local and tertiary streets.</p> <p>Use design to passively slow vehicle movements, for example through narrowing the carriageway, choice of surface materials, trees and landscape features.</p> <p>Integrate high quality wayfinding features and signage, and lighting, into the design of movement routes.</p> <p>Apply the design principles and standards within Manual for Streets 1 and 2, LTN 1/20, NCC Safe and Sustainable Development Guide</p> <p>Follow the principles of the street design examples in figures 18-24, which show indicative acceptable approaches to new streets within new masterplanned development.</p>
Best practice	Accessibility audit and dedicated report
Policy links	<p>CS9: Encouraging well-designed, distinctive places</p> <p>A2: Housing design principles</p>



Fig. 17. Diagram from the National Model Design Code illustrating the different levels in the street hierarchy.

Fig. 18. Example new primary street layout



1. Hedge to front property boundary
2. Footway (minimum 2m wide)
3. SuDS with street trees, bus stops, visitor parking (swales or rain gardens linked with culverts under hard landscaped buildouts)
4. Two-way carriageway
5. Two-way fully segregated cycle track (min 3m wide)
6. Street tree species to reach 12m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level



Example: New Hall, Harlow

Fig. 19. Example new high street layout



1. Building line at rear of footway typically
2. Footway (minimum 2m wide) next to building line, to be kept unobstructed of outdoor seating, A-boards, signage, lighting columns
3. 2m wide area for outdoor seating, play on the way, cycle parking.
4. Fully segregated cycle track on both sides of street (each lane minimum 2m wide)
5. Multifunctional SuDS zone with street trees, bus stops, drop-off/delivery bays, blue badge parking. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
6. Two-way carriageway
7. Street tree species to reach 12m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level



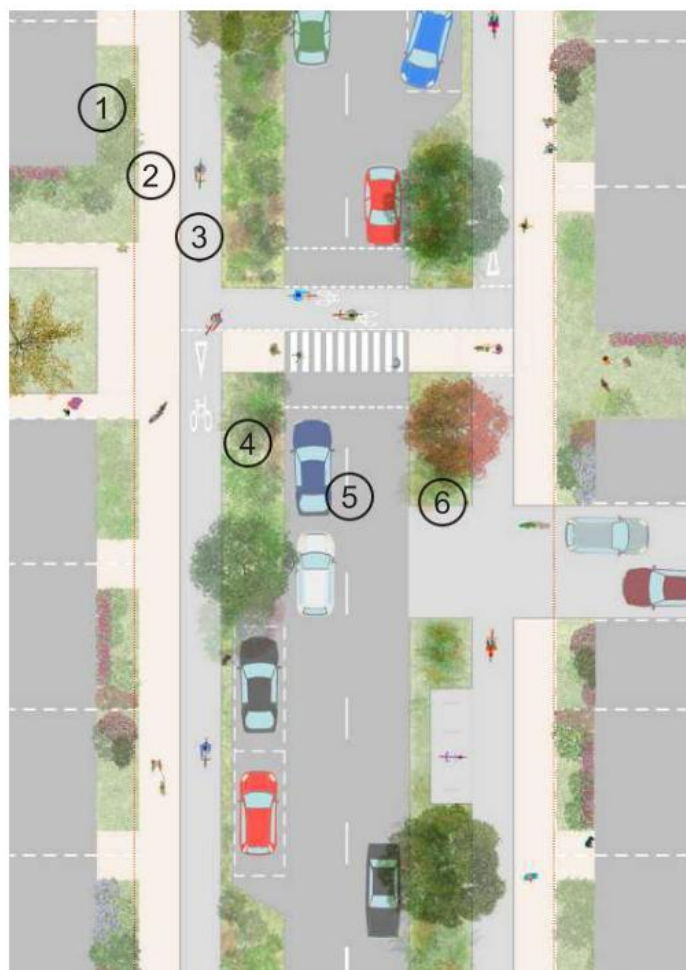
Privately owned Public realm (adopted/unadopted) Privately owned

Examples of High Streets with cycle tracks, SuDS, trees and seating alongside necessary vehicle traffic.

Top: Eastcote High Street SuDS.

Bottom: Floating bus stop, Woolwich Road, London

Fig. 20. Example new secondary street layout with segregated cycleway both sides



Privately owned

Public realm
(adopted/unadopted)

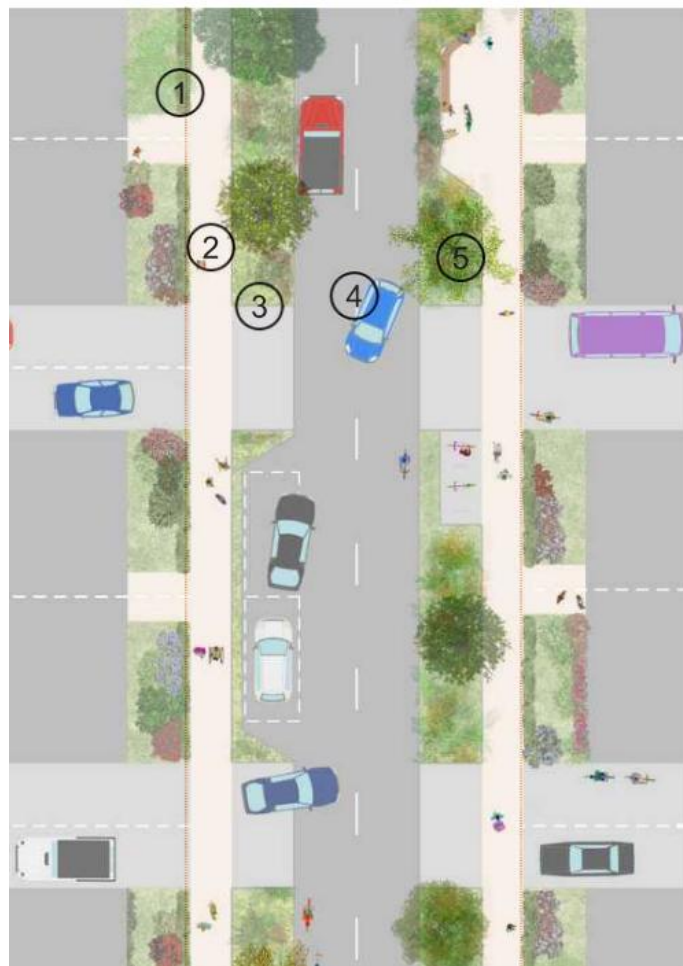
Privately owned

1. Low level planting to front of plots
2. Footway (minimum 2m wide)
3. Fully segregated cycle track on both sides of street (each lane minimum 2m wide)
4. Multifunctional SuDS zone with street trees, visitor car and cycle parking, social seating areas. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
5. Two-way carriageway
6. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level

Example of secondary streets: generous footways separated from the carriageway by street trees provide a place for informal socialising at the doorstep at Eddington, Cambridge



Fig. 21. Example new secondary street layout with on-street cycling



Privately owned

Public realm (adopted/unadopted)

Privately owned

On-street cycling is only suitable for streets with a 20mph speed limit and under 2000 vehicle movements per day

1. Hedge or low level planting to front of plots
2. Footway (minimum 2m wide)
3. Multifunctional SuDS zone with street trees, visitor car and cycle parking, social seating areas. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
4. Two-way carriageway with on-street cycling
5. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level

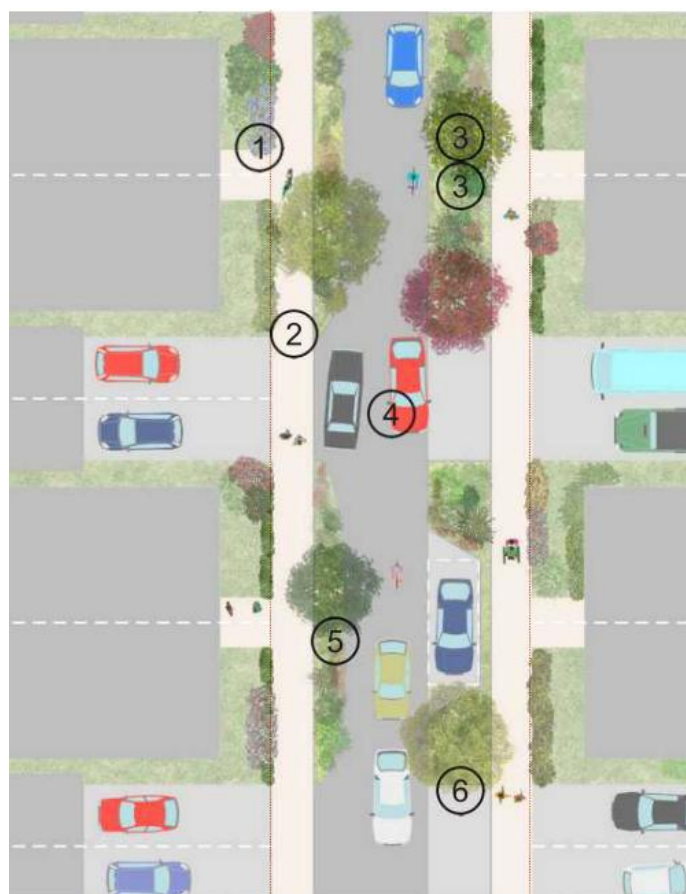


Examples of secondary streets:

Top: Vauban, Freiburg

Bottom: Eddington, Cambridge

Fig. 22. Example new local street layout



Privately owned Public realm (adopted/unadopted) Privately owned

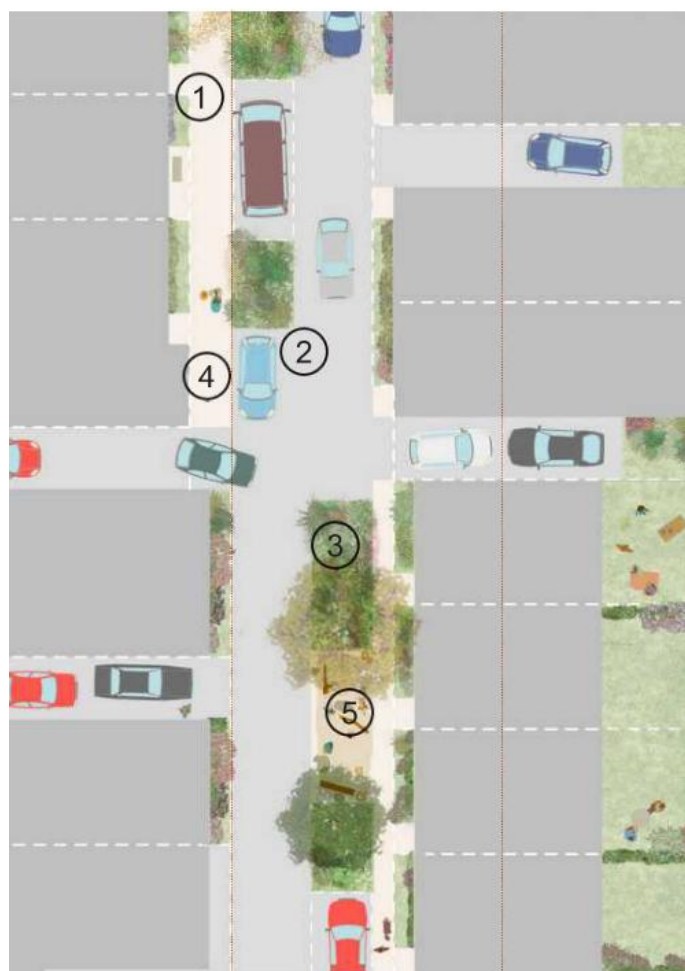
On-street cycling is only suitable for streets with a 20mph speed limit and under 2000 vehicle movements per day

1. Hedge or low level planting to front of plots
2. Footway (minimum 2m wide)
3. Multifunctional SuDS zone with street trees, visitor car and cycle parking, social seating areas. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
4. Two-way carriageway with on-street cycling
5. Build-outs with street trees to narrow carriageway, slow traffic and deter kerbside parking.
6. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level



Example of local residential streets at Great Kneighton, Cambridge

Fig. 23. Example new tertiary street layout (green mews type, shared space)



Privately owned Public realm (adopted/unadopted) Privately owned

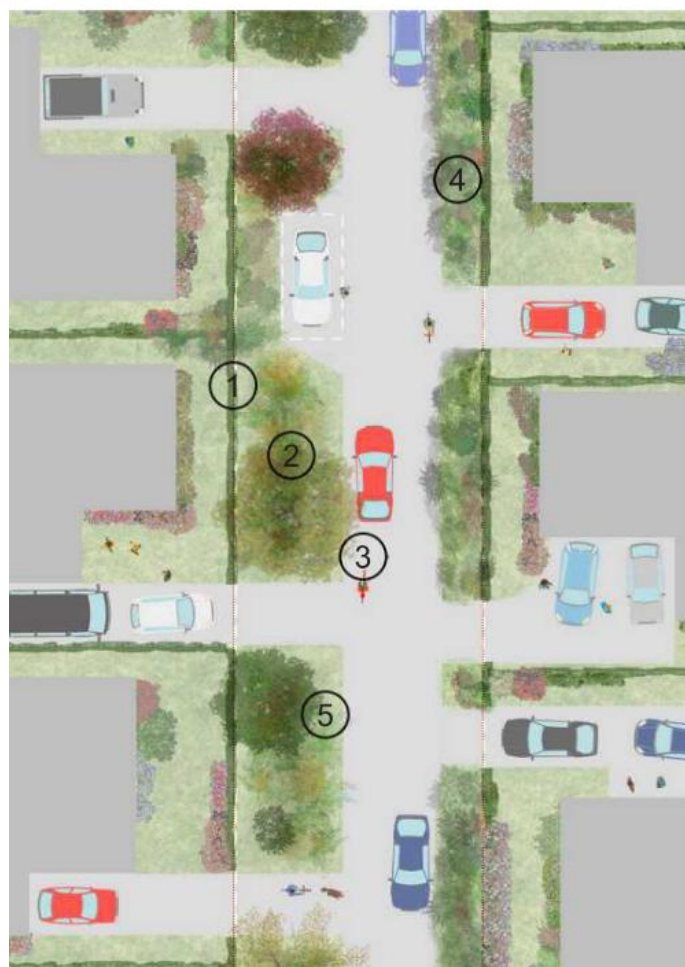
Shared space layouts are only suitable for low-traffic streets with no through route for vehicles.

1. Low level wall, railings or low level planting to front of plots with little or no setback to building line
2. Shared space carriageway for walking, cycling and pedestrians designed to slow vehicle movements to walking speed
3. Multifunctional SuDS zone with street trees, visitor car and cycle parking, social seating areas. SuDS to be swales or rain gardens linked with culverts under hard landscaped buildouts.
4. Footway between SuDS / multifunctional zone and private boundaries (minimum 2m wide where present)
5. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level



Example of local residential streets: Great Kneighton, Cambridge

Fig. 24. Example tertiary street layout (rural lane type)



Shared space layouts are only suitable for low-traffic streets with no through route for vehicles.

1. Hedge or low level planting to front of plots with generous setback to building line
2. Soft verge / SuDS zone with street trees
3. Shared space carriageway for walking, cycling and pedestrians designed to slow vehicle movements to walking speed
4. Soft verge / swale on both sides of street
5. Street tree species to reach 10m height, 5.5m diameter at 25 years. Canopy to be kept at least 3.2m above ground level

Privately owned

Public realm
(adopted/unadopted)

Privately owned

SM3: Create multifunctional streets which contribute to creating vibrant and active communities.

Expected	<p>Integrate seating, informal play and other functional features into the design of streets and movement routes at all levels of the street hierarchy.</p> <p>Design local and tertiary streets as low-speed public realm following homezone/Woonerf street principles to encourage outdoor play and social contact.</p>
Policy links	A2: Housing design principles



Fig. 25. Examples of multi-functional streets which allow necessary vehicle access but prioritise pedestrians and include play features, planting and social spaces.

Top left: Marmalade Lane, Cambridge

Top right: Van Gogh Walk, London

Middle left: Woonerf street, Netherlands

Middle right: Lime Tree Square

Bottom left: Great Kneighton, Cambridge

SM4: Ensure the amount and design of cycle parking and storage encourages cycling on an everyday basis.

Required	Show location, type and specification of cycle storage and parking within Design & Access Statement as well as Transport Statement / Transport Assessment (where applicable)
Expected	<p>For non-residential development, meet NCC minimum requirements for the amount and design of cycle storage and parking.</p> <p>For residential development, meet the following requirements for cycle storage in order to meet household needs in full, including cycles for children, for sport and leisure, and for visitors.</p> <ul style="list-style-type: none"> • For one-bedroom dwellings and HMOs, provide 1 resident cycle space per bedspace, and 1 visitor space per dwelling/HMO room. • For dwellings of two or more bedrooms, provide 1 resident cycle space per bedroom, plus one additional resident space, and 1 visitor space per dwelling. For example a three-bedroom dwelling should have 4 resident spaces and 1 visitor space. • For retirement housing, provide 1 secure resident cycle space, and one visitor cycle space, per two bedspaces. Many older people use cycles, and in particular e-bikes, for exercise and leisure. • For all residential cycle storage, provide one electric outlet per two cycle spaces to facilitate e-bike charging. • Provide adequate secure cycle storage to accommodate at least one cargo bike per dwelling. • Cycle storage must be additional to garages counted as an allocated parking space towards vehicle parking standards , unless the garage is large enough to accommodate cycle parking as well as a car. • Cycle storage can be within curtilage of dwelling but must be secure and covered e.g. cycle locker; dedicated store/shed; dedicated space within hallway/ secure porch; dedicated space within expanded garage. • Visitor spaces can be uncovered and outside of a secure enclosure, e.g. a Sheffield stand <p>Where practicable, locate cycle storage closer to entrance doors, than car parking/storage.</p> <p>Ensure cycle storage is secure and naturally overlooked to deter theft.</p>
Policy links	CS9: Encouraging well-designed, distinctive places I1: Vehicle parking for developments

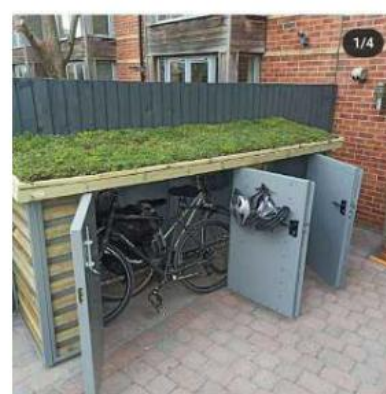


Fig. 26. Examples of attractive and functional cycle storage.

SM5: Ensure that the amount and design of car parking and storage is adequate and designed to minimize antisocial parking

Required	Show location, type and specification of car storage and parking and justify the quantity of provision within Design & Access Statement
Expected	<p>Have regard to NCC minimum requirements for the amount and design of car storage and parking across all forms of development.</p> <p>Provide lower levels of car parking in areas with good public transport, walking and cycling connections to local destinations, where this improves the overall design of the development. Use Public Transport Accessibility Levels and/or isochrone walking and cycling analysis to determine where lower levels of parking provision may be appropriate</p> <p>Include a mix of parking solutions (on-plot, on-street, shared parking areas/courts) to avoid a car-dominated environment.</p> <p>Avoid continuous front curtilage parking. Only include front curtilage parking where landscaping or a front garden can also be provided to reduce the visual impact of cars.</p> <p>Avoid rear parking courts unless they are well-overlooked, secure, small in scale and well-related to the car-owners property.</p> <p>Do not position garages (integrated or detached) forward of the front elevation of the associated dwelling to ensure garaging does not dominate the streetscene.</p> <p>Prevent pavement parking through well-designed physical deterrents along the kerb line, such as planting beds/SuDS features, bollards and/or street trees.</p> <p>Deter unplanned on-street parking through the design and layout of streets, and through inclusion and enforcement of parking restrictions.</p> <p>Use unallocated resident and visitor parking in mixed-use developments to reduce the overall amount of parking needed.</p> <p>Ensure visitor and employee parking includes electric car charging points and infrastructure to permit future additional charging points.</p>
Best practice	<p>Include car club provision as part of residential and mixed-use development.</p> <p>Design charging infrastructure to accommodate other vehicles including mobility scooters, electric cycles and electric buses.</p> <p>Provide electric car charging points (minimum of 7kW) within developments at the following levels:</p> <ul style="list-style-type: none"> • Dwellings with private parking: 1 charge point per dwelling (100% active) • Communal parking areas: 1 charge per parking space (50% active, 50% passive) • Employment: 30% with active charge points, and 30% with passive. • Retail: 20% of bays with active charge points, and 20% with passive.
Policy links	<p>I1: Vehicle parking for development</p> <p>A2: Housing design principles</p>

Preventing antisocial parking

On-street parking in designated bay helps accommodate delivery vehicles, service vehicles, visitor and overspill parking. However, uncontrolled parking at the kerbside can create a streetscape dominated by cars, and pavement parking reduces accessibility and safety for pedestrians, particularly vulnerable users including wheelchair users, users of pushchairs, and children.

Drivers will usually choose the easiest place to park, which is closest to their destination, even if this impacts other users and even when there are plenty of other spaces nearby. Pavement parking is rarely a symptom of inadequate provision of parking in the wider area. Use of planting, well-designed bollards at a spacing of 5m, street trees and other features will prevent pavement parking and ensure drivers park in designated visitor parking on the site.



Fig. 27. Examples of well-designed new developments that include on-street parking in a controlled way and deter unplanned parking.

Top left: SuDS used to prevent pavement parking by design. Image from the CIRIA SuDS Manual.

Top right: On-street parking between street trees, Greenhithe.

Middle left and right: use of bollards, trees and boundary treatments to deter unplanned parking, Lacuna, West Malling.

Bottom: SuDS used to prevent pavement parking at the Channels, Chelmsford.

SM6: Ensure adequate and well-designed access for servicing vehicles

Required	Analyse the requirements of the development in terms of size, numbers and types of commercial vehicles visiting and demonstrate that sufficient service vehicle provision is being made.
Expected	Design servicing access and dedicated service yards to be attractive and safe. Design servicing areas to be multi-functional outside of servicing periods, and integrated into the wider public realm design.
Policy links	CS9(e) - Encouraging well-designed, distinctive places

Useful resources:

- Manual for Streets (2007) - <https://www.gov.uk/government/publications/manual-for-streets>
- Manual for Streets 2 (2010) - <https://www.ciht.org.uk/media/9351/manual-for-streets-2.pdf>
- Cycle Infrastructure Design Local Transport Note (LTN 1/20) - <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>
- Historic England Streets for All (advice for highway and public realm works in historic places) - <https://historicengland.org.uk/images-books/publications/streets-for-all/>
- Norfolk County Council's Safe, Sustainable Development Aims and Guidance Notes - <https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/planning/safe-sustainable-development-2022.pdf>
- Sport England Active Design Guidance - <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

4.4 Public open space, nature and water

Communities must have access to good quality open spaces, and to nature and water, in order to support physical and mental health and wellbeing. Development must provide spaces that meet these needs, alongside improving the biodiversity of the local area. Biodiversity must also be improved through the provision of habitats as part of buildings themselves.

Green Infrastructure refers to the network of green and blue (water) spaces that support health and wellbeing, wildlife and carbon capture. Strengthening and extending the area’s Green Infrastructure network is a strategic aim of the Borough Council. This means creating and enhancing a network of green and blue corridors within development which join up wider habitats.

See also:

- CC6: Ensure development is flood safe and flood resilient
- CC7: Reduce the risk of surface water flooding on and around the site

PS1: Integrate existing natural features, including water and trees, in site layouts

Expected	Undertake and evidence a thorough analysis of existing site features and trees at an early stage to guide a landscape-led design approach Ensure development in urban neighbourhoods does not result in a net loss of green cover.
Policy links	CS11: Enhancing the natural environment E4: Trees and landscape A2: Housing design principles



Fig. 28. Examples of housing where existing mature trees and landscape features are used as the focal point of the layout.
Left: Carrowbreck Meadow
Right: The Avenue Saffron Walden

PS2: Provide a sufficient quantity, type, and quality, of public open space and green infrastructure with development

Required	Quantity of open space provided must comply with Policy H4 - Open Space provision for new housing development - and should refer to the Open Space SPD ² which contains numerical standards and guidance on typology design requirements.
Expected	<p>Integrate an appropriate range of public spaces, including green spaces, into development proposals.</p> <p>Design public spaces to be well overlooked, have a clear purpose and be in an accessible location within the development.</p> <p>Ensure public spaces include natural features, contribute to on-site biodiversity and minimise surface water run-off through use of SuDS. (Refer to CC7)</p> <p>Consider the needs of all users, including physically disabled people, people with visual impairments, and neurodiverse people, in the design of public spaces.</p> <p>Cater for a wide range of activities in public spaces, including meeting, resting, playing, holding events, sport and recreation, and be multi-functional where possible.</p>
Best practice	Meet the urban greening factors set out in Natural England's Green Infrastructure Standards of 0.3 for commercial development, 0.4 for residential brownfield development and 0.5 for residential greenfield development.
Policy links	GSP6: Green Infrastructure H4: Open space for new housing development



Fig. 29. Examples of public open space performing a range of functions, including biodiversity, play and informal recreation.

Left: St Chads, Thurrock, Bell Phillips Architects.

Right: Granville Estate, London, PTEa

PS3: Ensure public access to watercourses

Expected	<p>Create and/or retain public access to edge of watercourses and water bodies, with sufficient buffer zones to allow for maintenance and current/future flood defences.</p> <p>Design the level of waterside paths and public spaces so that a visual connection to the water can be maintained in relation to future flood defence levels.</p>
Policy links	<p>CS17(f) - Regenerating Great Yarmouth's Waterfront</p> <p>CS9(a) - Encouraging well-designed, distinctive places</p>

PS4: Improve biodiversity on and around the development site

Expected	<p>Use the location, type and design of open spaces, including SuDS, to improve the connectivity of wildlife habitats in the wider area, including the potential to connect to habitats that may be created through future adjacent development.</p> <p>Design open spaces to include a range of habitats which are suitable to the setting and climate of the site.</p> <p>Include habitat creation in the design of buildings, including car and cycle storage and parking structures, such as green roofs; climbing plants on walls; integral bird and bat boxes; insect habitats. Design fencing and walls to allow for movement of small mammals such as hedgehogs.</p> <p>Avoid the installation of green features which require extensive or specialist maintenance, such as 'living walls'. Climbing plants rooted at ground level are preferred</p>
Policy links	CS11: Enhancing the natural environment



Fig. 30. Public realm next to watercourses and water bodies can take many forms, from busy urban environments supporting socialising, to peaceful neighbourhood ponds providing calm and relaxation.

Left: Bristol waterfront. Right: Example from CIRIA SuDS Manual

PS5: Include street trees along movement routes and as part of public spaces

Expected	<p>All new streets to have suitable trees at regular intervals, chosen from species that are climate adapted and mature to a scale that provides substantial canopy cover</p> <p>Include new street trees on existing streets where possible as part of regeneration and redevelopment in existing neighbourhoods.</p> <p>Position street trees on median strips, in verges, between parking bays, and/or on pavements of sufficient width so as not to block active travel routes and infrastructure.</p> <p>On sites up to 1km from the sea, plant salt tolerant species such as, but not limited to, Whitebeam or Holm Oak. Hawthorn and Pedunculate Oak are also tolerant of cold exposed sites.</p> <p>Plant tree species which are resilient to hotter summers and wetter winters resulting from climate change.</p> <p>Avoid planting non-native ornamental species within rural settings.</p> <p>Plant trees which have a mature height, spread and canopy height that works with its functional setting, for example avoiding species with low-level branches next to footways and carriageways</p>
Policy links	A2: Housing design principles

Useful resources:

- Natural England's Green Infrastructure Standards (2023) - <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>
- CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments ([ciria.org](https://www.ciria.org))
- Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure (https://naturalengland.blog.gov.uk/wp-content/uploads/sites/183/2022/03/BNG-Brochure_Final_Compressed.pdf)
- Sensory Trust guidance on accessibility (<https://www.sensorytrust.org.uk/uploads/documents/ByAllReasonableMeansEnglandAug2020.pdf>)
- Greater Norwich active environments analysis on green infrastructure and spaces to be released march (but may be pushed back)
- Urban Tree Manual - <https://www.forestresearch.gov.uk/tools-and-resources/fthr/urban-tree-manual/>
- Trees and Design Action Group resources including Trees in Hard Landscapes - a Guide for Delivery - <https://www.tdag.org.uk/trees-planning-and-development.html>
- Active Design Guidance - <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>



Fig. 31. Examples of street tree planting.

Top left: new street trees planted in existing relatively narrow street. Mature trees at the end of the street show the benefit that trees at the scale of buildings can bring in Walthamstow, London

Top right: New street trees in a narrow mews lane street type at Great Kneighton, Cambridge

Middle left: Tall, narrow spread trees can be integrated in narrow urban settings as here in Winnipeg.

Middle right: Trees can make streets feel wider and frame spaces for seating as here in Paris.

Bottom left: Trees provide important shade and greening to larger urban spaces as at Eddington, Cambridge

Bottom right: Large street trees working well with other planting, even close to new homes at Elephant Park, London

4.5 Built form

Development should take an appropriate scale, form and pattern (sometimes referred to as typology) for its site and its function. This means using the site as effectively as possible to create good quality places that are inviting, characterful and active.

Most aspects of built form should be designed with reference to area specific code requirements. In this section, general principles are set out to ensure that development takes an appropriate form for the site, with regard to its location and context.

BF1: Create a scale, form and pattern of development that is structured and integrates with the scale of its context

Required	Demonstrate a clear design rationale for the scale, form and pattern of development through the Design & Access Statement.
Expected	<p>Create a clear hierarchy of landmark and background buildings through scale, form and massing.</p> <p>Ensure the scale and form of development at the site edges is well-integrated with its context and avoids abrupt changes in scale. Care should be taken to relate well to adjacent buildings and avoid extensive flank walls at party wall boundaries.</p> <p>Provide 3D visualisations of the proposal in context and from a variety of viewpoints that are, or will be, publicly accessible, including representation of development during the phasing process where appropriate.</p> <p>Refer to area specific code requirements regarding the form of development that is appropriate to the site.</p>
Policy links	<p>CS1: Focusing on a sustainable future</p> <p>CS9: Encouraging well-designed, distinctive places</p> <p>A2: Housing design principles</p>



Fig. 32. Examples of new buildings integrating well in very different contexts.

Left: housing sits comfortably in a rural context by using local materials, simple forms and hedges to form boundaries to the countryside at Salamanca Farm, Norfolk. Architect: A-Squared.

Right: Clear street pattern and design rationale with considered scale and massing at Goldsmith Street. Architect: Mikhail Riches

BF2: Ensure an appropriate sense of enclosure of streets and public spaces, and clear relationships between public and private space

Expected	<p>Buildings, and their main entrances, should face streets with private areas to the rear of the buildings.</p> <p>Create a visual sense of enclosure with a good relationship between the height and massing of buildings, landscape features (including trees) and the street. Example design approaches are shown in figures 17-23 and should be used as reference.</p> <p>In urban settings, local centres and high streets, the ratio of building heights to street width should be between 1:1 and 1:2. In other locations, the ratio of building heights to street width should be between 1:1 and 1:5. Street trees should be as tall as height of buildings or taller in accordance with the street code example layouts.</p> <p>Development should effectively turn corners at street junctions to avoid long blank walls and non-active frontages.</p> <p>Avoid areas of publicly accessible open space without a clear function.</p> <p>Refer to area specific code requirements for detailed requirements regarding building frontages and boundary treatments enclosing the public realm.</p>
Policy links	<p>CS9: Encouraging well-designed, distinctive places</p> <p>A1: Amenity</p> <p>A2: Housing design principles</p>

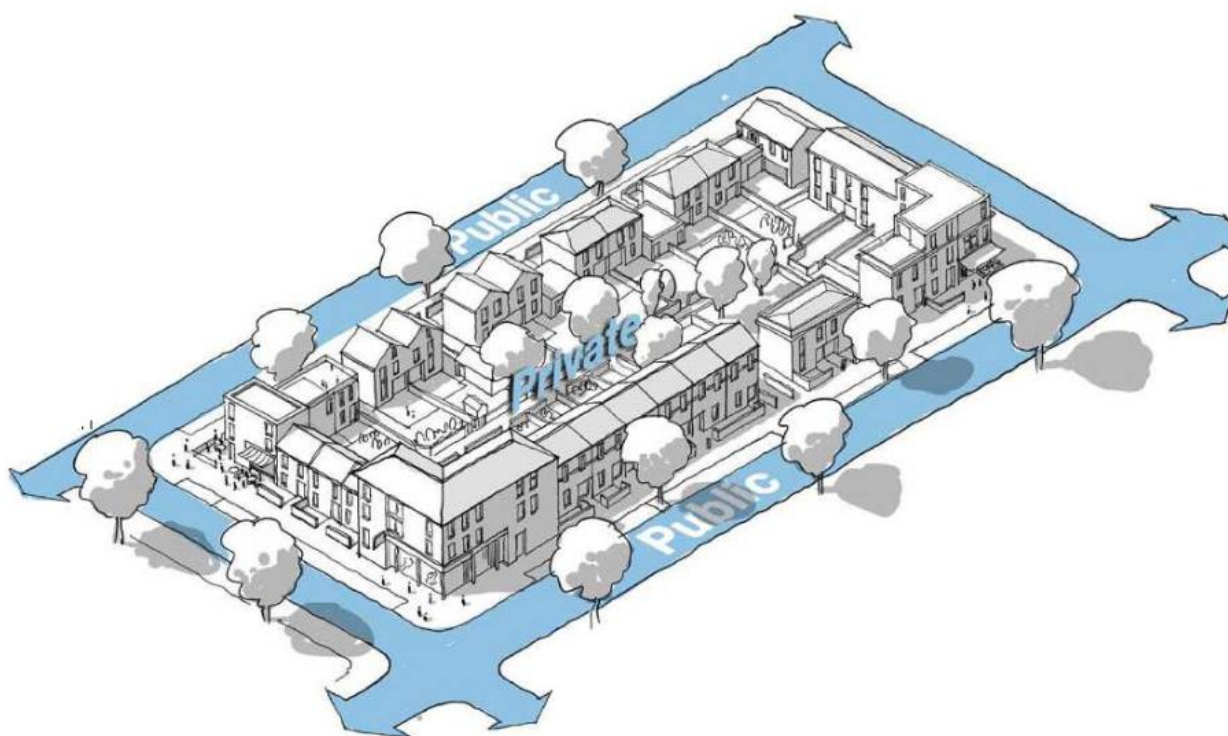


Fig. 33. Diagram from National Model Design Code showing clear enclosure and differentiation between public and private space within a block structure.

	Town centres	Urban neighbourhoods	Suburbs
Primary streets: Designed to take through traffic and public transport See P.1.i Primary Streets	Enclosure Ratio: 1:2 Active Frontage: 30% 25-35m	Enclosure Ratio: 1:2 Active Frontage: 10% 25-30m	Enclosure Ratio: 1:5 Active Frontage: 10% 28-35m
High streets: The focus for local shopping centres, often with traffic but sometimes traffic-free See P.1.i Primary Streets	Enclosure Ratio: 1:1 Active Frontage: 80% 15-20m	Enclosure Ratio: 1:1.5 Active Frontage: 70% 17-23m	Enclosure Ratio: 1:3 Active Frontage: 60% 17-22m
Secondary streets: Taking local traffic into neighbourhoods and often the location of shopping parades and local services such as shops See P.1.ii Local and Secondary Streets	Enclosure Ratio: 1:1 Active Frontage: 50% 13-16m	Enclosure Ratio: 1:1 Active Frontage: 30% 13-16m	Enclosure Ratio: 1:3 Active Frontage: 20% 17-22m
Local streets: Providing vehicle access only to the properties on the street but with through pedestrian and cycle traffic See P.1.ii Local and Secondary Streets	Enclosure Ratio: 1:1 Active Frontage: 30% 10-14m	Enclosure Ratio: 1:1 Active Frontage: 0% 11-14m	Enclosure Ratio: 1:2.5 Active Frontage: 0% 14-18m

Fig. 34. Diagrams from National Model Design Code showing suggested ratios of building height to street width for different street types and different neighbourhood types. A site specific approach should be taken to establish the most appropriate enclosure ratio, with reference to area specific code requirements and Streets and Movement section of the design code.



Fig. 35. Good design creates successful enclosure of streets and public spaces, and ensures corners are turned without blank flank walls.

Left: Goldsmith Street, Norwich. Architect: Mikhail Riches

Right: Channels, Chelmsford, Essex. Architect: JTP.

BF3: Make efficient and effective use of land through designing to appropriate residential densities and plot ratios

Required	Identify, through contextual analysis and options appraisal, the most appropriate development form and mix of uses that optimizes the capacity of the site with regard to its location and context. This must be demonstrated through the material submitted for all applications, including outline applications.										
Expected	<p>Follow a design-led approach to achieving an appropriate density of development for the site. The indicative minimum housing densities for residential developments, set out in the adopted Local Plan, are:</p> <table border="1"> <thead> <tr> <th>Location – settlement(s)</th><th>Net minimum housing density (dwellings per hectare)</th></tr> </thead> <tbody> <tr> <td>Great Yarmouth Town Centre & Gorleston-on-Sea Town Centre, and edge of centre locations</td><td>50</td></tr> <tr> <td>Elsewhere in the settlements of Great Yarmouth, Gorleston-on-Sea & Bradwell</td><td>35</td></tr> <tr> <td>Caister-on-Sea, Belton, Hemsby, Hopton-on-Sea, Martham, Ormesby St Margaret and Winterton-on-Sea</td><td>30</td></tr> <tr> <td>Elsewhere in the Borough</td><td>20</td></tr> </tbody> </table> <p>Justify the actual proposed density for the development through a contextual assessment of density and development pattern (typology) within the Design & Access Statement . The area used for the density calculations, and for any areas used for comparison, must be clearly shown within this assessment.</p> <p>For the purpose of density calculations, the relevant net site area should be measured to the rear of each plot and to the centre line of roads surrounding the site, whether they lie within the application boundary or not. Areas of substantial public open space, whether inside or adjacent to the site, should be excluded. Incidental open space (e.g. verges) should be included within the area calculation.</p> <p>The following measurements of density should be provided for all planning applications that include new residential units:</p> <ul style="list-style-type: none"> • number of dwelling units per hectare • number of habitable rooms per hectare • number of bedrooms per hectare • number of bedspaces per hectare <p>Plot ratios (the ratio between the site area and the total building floor area) and plot coverage (the proportion of the site area occupied by buildings) should be stated for mixed-use and commercial development. Plot ratios of over 2 are expected in town centre locations; between 1-2 in urban neighbourhoods; and between 0.5-1 in suburban/ rural locations.</p>	Location – settlement(s)	Net minimum housing density (dwellings per hectare)	Great Yarmouth Town Centre & Gorleston-on-Sea Town Centre, and edge of centre locations	50	Elsewhere in the settlements of Great Yarmouth, Gorleston-on-Sea & Bradwell	35	Caister-on-Sea, Belton, Hemsby, Hopton-on-Sea, Martham, Ormesby St Margaret and Winterton-on-Sea	30	Elsewhere in the Borough	20
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Caister-on-Sea, Belton, Hemsby, Hopton-on-Sea, Martham, Ormesby St Margaret and Winterton-on-Sea	30										
Elsewhere in the Borough	20										
Policy links	H3: Housing density										



Fig. 36. Diagram from the National Model Design Code showing how to measure site density. Note that the area boundaries go to the centre-line of streets and to the rear of plots, and do not include significant areas of public open space. Area A has a higher density than area B.

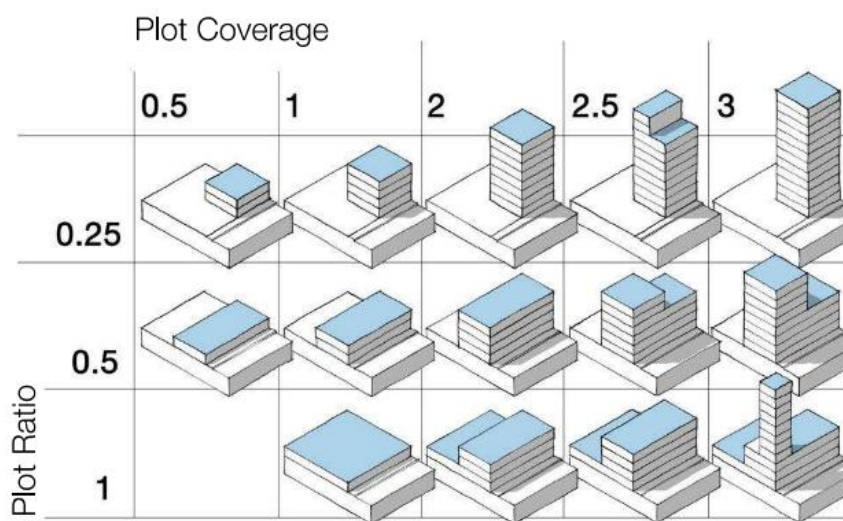


Fig. 37. Diagram from the National Model Design Code showing plot ratio and plot coverage. Plot ratio is the ratio between site area and the total building floor area while plot coverage is the proportion of the site area occupied by buildings.

BF4: Ensure building form and layout are optimized with regard to solar orientation, overshadowing and wind

Expected	<p>Design building massing and layout to optimize daylight and passive solar gains for internal spaces.</p> <p>Ensure building forms do not inappropriately overshadow public open space while providing shading where appropriate to reduce the urban heat island effect.</p> <p>Use building forms to shelter streets and public spaces from wind, and to avoid wind tunnel effects</p> <p>See also CC2: Minimise active heating and cooling requirements through passive design and CC8: Reduce urban heat island effect</p>
Best practice	<p>Evidence compliance with Passive House standards</p> <p>Evidence compliance with a TM59 overheating assessment</p>
Policy links	A1: Amenity

Useful resources:

- Resources listed in the Context and Identity section are relevant here.

4.6 Building design

Many aspects of building design should be developed with reference to area specific code requirements. In this section, borough-wide requirements and standards are set out that apply across all area types, and to new development of all kinds.

BD1: Create active frontages to the public realm

Expected	<p>Ensure frontages to streets and public spaces include the main entrances to the surrounding buildings, and windows/glazing providing a visual connection and passive overlooking of the public realm.</p> <p>Avoid frontages dominated by garage doors or service doors. Where non-habitable space is required due to flood risk, blank elevations must be avoided. Ground floors should be used for appropriate functions which can include entrance lobbies, workspace, commercial units, shared resident facilities such as cycle storage, utility rooms or bookable meeting/party rooms, as well as garage and refuse storage. Garage and refuse storage should not dominate street elevations.</p> <p>Ensure the design of relevant commercial frontages complies with the Shopfront Design Guide SPD³.</p>
Policy links	<p>CS9: Encouraging well-designed, distinctive places</p> <p>A2: Housing design principles</p>

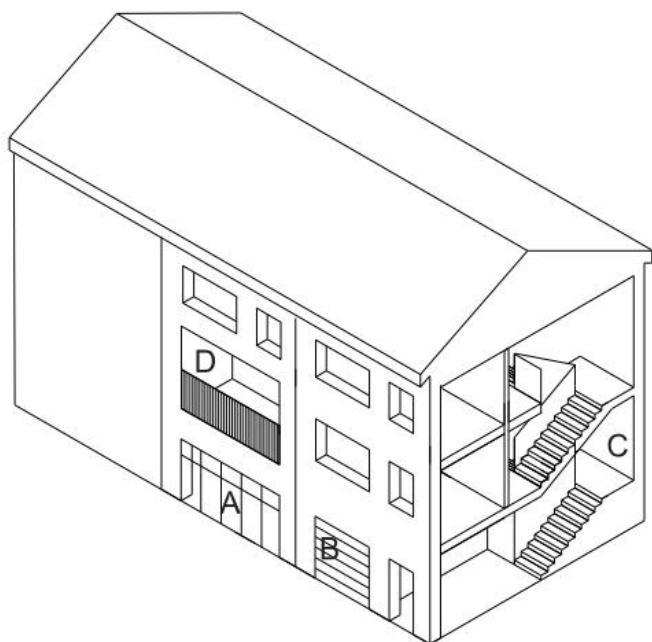


Fig. 38. Diagram showing how to maintain active frontages for development within Flood Zone 3.

A Ground floor rooms below flood datum can be used for active uses such as workspace, utility space, or shared resident facilities.

B Use of ground floor space for carports/garages is acceptable provided this does not dominate i.e. is alternated with other active ground floor uses.

C Internal stairs to habitable space above flood datum. Internal stairs are safer than external stairs for residents and visitors as they provide a dry, enclosed entrance.

D Consider provision of balconies to provide outdoor amenity space which is directly accessible from habitable rooms.

BD2: Ensure tenure-blind housing development.

Expected	Ensure there is no visual difference, when seen from the public realm, between the design of homes for private sale, private rent, affordable rent or shared ownership.
Policy links	CS4: Deliverable affordable housing

BD3: Create functional and accessible new homes with sufficient internal space.

Expected	Meet the M4(2) standard (accessible and adaptable) within Part M of the Building Regulations ⁴ , for all new homes unless impractical, for example due to site topography or flood risk. For homes within Flood Zone 3, where habitable spaces cannot be provided on the entrance storey, include lift access, or internal staircases which are sized to permit the installation of a stairlift if required, from street level to habitable spaces above the flood datum. Include space for home-working within dwellings, which can be through demonstrating that dedicated desk space can be accommodated within room layouts.
Best practice	Meet the Nationally Described Space Standards (NDSS) for the internal spaces within dwellings. Meet the M4(3) standard for 10% of all new homes.
Policy links	A2: Housing design principles

BD4: Ensure adequate daylight and sunlight for new homes, and no unacceptable loss of daylight or sunlight to neighbouring existing homes.

Expected	Follow the approach set out in the BRE document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2022) ⁵ . If a full daylight and sunlight assessment is not undertaken, ensure that the 25 degree rule of thumb is used.
Best practice	Daylight and sunlight report to be submitted demonstrating compliance with BS EN 17037
Policy links	A1: Amenity

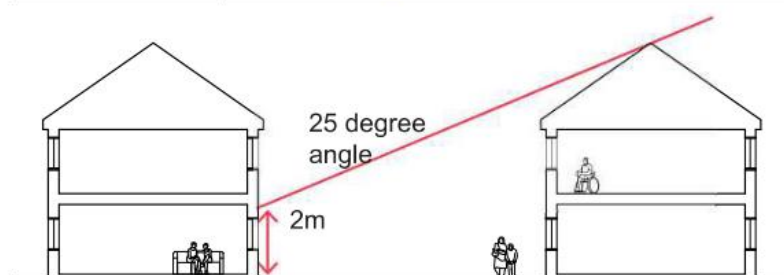


Fig. 39. Diagram showing the application of the 25 degree rule of thumb regarding overshadowing.

Windows are likely to receive adequate diffused daylight if no obstructions exist above a line at 25 degrees from a point 2m above floor level at the facade.

If closer spacing of buildings is desired:

- Include windows on both sides of the room
- Raise window head-heights and keep rooms shallow in plan.
- Ensure projections in plan do not project more than 45 degrees past the line of the window.

4 Building Regulations Part M - <https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m> [Page 390 of 666](#)

5 <https://www.brebookshop.com/details.jsp?id=328056>

BD5: Ensure adequate privacy for habitable rooms (living rooms, dining rooms, kitchens or bedrooms) and private outdoor amenity space

Expected	<p>When rear-facing or side-facing windows into habitable rooms are directly opposite each other, ensure a minimum separation of 20m unless windows are obscured or a fence or other visual barrier of above eye-level height (as viewed from the potential vantage point) is designed in.</p> <p>Where unobscured rear windows face each other at an angle of more than 30°, the minimum spacing may be reduced to 15m from the nearest corner.</p> <p>Where living rooms are located above ground level, rear-facing windows should be a minimum of 30m from rear-facing windows into habitable rooms of any other dwelling.</p> <p>The distances above can be reduced, and the requirement for above eye level screening, if careful building and landscape design ensures overlooking will not occur, or for apartments overlooking shared private amenity space.</p>
Policy links	A1: Amenity

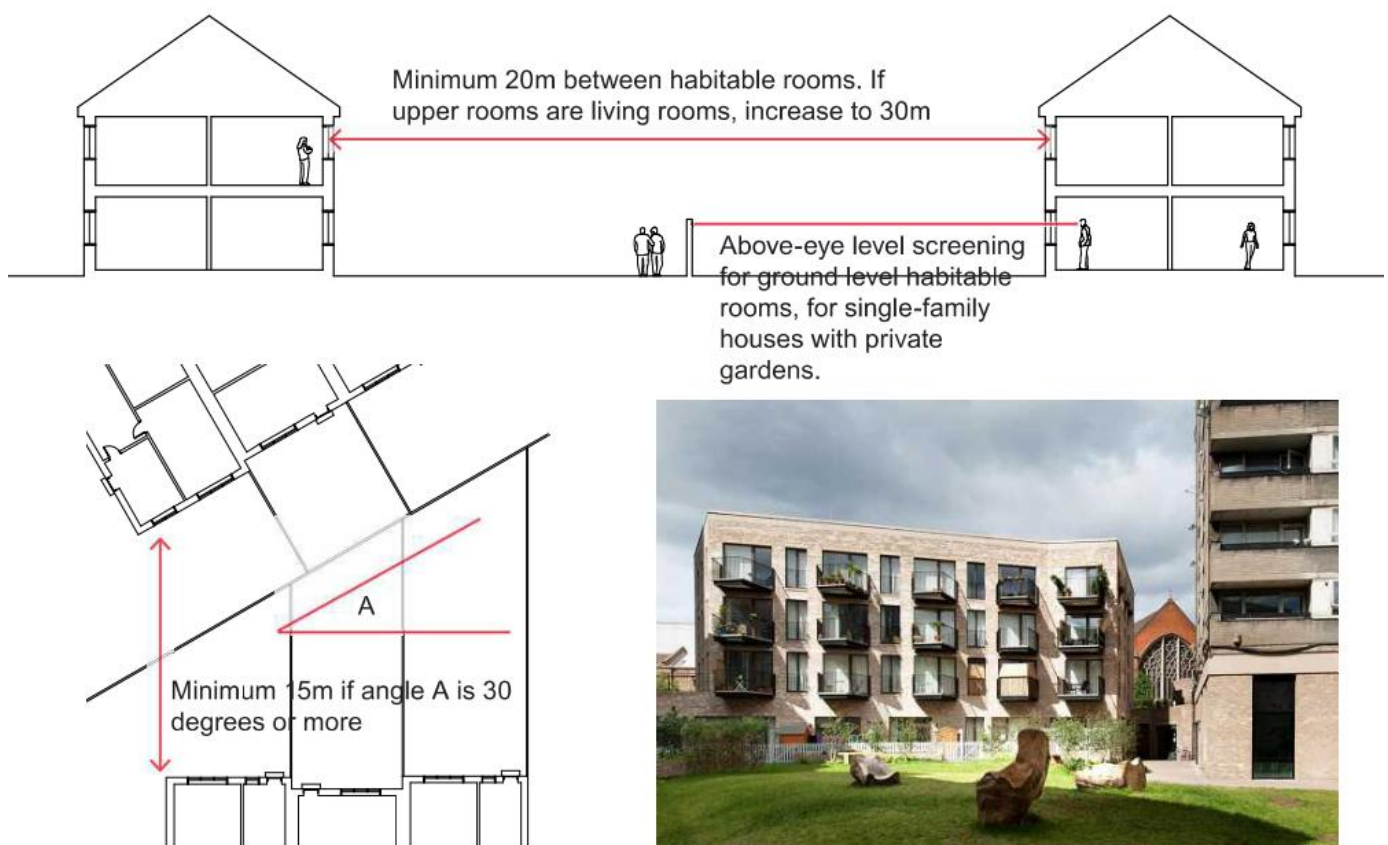


Fig. 40. Diagrams showing parameters for privacy at the rear of new homes and example of apartment building where above-eye-level rear screening is not required, and distances can be reduced, for rear windows and balconies overlooking shared private amenity space, at the Silchester Estate (Architect: Haworth Tompkins)

BD6: Provide sufficient quality and quantity of private outdoor amenity space for residential development

Expected	<p>Dwellings with living areas at ground level must have direct access to one of the following:</p> <ul style="list-style-type: none"> • Private gardens to detached or semi-detached homes - 40m² minimum (for 1- or 2-bed homes), 75m² (for 3-bed homes), 100m² (for 4 bed homes or larger). Gardens to be a minimum of 5m wide and garden space to be provided in a single block, not split between front and rear. • Private walled outside courtyard gardens – 25m² minimum, suitable only for higher density development forms such as terraces or ground floor flats/maisonettes within apartment buildings. • Shared communal gardens/courtyards - 25m² minimum per dwelling <p>Dwellings with living areas above ground level should have a balcony or terrace of at least 5m² for a one-bedroom home, with an additional 1m² per additional bedroom. Balconies must have a minimum depth of 1.5m.</p> <p>Dwellings with living areas above ground level should have access to ground level shared communal garden/courtyard space with a minimum of 25m² per dwelling, unless good quality public open space is accessible within a 1 minute walk.</p> <p>Specialist housing, including older people's housing, is not required to meet these requirements but should demonstrate that adequate good quality, accessible and functional outdoor amenity space is provided for residents.</p> <p>All private amenity space should receive direct sunlight for at least four hours a day in June, and at least 60% of its area must receive direct sunlight on 21 March, as demonstrated through a sunlight analysis.</p> <p>Design private amenity space to have sufficient privacy for users and to be away from sources of noise and poor-quality air. Inset balconies provide better privacy, security, shade and shelter for residents than projecting balconies, as well as contributing to preventing internal overheating.</p>
Best practice	No more than 25% of the private amenity space should be prevented by buildings, walls or fences from receiving sunshine on 21 March.
Policy links	CS9(i): Encouraging well-designed, distinctive places

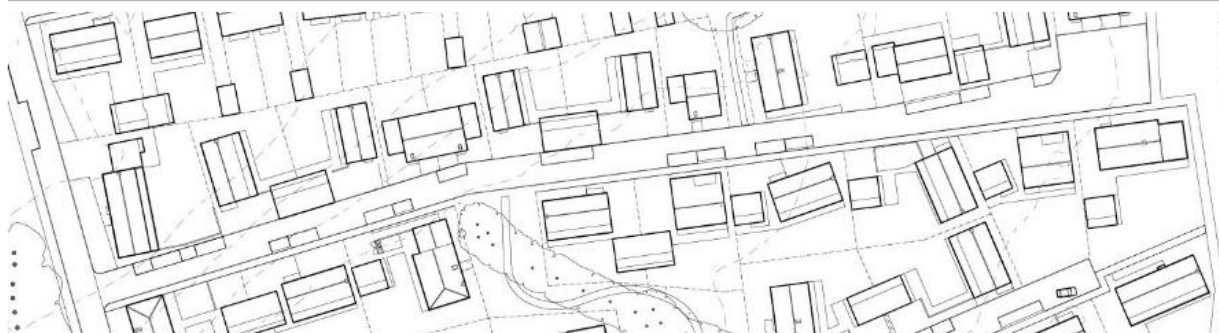


Fig. 41. Good site planning and a legible layout ensures evenly sized, useable gardens for units, with good rear privacy, at a range of sizes at the Humberston Par 3 development, Lincolnshire. Architect: Jonathan Hendry

BD7: Provide convenient and discreet refuse storage and utilities to meet user requirements.

Expected	<p>Provide residential refuse storage areas that meet the requirements of the local waste collection service.</p> <p>Demonstrate that commercial development proposals include adequate space for refuse storage and collection.</p> <p>Provide refuse storage areas that are enclosed, secure and visually attractive, and user-friendly, integrated with the site and building design. Refer to area specific code requirements for recommended locations of refuse storage to suit area character and development pattern.</p>
Policy links	A1: Amenity



Fig. 42. Refuse stores can become design features that add to the character and identity of new housing development as at Exhibition Mews, Whitehaven, Cumbria. Architect: Ash Sakula

BD8: Screen external plant and equipment from views from the public realm and from the upper floors of listed buildings.

A1: Amenity	<p>Use parapets and roof forms to screen plant, including air source heat pumps and ventilation equipment, located at roof level.</p> <p>Enclose ground level plant within attractive and secure screening that is integrated with other landscape and building treatments, and visually unobtrusive.</p> <p>Locate utility and meter boxes in unobtrusive locations which are visually screened and not on primary elevations.</p> <p>Drawings to be submitted that demonstrate that plant will be screened from the required viewpoints.</p>
Policy links	A1: Amenity



Fig. 43. Examples of well designed air source heat pump screening at Marmalade Lane, Cambridge. Architect: Mole Architects

BD9: Use boundary treatments that contribute positively to the character of the public realm and wider landscape.

Expected	<p>Design and specify durable and attractive boundary treatments which balance safety and crime reduction with creating well-overlooked, attractive places that encourage a sense of community.</p> <p>Ensure natural surveillance to streets and public spaces by limiting boundary treatments to the front of buildings to below 1m in height.</p> <p>Do not use close boarded fences for boundary treatments to the public realm or adjoining undeveloped land/countryside.</p>
Policy links	A2: Housing design principles



Fig. 44. Good quality boundary treatments, including to rear and side boundaries, are durable, attractive and complement the landscape setting. Example: Great Kneighton, Cambridge. Architect: Proctor Matthews

BD10: Provide external lighting which minimises light pollution while ensuring safety.

Expected	<p>Where external lighting is required, design lighting, and its controls, to preserve dark skies and avoid excessive light pollution.</p> <p>Provide adequate external lighting to ensure users of buildings and spaces, including more vulnerable user groups, feel safe at night, without contributing to light pollution.</p>
Policy links	A1: Amenity E6: Pollution and hazards in development

BD11: Design appropriate deterrents to nuisance bird nesting and roosting

Expected	<p>Consider how building form and design can deter nuisance bird nesting and roosting, such as by seagulls and pigeons, while creating habitat for threatened species such as swifts, swallows and house martins.</p> <p>Where deterrents are necessary, ensure they are visually discreet and minimally visible from the public realm.</p>
Policy links	A1: Amenity

Useful resources:

- Birkbeck D and Kruczkowski S et al (2020) Building for a Healthy Life - <https://www.designforhomes.org/project/building-for-life/>
- Great Yarmouth refuse storage requirements - link TBC
- BRE document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2022) - <https://www.brebookshop.com/details.jsp?id=328056>
- Institute of Lighting Professionals Guidance Note 1: reducing obtrusive lighting through design (<https://theilp.org.uk/category/ilp-guidance-notes/>)

5. Area specific design requirements

Great Yarmouth borough includes a wide variety of settlement types and development patterns. Each has specific characteristics which make it distinctive, and it is important that development proposals show that these characteristics have informed their layout and design.

To assist with this, the Design Code has set out the broad character areas and character types that can be found in the borough. This is a high level characterisation and should be used as a starting point for detailed, site specific character assessment as part of preparing development proposals.

Character areas are defined zones which have specific characteristics not found elsewhere in the borough. These have unique features and development proposals should carefully respond to, and enhance, this distinctive local character.

Character types are development forms or patterns which are found in various locations within the borough. Areas that share a character type have similar characteristics, and similar design approaches will be appropriate.

For all character areas and types, the design code sets out:

- Maximum / minimum densities / plot ratios (to be read in conjunction with [BF3](#))
- Development pattern (to be read in conjunction with [BF1](#), [BF2](#) and [BF4](#))
- Building line (to be read in conjunction with [BF2](#))
- Height and massing (to be read in conjunction with [BF1](#))
- Cycle and car parking (to be read in conjunction with [SM4](#) and [SM5](#))
- Servicing (to be read in conjunction with [SM6](#) and [BD7](#))
- Street elevation design (to be read in conjunction with [CI4](#), [BD1](#))
- Boundary treatments (to be read in conjunction with [BD9](#))
- Building design and materials (to be read in conjunction with [CI4](#))
- Landscape design and materials (to be read in conjunction with [CC7](#), [CC8](#), [PS1-5](#))
- Other relevant aspects of design and development that are specific to the character area or area type.

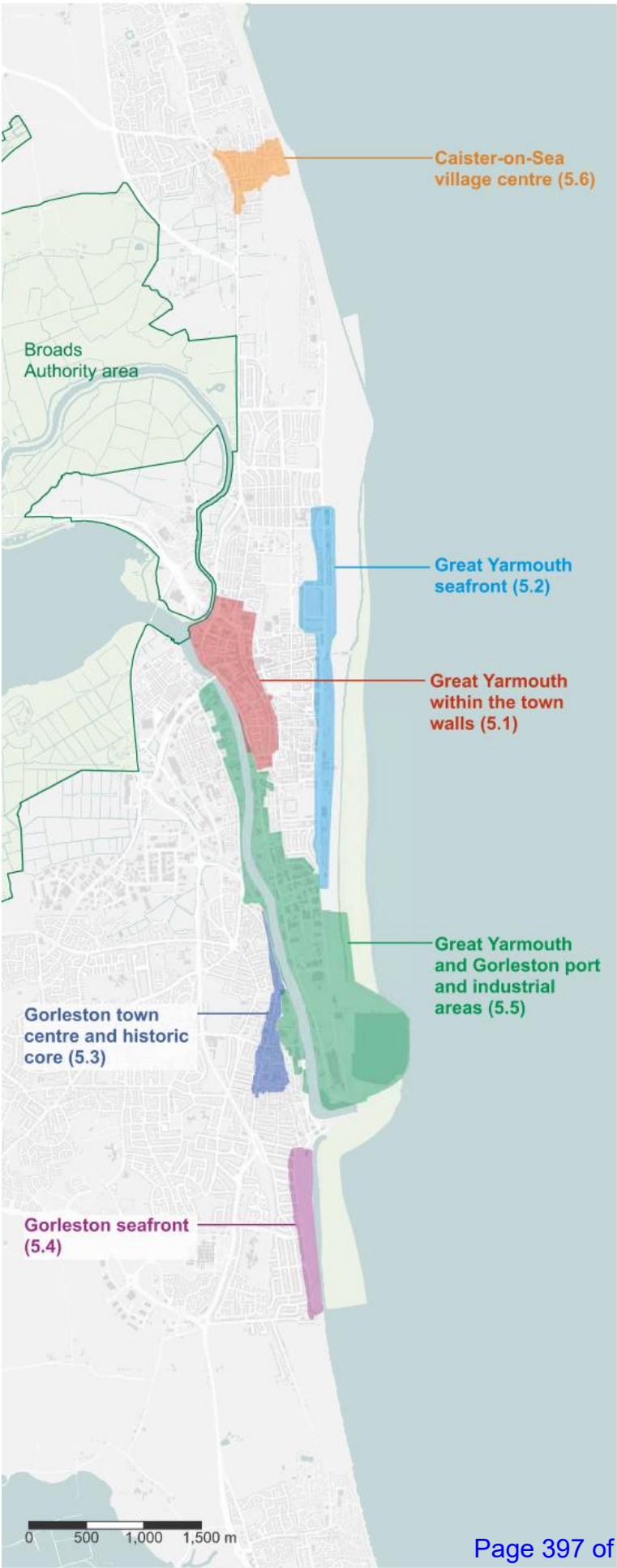


Fig. 45. Map of character areas within the borough. Area types are not shown.

Character areas

5.1 Great Yarmouth, within the town walls

To be read in conjunction with relevant Local Plan policies including those shown on figure 49.

The area within the medieval town walls of Great Yarmouth is of high historic significance, with a high density of listed buildings surrounded by the Scheduled Ancient Monument of the Town Wall, and including several Conservation Areas.

A number of site specific Local Plan policies and Supplementary Planning Documents are relevant to this character area, and these should be fully read and referenced in relation to any development proposals at any scale.

Area characteristics:

Central area (between St Francis Way and Yarmouth Way)

- The central area includes the remains of the tight pattern of east-west Rows, spanning between the north-south streets. This pattern – unique to Gt Yarmouth – was subject to extensive demolition and redevelopment from the 1930s onwards, which has left unattractive surface car parks and service yards particularly on either side of Howard Street and Greyfriars Way.
- Scale of buildings ranges from 2-8 storeys, with most buildings in the 3-6 storey range. Many buildings have attic storeys within pitched roofs (room in the roof) or mansard attic storeys set behind parapets.
- A wide range of building forms and styles is in evidence, due to the change and development/redevelopment the central area has seen over time.
- Buildings are predominantly faced in brick, stone and flint. The Victorian architecture includes ornamented brick and terracotta/faïence detailing with a strong and distinctive civic quality, while older brick and flint buildings have an affinity with the wider Norfolk material palette of villages and smaller settlements.

Area between St Francis Way, King Street and Friars' Lane

- In this area, the Row pattern was replaced with relatively low-density housing as well as commercial and industrial development, in a broadly gridded pattern but with generous gardens and green spaces.
- Buildings are typically 3 storeys, in apartment blocks or terraces set back behind front gardens, with private gardens and parking courts in the block interior.
- Some of the housing is good quality and attractive 1930s, 1940s and 1950s stock with attractive period details, such as brickwork and tilework patterns and decorative balcony guarding, and good internal space standards. The replacement of original windows with uPVC has been to the detriment of the external appearance of this housing.

South of Friars' Lane

- At the far south of the character area, industrial and commercial development has a low plot density and several empty plots, but some very good quality 1930s buildings including the Clipper Schooner.

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Generally:

- The landscape setting of the Town Wall is in poor condition in many places and is not publicly accessible along all its length.
- The set-piece waterfront vista survives in relatively good condition for much of the area but is of poor quality towards the north and the south.

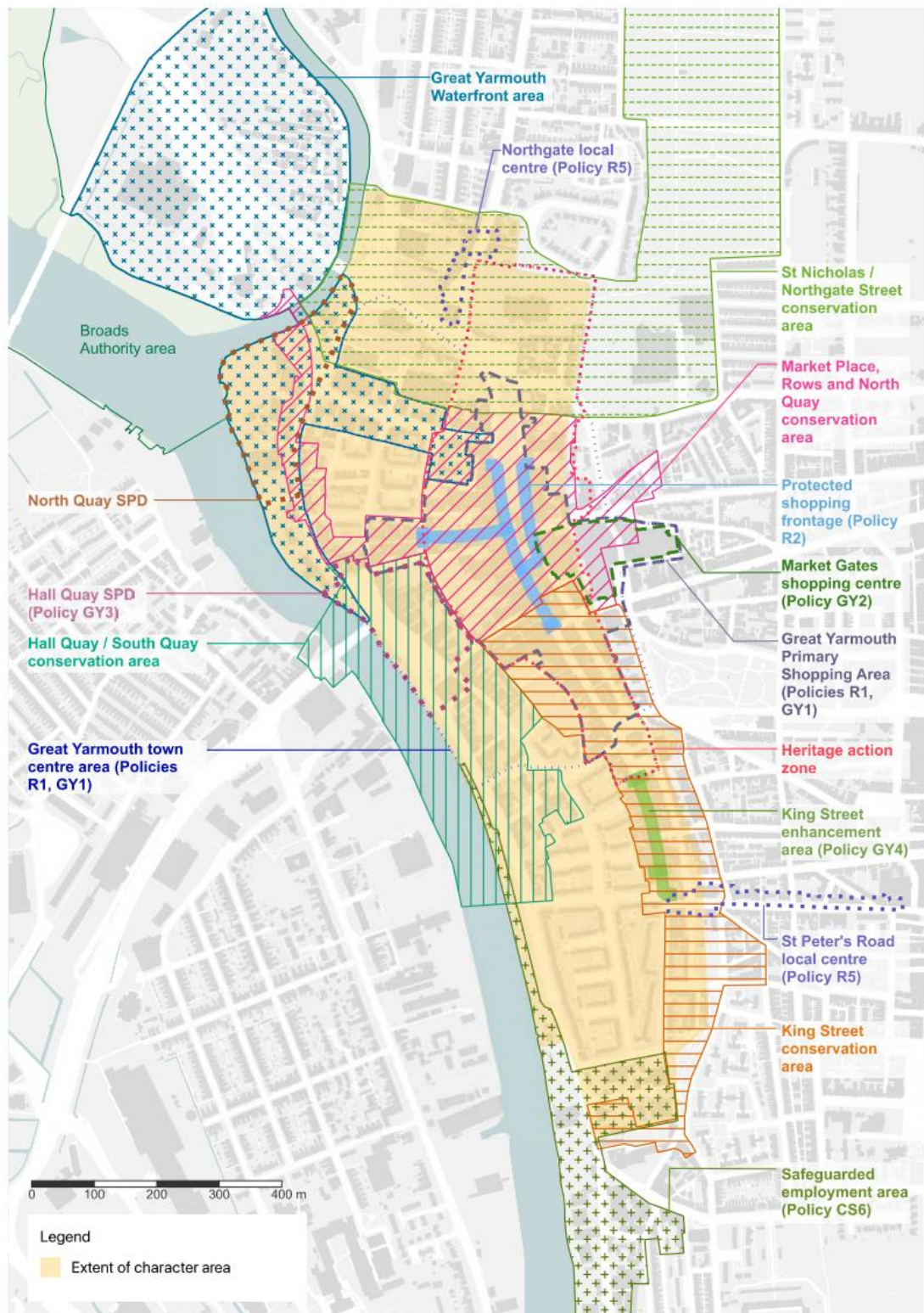


Fig. 46. Map of character area

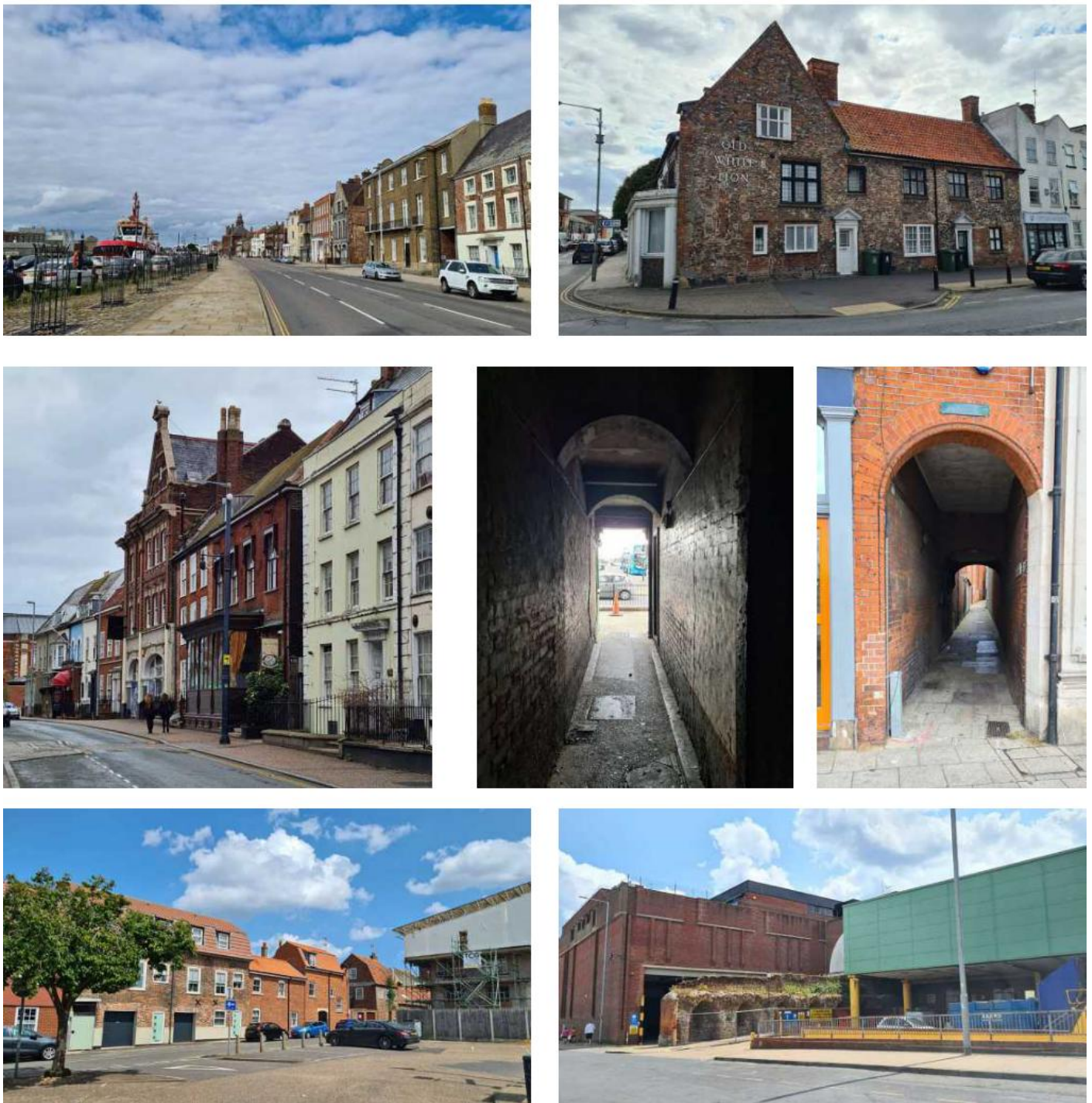


Fig. 47. Photos showing character of Great Yarmouth town centre.

Top left: South Quay and the waterfront. Currently somewhat dominated by vehicle traffic, this should improve with the opening of the third river crossing. The Georgian waterfront is mainly of brick.

Top right: Brick and flint forms the distinctive palette of the pre-18th century town, and of many later vernacular buildings.

Middle left: the north-south streets, such as King St, are relatively wide and have generally formal frontages to a consistent building line.

Middle right: The 'Rows' historically ran east-west and were extremely narrow - a few still survive.

Bottom left: Some well-restored and sensitively infilled streets remain, with new development and adaptation of existing buildings using traditional materials such as brick, pantiles and timber, but car parks disrupt the historic row pattern.

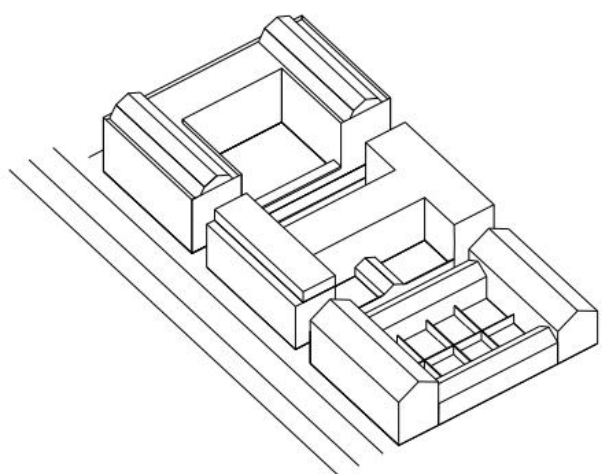
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Bottom right: The town wall setting is very poor in many areas.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Minimum 50 dwellings per hectare for residential-led development, with the expectation of higher densities of up to 150dph Plot ratios for mixed-use development of 2 or over.
Development pattern (see also BF1 , BF2 and BF4)	Reinforce the rectilinear grid pattern, with active frontages on all sides. New east-west streets can be created but new north-south streets or paths should be avoided.
Building line (see also BF2)	Central area and south of Friars Lane: Continuous built edge to the back of pavement/public realm. Variation from the building line of adjoining buildings should be under 1m. On street-facing elevations, balconies should be inset not projecting. Area between St Francis Way, King St and Friars' Lane: Buildings should follow the prevailing building line which is generally set back from pavement behind planted front gardens or well-landscaped parking.
Height and massing (see also BF1)	Predominantly 3-5 storeys. Occasional taller buildings where appropriate on waterfront sites and to form visual landmarks where existing important views will not be negatively impacted. Two-storey development is not generally appropriate for the urban character of this area. Central area: varied roof forms are acceptable, including mansard roofs, parapets with flat or mansard roofs behind, pitched and gabled roof forms. South of St Francis Way: Roof forms and massing should reinforce a consistent parapet or eaves line for the majority of the street.
Cycle and car parking (see also SM4 and SM5)	Provide a high ratio of cycle storage and parking provision, and a low ratio of car parking, due to excellent public transport, walking and cycling connections. Car free development is encouraged. Cycle parking and storage for residents and employees to be provided within building envelope or within the block interior. Car parking to be provided within the block interior, or in basement parking. For apartment and mixed use development, parking should be unallocated and include provision of car club spaces. Residential garage entrances are acceptable at ground floor level, designed to avoid unbroken runs of garage doors.
Servicing (see also SM6 and BD7)	Refuse storage to be provided within building envelope or within the block interior.
Street elevation design (see also CI4 , BD1)	Elevations should have a regular rhythm, unless clearly justified by the architectural concept. Where non-habitable space is required due to flood risk, blank elevations must be avoided – refer to BD1 for further guidance. New shopfront designs should be in accordance with the Shopfronts Design Guide

Boundary treatments (see also BD9)	<p>Central area and south of Friars' Lane: buildings should form the boundary to the street and public realm. Where service yards or courtyards abut the street, they should be bounded by solid walls to 2m minimum, in high quality materials e.g. brick or flint.</p> <p>Area between St Francis Way, King Street and Friars' Lane: On frontages, good quality brick or flint walls or metal railings (up to 1m high), or hedges/planted boundary treatments. For side boundaries to rear gardens, good quality brick or flint walls (up to 2m high) or hedges.</p>
Building design and materials (see also CI4)	<p>External façades should typically be well-detailed and high quality brick, flint, stone or traditional lime render. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Achieving the urban greening factor is likely to require the use of green roofs and climbing plants as well as landscape design.</p>
Landscape design and materials (see also CC7 , CC8 , PS1-5)	<p>Waterfront regeneration should enhance the landscape setting of the waterfront through tree planting, more seating and active uses and installation of soft landscape SuDS features. More space for pedestrians/cyclists should be created and the impact of vehicles reduced.</p> <p>Create public access to the full length of the Town Wall on both sides, where physically feasible, with associated public realm and landscaping which can include active uses (play, outdoor seating, outdoor gym, café seating sport and recreation).</p> <p>Existing and new public spaces should support a wide range of activities as well as forming part of the SuDS network and enhancing biodiversity.</p> <p>Additional street planting, of trees that will mature to provide good canopy spread and height, should be included where possible.</p> <p>Landscape design of privately managed areas should incorporate SuDS features including rain gardens and permeable paving.</p>
Other	For redevelopment on North Quay and Hall Quay, refer to the adopted Supplementary Planning Documents. ¹



a) Courtyard arrangements should be oriented to maximise daylight and maintain adequate privacy between rear facing windows. A hard 'garden wall' to the 'row' can provide access to cycle parking within the courtyard. Car parking at low ratios can also be located within courtyards and accessed from the main streets.

b) Mews arrangements with small private courtyard gardens are the typical historic pattern of development along the rows, and still works today to create a low-rise high-density townscape.

Fig. 48. Diagram showing possible design approaches for dense town centre blocks maintaining 'rows' pattern of narrow pedestrian lanes between main streets while accommodating buildings of up to 6 storeys.

5.2 Great Yarmouth seafront

To be read in conjunction with relevant Local Plan policies including those shown on figure 50.

The seafront character area stretches from Jellicoe Road in the north to Main Cross Road in the south. It includes the buildings and landscapes on both sides of the seafront road (Marine Parade, North Drive) and includes the major tourist destinations of Great Yarmouth as well as the beach itself. Part of the character area is covered by the Seafront Conservation Area and site specific policies in the Local Plan also apply to parts. These should be fully read and referenced in relation to any development proposals at any scale.

Marine Parade and North Drive form a wide, continuous road that separates the seafront from the town and creates a set-piece vista that is emblematic of Great Yarmouth. The vista evolves from north to south and several distinct zones can be identified.

Area characteristics:

North Drive

- At this end of the seafront, the beach forms a wide and undeveloped shingle and sand expanse with marram grass. At points the sea is nearly 500m from the road.
- On the town side, 1930s housing is set back behind an access road, with a grassed strip separating the access road from North Drive. Homes have a strong and relatively unaltered 1930s character with steep pitched roofs accented with gabled projecting wings, symmetrical arrangements in groups of two to four homes, and low brick boundary walls to generous front gardens matching the brown-red brickwork of the homes themselves. Due to the exposed position there are few mature trees and front gardens are relatively sparsely planted. Front gardens are largely unaltered and have not, in the main, been converted to parking.
- Further south, newer homes, mostly detached and on generous plots, front directly onto North Drive and include a wider variety of styles, from 1950s to recent newly developed homes. Many have first floor balconies over garages at ground level. Homes are almost all two-storey, with some roof dormers providing a third storey. Low boundary walls to the street with most front gardens including some off-street parking. Some homes have attractive period features that add character, such as geometric balustrades to balconies, bay windows and feature chimneys.
- Further south, the Venetian Waterways is located on the beach side of North Drive, and is faced on the other side of the road by a continuation of the detached villa typology, many of which are three-storey and are now, or were originally designed, as hotels or inns. Arts and Crafts details predominate, with half-timbering, hung tilework, feature chimneystacks and strong projecting eaves to tiled pitched roofs, under which bay windows provide panoramic sea views.
- Between the Venetian Waterways and the Pier, car parks alternative with bowling greens between North Drive and the beach and the scale of building on the town side starts to become more varied with some large and imposing hotels.

Marine Parade / South Beach Parade

Most of this part of the seafront lies within the Seafront and Camperdown Conservation Area. The following is a high level summary of the characteristics of the conservation area.

- On the beach side, visitor attractions, many of historic merit, are set within distinct plots and have a set-piece, often sculptural character designed to be eye-catching at a distance. Buildings on the beach side of Marine Parade have extremely varied styles and scales, and this forms a distinctive resort character. Attractions alternate with surface car parks.
- On the town side, there is a continuous built frontage including many characterful and elaborate buildings, with bold shopfronts at ground floor level. Upper floors typically have projecting bays and balconies, and are mainly painted stucco or brick, often with well-preserved original balconies and windows and other details. The scale of buildings ranges from two to six storeys.
- Service yards and alleys to the rear of buildings are of mixed quality.
- From Camperdown to Kings Road the west side of the parade changes character to Regency terraces and large, neo-classical villas with a relatively unaltered period character set back behind landscaped gardens.
- South of Kings Road, the west side of the road reverts to detached two-and three-storey 20th century homes with similarities to the North Denes area, with a large surface carpark interrupting the frontage.



Fig. 49. The seafront area from above

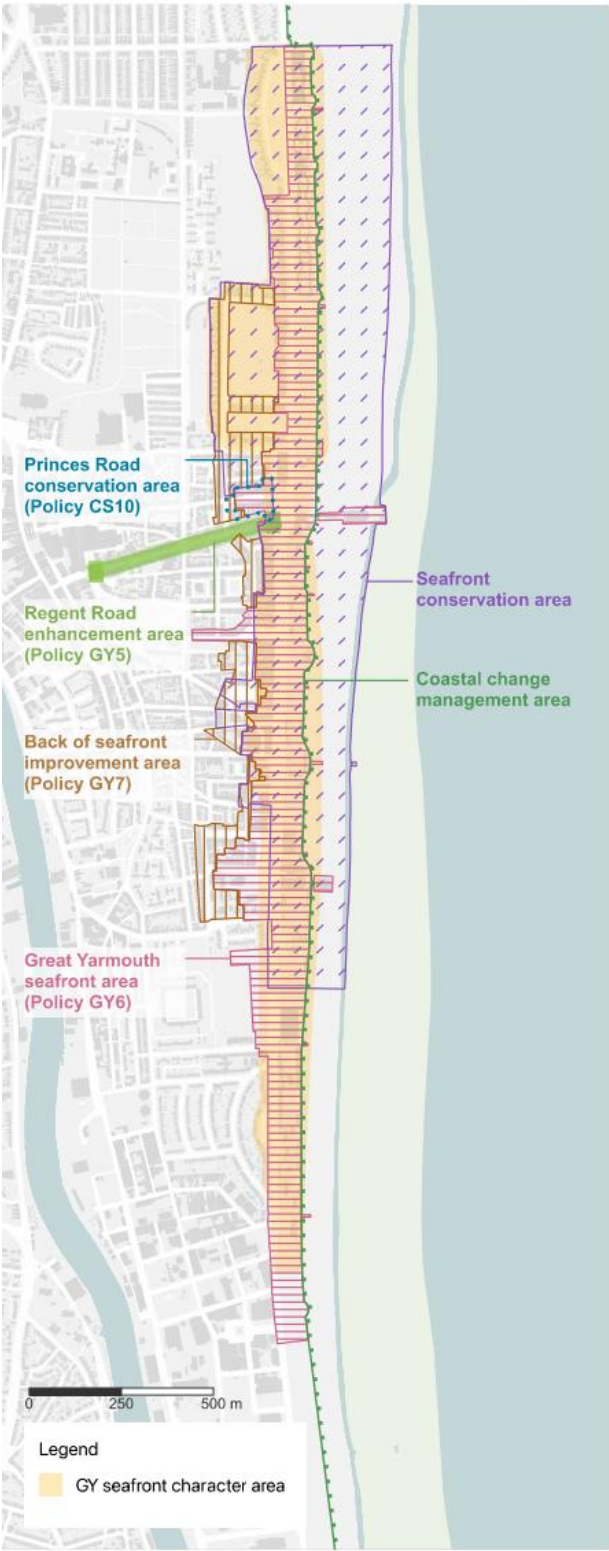


Fig. 50. Map of character area



Fig. 51. Photographs of the Great Yarmouth seafront area.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	<p>North Drive: Minimum 35 dwellings per hectare.</p> <p>Rest of the character area: Minimum 50 dwellings per hectare for residential-led development, with the expectation of higher densities of up to 120dph</p> <p>Plot ratios for mixed-use development of 2 or over.</p>
Development pattern (see also BF1 , BF2 and BF4)	<p>North Drive: detached, semi-detached and short terraced homes facing the street</p> <p>Marine Parade/South Beach Parade (west side): urban perimeter blocks with unbroken street frontages, terraces, garden squares and setpiece villas facing the street. All street elevations must be active frontages.</p> <p>Marine Parade/South Beach Parade (east side): detached seafront attractions set within landscaped grounds and with adequate spacing to ensure generous beach views between buildings.</p>
Building line (see also BF2)	<p>North Drive: buildings set back behind planted front gardens/curtilage parking.</p> <p>Marine Parade/South Beach Parade (west side): buildings predominantly tight to the back of pavement. Detached buildings occupying a full building block may be set back behind gardens or forecourt seating areas.</p> <p>Marine Parade/South Beach Parade (east side): buildings to be set back from pavement edge with generous landscaped public realm forecourts.</p>
Height and massing (see also BF1)	<p>North Drive: 2-3 storey development predominantly. 4 storey development may be acceptable in certain locations. Single-storey new development is not appropriate. Roof forms should predominantly match neighbouring building types unless a clear design rationale is presented for an alternative approach.</p> <p>Marine Parade/South Beach Parade (west side): 3-6 storey development predominantly. Taller buildings may be appropriate with careful design and siting. Varied roof forms are acceptable, including pitched, hipped, and mansard roofs, parapets with flat or mansard roofs behind, and dormers.</p> <p>Marine Parade/South Beach Parade (east side): Due to the nature of seafront attractions, height parameters are not appropriate but building heights and massing should be carefully determined through site specific analysis to limit impact on views and setting of heritage assets.</p>

Cycle and car parking (see also SM4 and SM5)	<p>North Drive: Cycle storage and parking should either be integrated into the design of front curtilage areas or within the building envelope. Parking can be provided within front curtilage areas but must be well screened by landscaped boundary treatments.</p> <p>Marine Parade/South Beach Parade (west side): For residential development, provide a high ratio of cycle storage and parking provision, and a low ratio of car parking, due to excellent public transport, walking and cycling connections. Commercial development, including hotels, to provide parking within the block interior.</p> <p>Marine Parade/South Beach Parade (east side): For tourist attraction and facilities, visitor car parking ratios to be clearly justified by transport analysis and a high level of secure and sheltered cycle parking should be provided. Cycle and car parking and storage for residents and employees to be provided within building envelope or within the block interior.</p>
Servicing (see also SM6 and BD7)	<p>North Drive: Refuse storage should be integrated into the design of front garden/yard space; or provided within the building envelope.</p> <p>Marine Parade/South Beach Parade: Residential refuse storage to be provided within building envelope or within the block interior. Commercial refuse storage to be carefully designed and sited to avoid visual impact, control odour, and discourage vermin.</p>
Street elevation design (see also CI4 , BD1)	<p>Careful design of street elevations is required to maintain the quality of the seafront vista. Where non-habitable space is required due to flood risk, blank elevations must be avoided – refer to BD1 for further guidance.</p> <p>North Drive: Elevations should have a regular rhythm which supports the overall visual unity of the street frontage, unless clearly justified by the architectural concept.</p> <p>Marine Parade/South Beach Parade (west side): Careful consideration of elevational design and proportion should be demonstrated through drawn street-scene elevations and perspective views of the proposal in context.</p> <p>Elevation design should include ornamental and decorative detailing including bay windows, decorative metalwork to balconies, eaves and verge detailing and shaped timber fascias, while ensuring maintenance is fully considered.</p> <p>Marine Parade/South Beach Parade (east side): Elevation design must be carefully considered and detailed to provide outstanding landmark buildings which enhance the quality of the seafront.</p>

<p>Boundary treatments (see also BD9)</p>	<p>North Drive: Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging or planting – all below 1m high. Side and rear garden boundaries to the public realm should be bounded by native hedging, post and rail fences or solid masonry walls.</p> <p>Marine Parade/South Beach Parade (west side): Active building frontages should form the street edge. Where buildings are set back from the pavement edge, boundary treatments must be kept below 1m in height to maintain an active frontage relationship and permeability to the street. Boundary treatments could include brick/flint walls, good quality metal railings, or planted boundaries.</p> <p>Marine Parade/South Beach Parade (east side): Boundary treatments to the street and to the beach must be carefully designed to be attractive and high quality while maintaining necessary security. Utility fencing is not generally acceptable.</p>
<p>Building design and materials (see also CI4)</p>	<p>North Drive: External façades should typically be appropriately detailed brick, flint, or hung tile. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept. Retain the coherence of the street frontage, and other frontages visible from the public realm, through careful design of any alterations and extensions visible from the street, and the redevelopment of plots, particularly for the 1930s housing north of Tennyson Road where the unified frontage is an asset.</p> <p>Marine Parade/South Beach Parade (west side): A wide range of external materials may be used but must be clearly justified by the architectural concept. Materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance. For this reason brick, flint, good quality hung plain tile and other self-finished materials may be preferable for the majority of the external envelope. Achieving the urban greening factor is likely to require the use of green roofs and climbing plants as well as landscape design.</p> <p>Marine Parade/South Beach Parade (east side): Design of new seafront attractions and public realm should continue to provide bold, vibrant and characterful landmarks which have a distinctive resort character, and which present a positive and active frontage to the public realm. A wide range of external materials may be used but must be clearly justified by the architectural concept. Materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance.</p>

<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Improving the quality, accessibility and climate resilience of the public realm is a priority for this character area, within both publicly and privately owned and maintained areas. Additional large scale street trees should be incorporated where possible to increase canopy cover and provide shade. All landscaping must include soft landscaped SuDS features and parking areas should use permeable paving materials.</p> <p>Public realm and landscape design should reduce the dominance of vehicle traffic and parking on the streetscape while maintaining necessary access and parking. Public open spaces should become more multi-functional, with seating, shade and shelter to allow for year-round use.</p> <p>Private gardens and open spaces make a significant contribution to the green infrastructure network for wildlife and biodiversity. Planning conditions should ensure soft landscaping is retained within privately owned and maintained areas, and not replaced with hard landscaping or artificial grass over time.</p> <p>Planting should use species that are salt- and drought-resistant, suitable for the exposed marine environment.</p>
<p>Other</p>	<p>Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals. Enhancing the appearance and setting of the many listed buildings along the seafront must be a priority.</p> <p>Existing and new public spaces should support a wide range of activities as well as forming part of the SuDS network and enhancing biodiversity.</p>

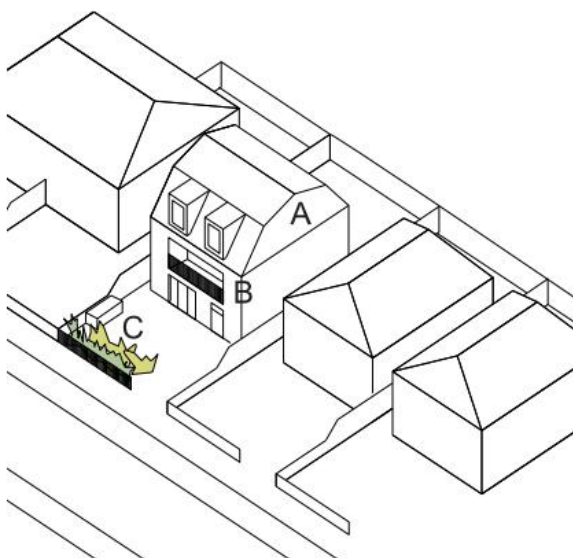


Fig. 52. Diagram showing North Drive infill development parameters

A Pitched roof forms can reduce the visual impact of 3 storey new buildings adjacent to 2-storey existing buildings.

B Inset balconies provide greater shelter from the wind and maintain a coherent building line

C Well planted front garden with low boundary treatment and on-plot car parking, cycle storage and refuse storage.

5.3 Gorleston town centre and historic core

To be read in conjunction with relevant Local Plan policies including those shown on figure 57.

This character area comprises the historic core of Gorleston, including the Conservation Area between the southern length of its High Street and eastern industrial estate. The remaining region of the town centre to the north is within the Gorleston Conservation Area Extensions.

Area characteristics:

- Low-rise, tight-knit development pattern interrupted by some larger commercial and industrial premises, with a wide variety of building styles and period but rarely above 3 storeys in height in the core of the town centre
- The level change from the High Street to the waterfront is significant, and new development on the waterfront ranges up to five storeys in height.
- In the core of the High Street buildings have little or no setback from the pavement, but on other streets a variety of setbacks and front gardens/yards is present.
- Several unlisted buildings contribute significantly to the overall character and street scene in this character area, specifically those with red brick and natural slate construction and timber sash windows around the High Street.
- Commercial/light industrial sites in some back land plots have potential for redevelopment



Fig. 53. Gorleston town centre seen from Quay Road, showing the low-rise tight-knit pattern of development.

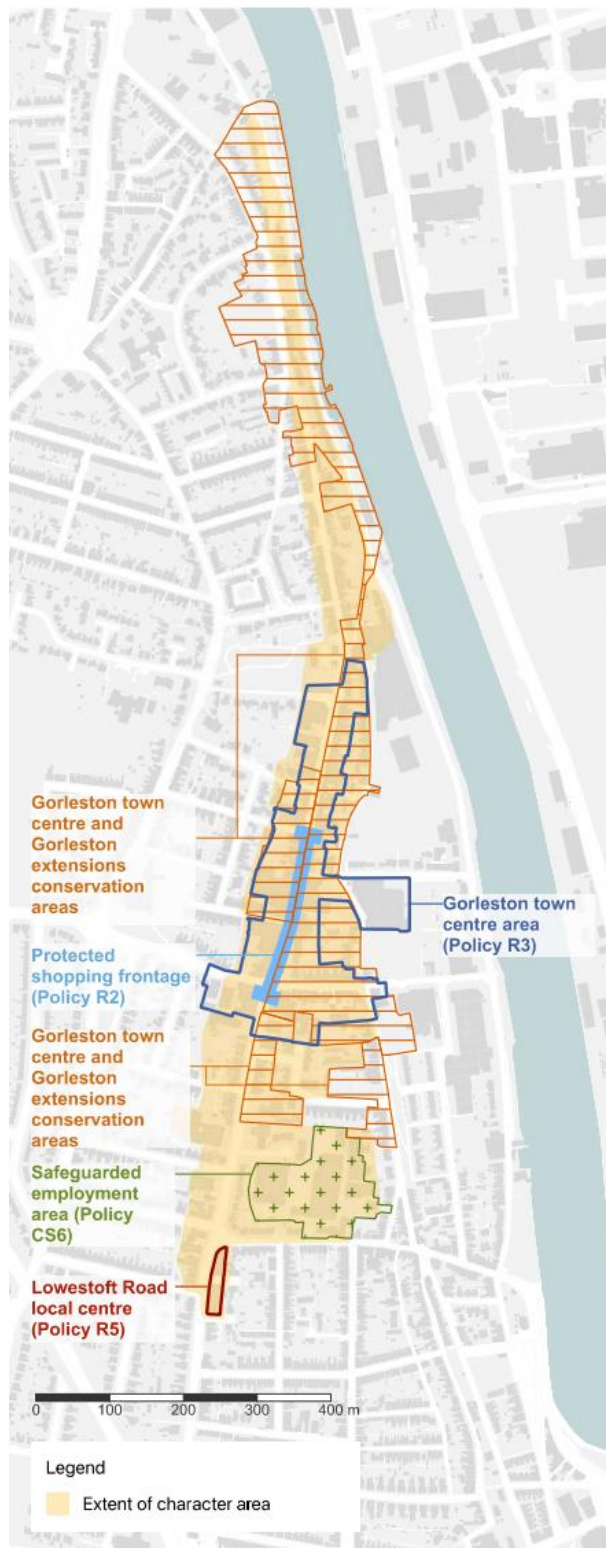


Fig. 54. Map of character area



Fig. 55. Photographs of Gorleston town centre showing the range of building styles and ages, and the occasionally gappy streetscene which could be 'mended' through appropriate infill development.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Minimum 50 dwellings per hectare for residential-led development, with the expectation of higher densities of up to 100dph Plot ratios for mixed-use development of 2 or over.
Development pattern (see also BF1 , BF2 and BF4)	Low-rise high-density blocks with unbroken street frontages.
Building line (see also BF2)	Continuous built edge to the back of pavement/public realm. Variation from the building line of adjoining buildings should be under 1m. On street-facing elevations, balconies should be inset not projecting.
Height and massing (see also BF1)	Predominantly 2-3 storeys. 4 storey development may be appropriate in locations where this does not dominate the streetscape and away from corners. Varied roof forms are acceptable, including pitched, hipped, gambrel and mansard roofs, parapets with flat or mansard roofs behind, and dormers.
Cycle and car parking (see also SM4 and SM5)	Provide a high ratio of cycle storage and parking provision, and a low ratio of car parking, due to good public transport, walking and cycling connections. Car free development may be appropriate on certain sites. Cycle and car parking and storage for residents and employees to be provided within building envelope or within the block interior. Garage doors should open onto internal courtyards and not onto the street.
Servicing (see also SM6 and BD7)	Refuse storage to be provided within building envelope or within the block interior.
Street elevation design (see also CI4 , BD1)	Elevations should be relatively simple and regular compositions. New shopfront designs should be in accordance with the Shopfronts Design Guide
Boundary treatments (see also BD9)	Buildings should form the boundary to the street and public realm. Where service yards or courtyards abut the street, they should be bounded by solid walls to 2m minimum, in high quality materials e.g. brick or flint. Good quality metal railings with planting behind may be acceptable on side streets.

<p>Building design and materials (see also CI4)</p>	<p>External façades should typically be well-detailed and high quality brick, flint, traditional lime render or painted brick in colours drawn from the local palette. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Alterations and energy efficiency improvements should not obscure high quality existing external materials such as brick and flint work. Replacement windows, balcony metalwork and similar should be of similar quality as the existing.</p> <p>Achieving the urban greening factor is likely to require the use of green roofs and climbing plants as well as green cover as part of landscape design.</p>
<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Landscape design should incorporate SuDS features including rain gardens and permeable paving. Additional street planting, of trees that will mature to provide good canopy spread and height, should be included where possible.</p>

5.4 Gorleston seafront

To be read in conjunction with relevant Local Plan policies including those shown on figure 59.

This character area comprises the seafront of Gorleston stretching south from the pier and the harbour arm along Marine Parade, including the public open green space. The majority of the Gorleston seafront is within the Gorleston Conservation Area Extensions.

Area characteristics:

- Gorleston's sea facing buildings on the Marine Parade are mostly early 20th century detached and semi-detached variations on villa typology. Those at the northern end are more generously scaled, up to 2.5 storeys in height, while towards the southern end the scale of buildings decreases to more modest proportions.
- Villas typically have prominent pitched roofs with dormers and rooms in the roof rather than a full upper storey.
- Villas are set back from the pavement edge behind well-planted and generous front gardens, usually including on-plot parking.
- The villas are often with stylistic flair, features and individual detailing – whether Gothic Revival, Arts and Crafts, neo-Georgian, neo-Elizabethan, modernist or mid-century styling. Bay windows can be characterful and sometimes topped with decoratively detailed leaded canopies. While the villas are not uniform in design, they typically are found in small groupings built at a similar time, and sharing stylistic features.
- The villas form the backdrop to well-used public open green space which includes community sports facilities, and an important vista in the townscape.



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Fig. 59. Map of character area

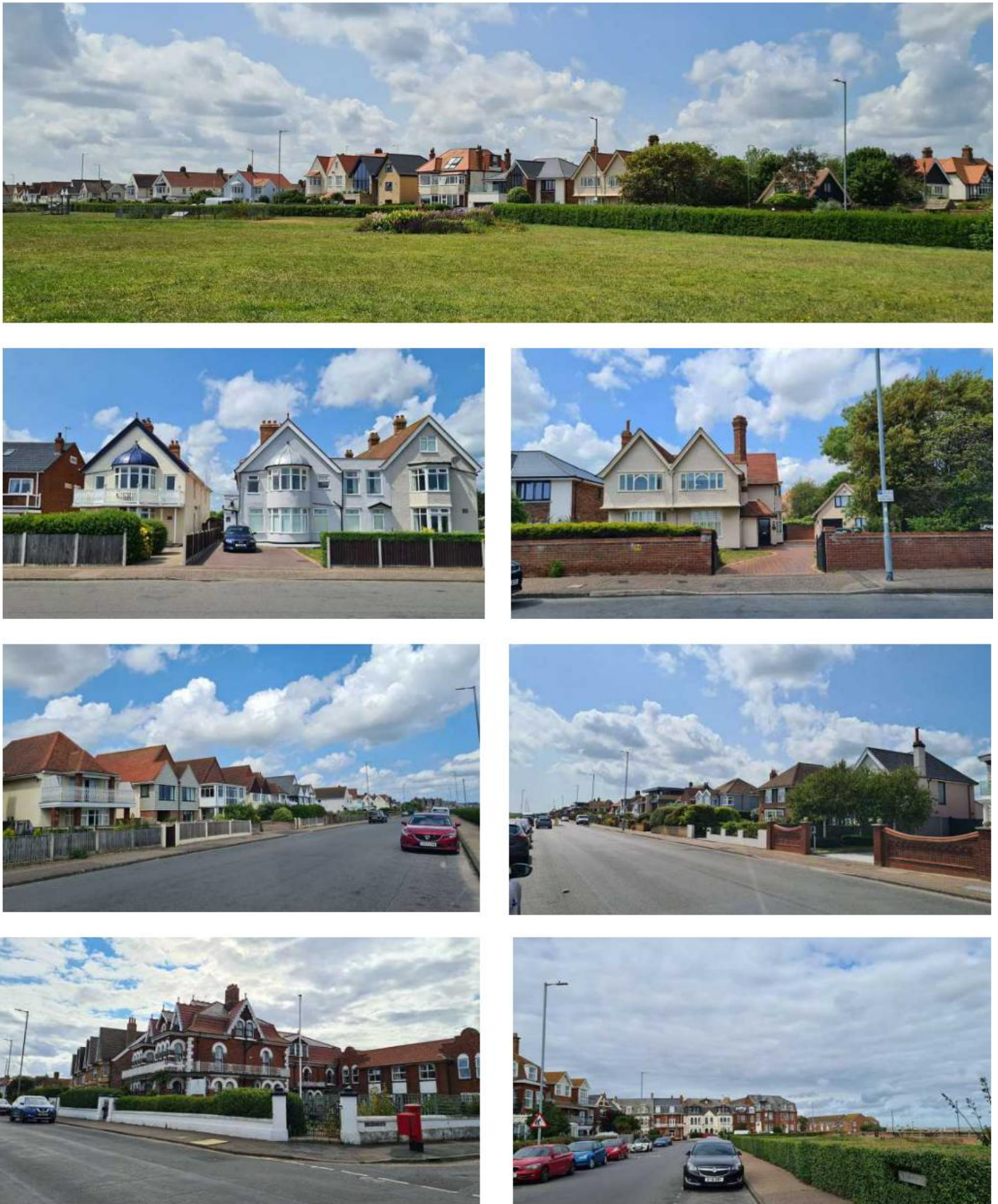


Fig. 57. Photographs of Gorleston seafront showing the generally uniform scale and development pattern with individual variety of dwelling design bringing character and liveliness to the streetscene. It can be seen how flat-roofed dwellings need careful design if they are not to appear boxy and out of place among the typical pitched-roof forms.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	35-50 dwellings per hectare for residential-led development. Development of apartments may reach slightly higher densities, depending on unit type and mix.
Development pattern (see also BF1 , BF2 and BF4)	Detached and semi-detached building types within a villa pattern. Short terraces (e.g. 4-6 townhouses) may be appropriate in certain locations.
Building line (see also BF2)	Set back from the pavement edge with planted front gardens and on-plot parking. Building line should not be set more than 2m forward or behind the line of adjacent buildings.
Height and massing (see also BF1)	<p>Predominantly 2-2.5 storeys. 3 storey massing may be appropriate in certain circumstances but must be carefully justified with reference to the impact on context, and is unlikely to be acceptable as the predominant height for new buildings.</p> <p>Roof forms should be typically pitched, hipped, gambrel or mansard roofs, with steep pitches and dormers/gables. 'Catslide' roofs and chalet-style roof forms can be used. Flat roofed forms can be appropriate if carefully designed in relation to adjacent buildings, with high quality parapet detailing and well-proportioned windows.</p> <p>Inset balconies are preferable on street-facing elevations as these provide better shelter from wind, and can be more coherently integrated with the overall form and massing of buildings.</p>
Cycle and car parking (see also SM4 and SM5)	<p>Both cycle and car parking and storage should be generously provided on-plot, due to the lower residential densities and larger size of homes expected in this character area. Car parking should include on-plot visitor parking. Good levels of secure, enclosed cycle storage should be provided close to front doors of homes and could be integrated with the provision of refuse storage.</p> <p>Where garages are provided (integrated or detached), these must not be set forward of the general building line.</p>
Servicing (see also SM6 and BD7)	Refuse storage areas should be integrated into the design of front garden/parking areas.
Street elevation design (see also CI4 , BD1)	<p>Careful consideration of elevational design and proportion should be demonstrated through drawn street-scene elevations and perspective views of the proposal in context.</p> <p>Elevation design could include ornamental and decorative detailing including bay windows, decorative metalwork to balconies, eaves and verge detailing and shaped timber fascias.</p> <p>Avoid overheating resulting from overly large expanses of unshaded glazing. External shading to glazing can provide an opportunity for additional articulation to elevations.</p>

Boundary treatments (see also BD9)	Boundary treatments to the street should be either low brick/flint walls, open timber fencing or good quality metal railings up to 1m tall, with planting in front and/or behind; or native hedging up to 1.3m tall. A visual connection between building and street must be maintained at eye level to maintain natural surveillance and safety.
Building design and materials (see also CI4)	A wide range of external materials may be used but must be clearly justified by the architectural concept. Materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance. For this reason brick, flint, good quality hung plain tile and other self-finished materials may be preferable for the majority of the external envelope.
Landscape design and materials (see also CC7 , CC8 , PS1-5)	On-plot parking should be surfaced in permeable materials. Tree planting within front and rear gardens is encouraged. Additional street planting, of trees that will mature to provide good canopy spread and height, should be included where possible. Materials and choice of plants in landscaping must be suitable for the exposed marine location.

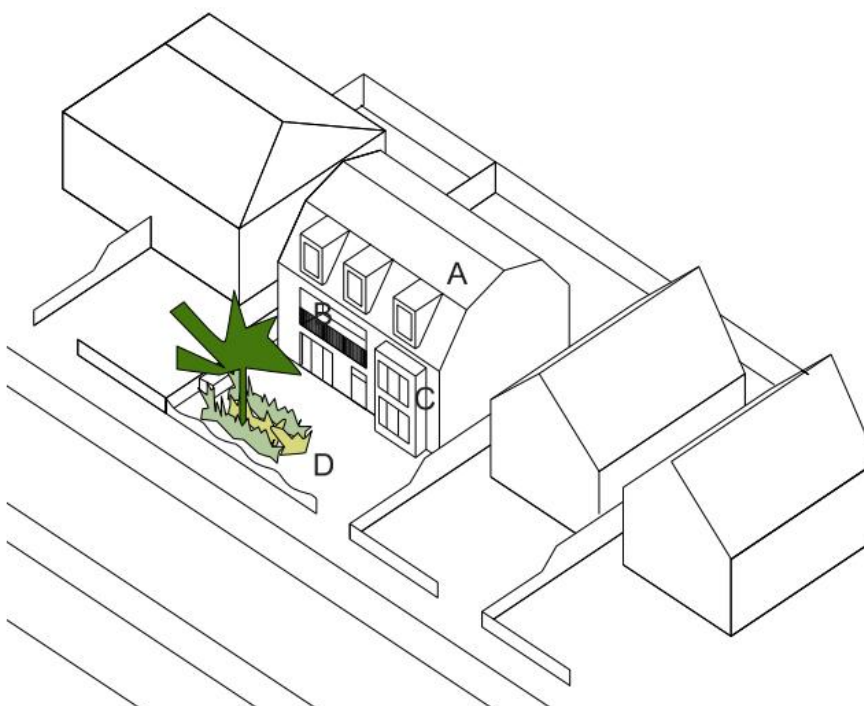


Fig. 58. Diagram showing development parameters for new detached seafront homes

A Pitched roof forms can reduce the visual impact of 3 storey new buildings adjacent to 2-storey existing buildings.

B Inset balconies provide greater shelter from the wind and maintain a coherent building line

C Bay windows and other features create an attractive frontage with detail that enhances the streetscape.

D Well planted front garden with low boundary treatment and on-plot car parking, cycle storage and refuse storage.

5.5 Great Yarmouth and Gorleston port and industrial areas

To be read in conjunction with relevant Local Plan policies including those shown on figure 62.

The port and industrial areas have more recent development in the borough and are an important visual reminder of the economic vitality/regeneration of the borough. In Great Yarmouth Town, South Denes port covers a significant portion of this character area and has a Design Code and Enterprise Zone in place. However, other industrial areas have potential for redevelopment over time.

The design code requirements in this section relate to residential and mixed use redevelopment and not to industrial/warehousing single use development, which should follow the code within the Local Development Order.

Area characteristics:

- A strongly gridded plot pattern of relatively large plots with a wide range of building ages and styles, from good quality survivals of late 19th and early 20th century industrial buildings, to very recent large warehouses and including uncovered storage yards.
- Buildings are substantially in size and have very simple, functional massing
- There is a notable contrast between South Quay (historic waterfront) and the industrial development pattern on the other side of the river although they are seen together in the prominent riverfront vistas. The Victorian gasholder is prominent in long views.
- Earlier industrial buildings are predominantly brick with some concrete frame buildings with expressed structure giving them a strongly horizontal rhythm to their elevations. Some have attractive decorative features, large windows and address the street with articulated porches and elevational design.
- Later buildings are predominantly steel framed with lightweight sheet cladding emphasizing their simple massing of predominantly extruded pitched-roof forms.
- Some residential and other building types remain within the port and industrial areas, such as former pubs, churches as well as operational shops, cafés and smaller workshop buildings sometimes now used for studios. In many instances these add positively to the character of the streetscape.



Fig. 59. The riverfront industrial area seen from the bridge (left) and from the Gorleston riverfront (right)



Fig. 60. Map of character area



Fig. 61. Photographs showing the mixed nature of the character area. Due to the topography, views from Gorleston overlooking the riverside areas need to be considered. New apartment buildings present a blank and inactive ground floor frontage and do not take design cues from the attractive older industrial buildings which could form a strong reference point for the scale and articulation of substantial new building



Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	<p>Minimum 50 dwellings per hectare for residential-led development with the expectation of substantially higher densities. Over 150 dwellings per hectare may be achievable.</p> <p>Plot ratios for mixed-use development of 2 or over.</p>
Development pattern (see also BF1 , BF2 and BF4)	Perimeter block development within gridded street pattern. Block pattern must be of sufficient scale to support higher density urban scale development. Where new streets and public routes are created, these must follow natural desire lines to local destinations including high streets and local centres.
Building line (see also BF2)	<p>Consistent building lines should be maintained along the length of a block, but can be set back from the pavement edge to provide external spill-out space, which could include limited visitor parking, for ground floor commercial uses. Alternatively, buildings can be built up to the back of the pavement.</p> <p>Generous pavement widths should be provided including space for street trees and seating.</p>
Height and massing (see also BF1)	<p>Predominantly 4-6 storeys (12-20m) but taller buildings may well be appropriate for waterfront sites.</p> <p>Urban block forms should be used with parapet roofs. Shallow pitched/hipped roofs are not appropriate for the pattern of development in these areas. Mansard roof forms, and set back attic storeys, may be appropriate if carefully designed.</p>
Cycle and car parking (see also SM4 and SM5)	<p>Provide a high ratio of cycle storage and parking provision, and a low to medium ratio of car parking, due to good public transport, walking and cycling connections and the desired urban development pattern.</p> <p>Cycle parking and storage for residents and employees to be provided within building envelope or within the block interior.</p> <p>Car parking to be provided within the block interior, or in basement parking. Parking should be unallocated and include provision of car club spaces.</p>
Servicing (see also SM6 and BD7)	Refuse storage to be provided within building envelope or within the block interior.
Street elevation design (see also CI4 , BD1)	<p>Elevations should have a regular rhythm, unless clearly justified by the architectural concept.</p> <p>Where non-habitable space is required due to flood risk, blank ground floor elevations must be avoided – refer to BD1 for further guidance.</p> <p>Design of waterside elevations must create a coherent and very high quality composition with a civic character which complements the historic quayside area on each side of the River Yare, creating a truly distinctive character.</p>
Boundary treatments (see also BD9)	Where buildings are set back from the pavement edge, boundary treatments must be kept below 1m in height to maintain an active frontage relationship and permeability to the street. Boundary treatments could include brick/flint walls, good quality metal railings, or planted boundaries.

<p>Building design and materials (see also CI4)</p>	<p>External façades should typically be well-detailed and high quality brick, flint, or traditional lime render. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Achieving the urban greening factor is likely to require the use of green roofs and climbing plants as well as landscape design.</p>
<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Landscape design should incorporate SuDS features including rain gardens and permeable paving. New street trees that will mature to provide good canopy spread and height, should be included throughout.</p>
<p>Other</p>	<p>Waterfront sites must ensure public access to the full length of the waterfront creating a high quality public realm for walking and cycling, including street trees, lighting, public art. At least 10m depth of public realm is recommended along the length of the waterfront, and more generous provision is encouraged.</p> <p>Historically significant structures and buildings of quality, regardless of status as designated heritage assets, should be retained and reused if possible.</p> <p>Development near Nelson's monument must enhance the setting of the heritage asset.</p> <p>Views of the Victorian gasholder should be considered and enhanced by the placement and massing of new development.</p>

5.6 Caister-on-Sea village centre

To be read in conjunction with relevant Local Plan policies including those shown on figure 64.

This character area comprises the historic core of Caister-on-Sea, including the fishing village, 19th century and early 20th century cottages and terraces and the commercial high street. This is included as a character area due to its mixed character and historic importance. Although it lacks a formal designation of a Conservation Area or a high density of listed buildings, the area does have a distinctive character which could be eroded by unsympathetic infill development or redevelopment of sites.

Area characteristics:

- A close-knit pattern of development of narrow streets and alleys leading off the main streets (High Street/Yarmouth Road, Beach Road, Tan Lane).
- A wide variety of building styles, ages and types within an overall low-rise relatively high-density pattern, giving the streetscape variety and interest.
- Buildings are mainly cottages and short terraces with some unusual typologies, for example along Clay Road and Victoria Street, where outbuildings and private yards abut the street with the homes set back.
- Some 1920s / 1930s buildings with Art Deco features remain of good quality and in good condition.
- Several buildings by the seafront hold significant heritage value, such as the Coastguard and fishing cottages, both in terms of cultural and architectural value.
- Lanes and alleys are frequently unsurfaced, maintaining the informal fishing village character, but in some places boundary treatments are unattractive and of poor quality.
- Some 20th century and later development has not maintained the close-knit character with large setbacks and areas of front curtilage parking, and gaps between buildings resulting in less coherence to the built form and character.



Fig. 62. Map of character area



Fig. 63. Photographs of the Caister-on-sea village character area

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Minimum 30 dwellings per hectare, with higher densities up to 50 dwellings per hectare possible depending on unit type and mix. Plot ratios for mixed-use development of 1 or over.
Development pattern (see also BF1 , BF2 and BF4)	Low-rise building forms which can include short terraces, detached and semi-detached buildings, courtyard housing and mews lanes. Avoid lengthy stretches of uniform building types. Private gardens/courtyards should be kept small to maintain the close-knit low-rise character.
Building line (see also BF2)	A varied building line is acceptable with buildings set tight to the street edge or set back up to 3m. Infill development on the main streets should conform to the building line set by neighbouring development, varying by up to 1m.
Height and massing (see also BF1)	Predominantly 1-2 storeys. 3 storey development may be appropriate in locations where this does not dominate the streetscape and away from corners. Varied roof forms are acceptable, including pitched, hipped, gambrel and mansard roofs, parapets with flat or mansard roofs behind, and dormers.
Cycle and car parking (see also SM4 and SM5)	Cycle and car parking and storage must be provided on-plot. Avoid extensive front curtilage parking.
Servicing (see also SM6 and BD7)	Refuse storage to be provided within building envelope or well-integrated into the design of front gardens/yards.
Street elevation design (see also CI4 , BD1)	Elevations should be relatively simple and modest. New shopfront designs should be in accordance with the Shopfronts Design Guide
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging – all below 1m high. Where side or rear gardens or yards abut the street, they should be bounded by solid walls to 2m, in high quality materials e.g. brick or flint, or by hedging. Close boarded fencing to side or rear boundaries is not acceptable.
Building design and materials (see also CI4)	External façades should typically be well-detailed and high quality brick, flint, traditional lime render or painted brick in colours drawn from the local palette. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.
Landscape design and materials (see also CC7 , CC8 , PS1-5)	Front gardens/yards including parking, and private lanes and paths should be surfaced in permeable materials. Bound or unbound gravel surfacing to parking areas and private lanes/alleys is preferable to block paving. Planting should use species that are salt- and drought-resistant, suitable for the soil and climate of the village.

Other	Opportunities for sensitive infill and redevelopment of under-utilised sites should be supported where they mend the street line, reinforce the close-knit pattern of development, and reduce the impact of front curtilage parking on the streetscape.
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Fig. 64. Opportunities for improvement of the character area

Left: close boarded fencing to the public realm does not enhance the character of the area.

Right: parking areas onto the street detract from the overall close-knit character of the area and provide opportunities for redevelopment.

Area types

5.7 Terraced streets and squares

This area type, resulting from the 19th century expansion of Great Yarmouth and Gorleston, consists predominantly of terraced streets of various kinds, ranging from tight back-to-back terraces to more elaborate developments of the period including squares and public gardens. Some of this character area is covered by Conservation Areas (St Nicholas/Northgate Street, St George's, Prince's Road, Camperdown) which protect set-piece environments and buildings.

Area type characteristics:

- Mainly terraced housing in a gridded, back-to-back, street pattern intersected in places by historic rope walks running at diagonal angles
- Homes typically have small, or no, front yards or gardens. Where front gardens or yards exist, they are typically bounded by low brick walls or railings where they have not been converted for use as parking spaces.
- Rear gardens and yards vary, with some streets having little or no rear gardens or yards, while others have more generous rear gardens that now contribute to the overall green infrastructure of the area.
- Typically, rear alleys give access to the block interior, and in some places small greens can be found in the block interior, accessed from the street and frequently used for car parking. Due to the predominance of rear alleys, front yards/gardens are rarely used for refuse bins or cycle storage.
- Churches (contemporary to the terraced streets) and their churchyards, as well as formal parks and gardens, form strong landmarks within the street pattern. A few semi-detached homes, or larger community use buildings sit at street junctions.
- The design of street frontages ranges from plain workers housing to more ornate middle-class housing with a greater level of façade detail. Many streets are characterized by projecting bays, decoratively embellished, and many homes retain original sash windows and other features. Towards the seafront, terraces often have elegant original balconies. Plainer, flat-fronted terraces have simple well-proportioned elevations but have typically been more heavily altered.
- Areas of later development do not consistently reinforce a continuous and active street frontage and have resulted in 'left-over' areas of public space with no clear purpose, forecourt parking, and blank frontages to the street.
- Most streets have narrow pavements and lack street trees. A lack of off-street parking means that streets can be dominated by parked cars.



Fig. 65. Map indicating main areas of terraced streets and squares in Great Yarmouth and Gorleston-on-Sea. Other small areas of this character type can be found across the borough.



Fig. 66. Photographs showing the wide variety of terraces found across the borough



Fig. 67. Photographs showing some of the challenges of the terraced streets.

Top: streetscenes can become dominated by cars, and pavement parking means pavements are not accessible for all users.

Middle left: historic terraces, particularly of smaller workers housing, can be difficult to find appropriate new uses for.

Middle right: new infill development on this terraced street maintains the overall scale and roof form, but lacks the rhythm of the terraced house pattern, with shared porches and front yards meaning the houses appear to be larger linear buildings rather than terraces. The front boundary treatments and accommodation of the level change is also awkward and does not enhance the streetscape, and the windows do not have the attractive proportions of the other houses on the street

Bottom: rear alleys and yards behind terraced houses often present an uncared for appearance and garage sites provide the opportunity for sensitive infill which could provide upper floor living space while retaining parking where needed.

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Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Dependent on the location, typically 50 dwellings per hectare for residential-led development, with the expectation of higher densities of up to 100dph. In some areas, lower densities of 35-50 dwellings per hectare may be appropriate. Plot ratios for mixed-use development of 2 or over.
Development pattern (see also BF1 , BF2 and BF4)	Low-rise high-density terraces with unbroken street frontages. Development should reinforce the strong character of this area type and avoid infill development that dilutes the terraced pattern.
Building line (see also BF2)	Maintain the building line set by existing adjacent buildings to ensure streets continue to have a consistent appearance. Commercial development must also maintain the prevailing building line and should not be set back behind parking. Variation from the building line of adjoining buildings should be under 1m. On street-facing elevations, balconies should be inset not projecting.
Height and massing (see also BF1)	Terraces vary from 2-5 storeys. Height of new development should match that of surrounding buildings, or add one additional storey. On larger sites, greater variance in height may be acceptable but must be shown to sit comfortably within the townscape without extensive visible flank walls. Varied roof forms are acceptable, including pitched, hipped, and mansard roofs, parapets with flat or mansard roofs behind, and dormers. Roof forms should predominantly match neighbouring building types unless a clear design rationale is presented for an alternative approach.
Cycle and car parking (see also SM4 and SM5)	Cycle storage and parking should either be integrated into the design of front garden/yard space; within the building envelope; or within storage accessible directly from rear alleys (where present). Car parking must not be provided within front curtilage areas.
Servicing (see also SM6 and BD7)	Refuse storage should either be integrated into the design of front garden/yard space; within the building envelope; or within storage accessible directly from rear alleys (where present). Avoid creating new rear alleyways. Refuse containers must have dedicated enclosed storage so they are concealed from view.
Street elevation design (see also CI4 , BD1)	Elevations should follow a rhythmic pattern and broadly vertical proportions. Bay windows and ornamental detailing can assist in creating attractive and contextually sympathetic elevations.
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket fencing, metal railings or native hedging – all below 1m high. Side and rear garden boundaries to streets or rear alleyways should be bounded by solid walls to 2m, in high quality materials e.g. brick or flint, or by hedging. Close boarded fencing to side or rear boundaries to the public realm, including alleyways, is not acceptable.

Building design and materials (see also CI4)	External façades should typically be well-detailed and high quality brick, flint, traditional lime render or painted brick in colours drawn from the local palette. Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.
Landscape design and materials (see also CC7 , CC8 , PS1-5)	Landscape design should incorporate SuDS features and all parking areas should use permeable paving. Additional street planting, of trees that will mature to provide good canopy spread and height, should be included where possible.
Other	<p>Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals.</p> <p>Improvements to the quality of rear alleys and publicly accessible greens/courtyards in the block interior should be sought, to regularize the layout of parking, improve safety, add tree planting and create opportunities for functional use of the public realm.</p>

5.8 Interwar housing estates

This area type comprises housing developed by both private developers and local councils, in rural and suburban settings. It includes the so-called 'homes fit for heroes' built to address housing shortages after World War 1, as well as speculative development along 'garden city' design principles. Development within these estates is generally limited to small infill sites, on-plot replacement dwellings and upgrading of properties for energy efficiency.

Area type characteristics:

- Spacious cottage estate layouts of semi-detached and short terrace forms.
- Generous gardens to front and rear, typically larger in villages than the towns.
- Simple house plans with good room sizes, adaptable and extendable.
- Typically generous setbacks from the street which now often accommodate front curtilage parking. Low rise walls to front garden and many street facing windows gives these streets a safe presence, 'active surveillance'
- Attractive mature planting in some areas including street trees, although others suffer from a poor quality streetscape.
- Many estates have attractive period detailing drawing on Arts and Crafts and Art Deco/ Moderne influences, including decorative brickwork, arched openings to porches and front doors, catslide roofs, bay windows and dormers. Simpler estates still have good proportions, generous window sizes and plain but well-built character.
- External elevations are typically red or brown brick or render, with hung tile or timber weatherboarding to features. Roofs are typically plain tile or slate.
- Higher density estates, such as in Great Yarmouth town, sometimes have narrower roads and pavements resulting in issues of on-street parking (sometimes on pavement parking) and bins.
- Parking and bin issues are less pronounced where pavements and roads are wider.



Fig. 68. Photographs of interwar housing estates. Left: example showing attractive mature hedges and planting and well-proportioned homes. Right: some estates have a poor quality public realm with few street trees and dominant highways.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Dependent on the location, densities of 30-50 dwellings per hectare are expected. Higher densities may be appropriate for larger sites and/or development that predominantly comprises apartments. Plot ratios for mixed-use development of 1 or over.
Development pattern (see also BF1 , BF2 and BF4)	Street-based pattern predominantly comprising terraced and semi-detached buildings. In some locations, backland development can be an appropriate way to create additional homes within existing neighbourhoods.
Building line (see also BF2)	Buildings should be set back behind well-landscaped front gardens (residential) or parking (commercial/mixed-use). Maintain the building line set by existing adjacent buildings to ensure streets continue to have a consistent appearance. Commercial development must also maintain the prevailing building line. Variation from the building line of adjoining buildings should be 1-2m.
Height and massing (see also BF1)	2-3 storey development predominantly. 4 storey massing may be acceptable in certain locations subject to very careful consideration of design. Single-storey new development is not appropriate. Varied roof forms are acceptable, including pitched, hipped, and mansard roofs, parapets with flat or mansard roofs behind, and dormers. Roof forms should predominantly match neighbouring building types unless a clear design rationale is presented for an alternative approach.
Cycle and car parking (see also SM4 and SM5)	Cycle storage and parking should either be integrated into the design of front curtilage areas or within the building envelope. Parking can be provided within front curtilage areas but must be well screened by landscaped boundary treatments.
Servicing (see also SM6 and BD7)	Refuse storage should be integrated into the design of front garden/yard space; or provided within the building envelope.
Street elevation design (see also CI4 , BD1)	Elevations should have a regular rhythm unless clearly justified by the architectural concept. Bay windows and carefully designed ornamental detailing can assist in creating attractive and distinctive character.
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket fencing, metal railings or native hedging – all below 1m high. Side and rear garden boundaries to streets or rear alleyways should be bounded by solid walls to 2m, in high quality materials e.g. brick or flint, or by hedging. Close boarded fencing to side or rear boundaries visible from the public realm is not acceptable.
Building design and materials (see also CI4)	External façades should typically be well-detailed and high quality brick, flint, or hung tile. Timber weatherboarding may also be appropriate. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.

Landscape design and materials (see also CC7 , CC8 , PS1-5)	<p>Landscape design should incorporate SuDS features and all parking areas should use permeable paving. Additional street trees that will mature to provide good canopy spread and height, should be included where possible. New gardens should include trees.</p> <p>Front gardens should be mostly soft landscaped, with limited paved surfaces. Where existing front gardens are proposed for conversion to parking, this is only appropriate when the majority of the garden will remain soft landscaped and there will be no loss of trees.</p>
Other	<p>Development should enable improvement of the public realm through inclusion of SuDS, seating, informal natural play and biodiverse planting.</p> <p>Upgrades to the energy performance of existing buildings should be consistent along a street or group of homes</p>



Fig. 69. Examples of interwar estates around the borough. Some have attractive leafy landscaping but others lack street trees and corners have under-used public realm which could be improved by tree planting, public realm improvements such as seating and 'play on the way', and sensitive infill development that could enclose the corner with a continuous built frontage.

5.9 Postwar housing estates

This area type comprises estate housing developed by both private developers and local councils, from World War 2 up to the present day. Estates range widely in style but each has a distinctive character and pattern of development. Development within these estates is generally limited to small infill sites, redevelopment of garage sites and under-utilised 'left over' spaces, on-plot replacement dwellings and upgrading of properties for energy efficiency.

Area type characteristics:

- Most post-war estates take low-density patterns of development made up of semi-detached and detached houses, with spacious front and back gardens.
- Layouts are frequently arranged around curving streets and include a high proportion of cul-de-sacs. In some cases this results in a lack of legibility to the street layout, a lack of connectivity along natural desire line routes to local destinations, and awkward relationships between buildings and the public realm.
- Estates include both two-storey and bungalow (1-storey or 1.5 storey) development. 3 storey development is rarely found.
- The quality and function of public open spaces is mixed with many estates including indeterminate green spaces which are not well used either functionally nor for biodiversity. Some estates have good mature street trees/planting while others lack any canopy cover and have sterile grass verges.
- The layout and type of parking on some estates, including garage blocks and parking courts, frequently create blank flank walls and lack of active frontages / natural surveillance to the public realm.
- Materials, styles and details vary between estates. Some estates, particularly from the 1950s-1970s, have characterful and attractive original details and features which add to their coherence and distinctiveness. Others comprise a range of house types on a single street or estate, with little overall coherence, and extensions and alterations have further eroded the design identity of the estate as a whole. In the more attractive estates, their coherence and quality usually derives from the use of a more limited palette, typically brick with other materials used for details or features only.



Fig. 70. Postwar estates are hugely varied and include attractive, relatively compact 1950s social housing and very low-density estates drawing on American suburban models.



Fig. 71. Examples of the opportunities and challenges posed by postwar estates. Typically very low-density, they often lack good street trees and while they benefit from very wide streets and expansive verges, these are sterile, lacking trees or biodiverse planting, and do not offer residents spaces to play or socialise. Some estate layouts present flank walls to the street and lack natural overlooking. Boundary treatments to the side and rear of dwellings often face streets and can create lengthy blank frontages. There is the opportunity for 'gentle densification through infill and adaptation which does not need to compromise the character of these well-loved neighbourhoods.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Dependent on the location, densities of 30-40 dwellings per hectare are expected. Plot ratios for mixed-use development of 1 or over.
Development pattern (see also BF1 , BF2 and BF4)	Infill development should reinforce a legible street pattern fronted by detached and semi-detached buildings, and short terraces. In some locations, tandem (backland) development can be an appropriate way to create additional homes within existing neighbourhoods and this may take a range of forms.
Building line (see also BF2)	Buildings should be set back behind well-landscaped front gardens (residential) or parking (commercial/mixed-use). Maintain the building line set by existing adjacent buildings to ensure streets continue to have a consistent appearance. Commercial development must also maintain the prevailing building line. Variation from the building line of adjoining buildings should be 1-2m.
Height and massing (see also BF1)	2-3 storey development predominantly. 4 storey development may be acceptable in certain locations. Single-storey new development is not appropriate. Where replacement dwellings are proposed, the new dwelling may be up to 1 storey taller than the building it replaces, unless daylight, sunlight and privacy of neighbouring homes and gardens will be impacted to an unacceptable degree.
Cycle and car parking (see also SM4 and SM5)	Cycle storage and parking should either be integrated into the design of front curtilage areas or within the building envelope. Parking can be provided within front curtilage areas but must be well screened by landscaped boundary treatments. Where garages are provided (integrated or detached), these must not be set forward of the general building line.
Servicing (see also SM6 and BD7)	Refuse storage should be integrated into the design of front garden/ yard space; or provided within the building envelope.
Street elevation design (see also CI4 , BD1)	Development and redevelopment within existing estates should form active frontages to streets and open spaces and provide natural overlooking to the public realm.
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging or planting – all below 1m high. Side and rear garden boundaries to the public realm should be bounded by native hedging, post and rail fences or solid masonry walls. Close boarded fencing to exposed side or rear boundaries is not acceptable.
Building design and materials (see also CI4)	Materials should be sympathetic to the specific estate within which the site is located and design should be used to create an integrated and coherent appearance to the street.

<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Landscape design should incorporate SuDS features and all parking areas should use permeable paving.</p> <p>Additional street trees that will mature to provide good canopy spread and height, should be included where possible. New gardens should include trees.</p> <p>Front gardens should be mostly soft landscaped, with limited paved surfaces. Where existing front gardens are proposed for conversion to parking, this is only appropriate when the majority of the garden will remain soft landscaped and there will be no loss of trees.</p>
<p>Other</p>	<p>Development should enable improvement of the public realm through inclusion of SuDS, seating, informal natural play and biodiverse planting.</p> <p>Upgrades to the energy performance of existing buildings should be consistent along a street or group of homes</p>

5.10 Historic village centres

This area type comprises the historic cores of the rural villages, predominantly made up of organic development up to the early 20th century. Historic villages centres are mostly covered by conservation areas except for Scratby, Ormesby St Michael, Filby, Mautby, and Fritton, but the latter do still have attractive informal village centres and these fall into this area type.

Development proposals in this area type are limited to small infill development, on-plot replacement dwellings, extensions and upgrades to properties to improve energy efficiency.

Area type characteristics:

- Historic villages usually developed around generous green or cross-roads with gradual, but relatively limited, linear development of cottages and short terraces along lanes and narrow alleyways.
- The village centres often include a range of current and former places of worship reflecting the varied nature of denominations in this part of Norfolk and the history of non-conformism
- There is little industrial development or building types but some workshops and associated yards
- The development pattern is irregular and informal comprising cottages and buildings of a range of ages and styles, but typically unified by the use of locally prevalent building materials, including brick, flint and stone with some timber weatherboarding and lime render. Roofs are almost all pantiled with some use of plain tile and slate.
- Most buildings have attractive but small-scale proportions and plain detailing. Internal storey heights are usually considerably lower than can be accepted in new-build development which leads to some challenges where new proposals aim to replicate historic neighbouring precedents.
- Smaller lanes and alleyways can be unsurfaced which contributes to their informal rural character.
- Boundary treatments are typically low and informal, and front gardens are well-planted.



Fig. 72. Examples of typical historic village centres in the borough.



Fig. 73. Examples of the charm and challenges of the rural villages. The organic pattern of development has resulted in a wide range of building types and styles, many originally designed as places of work, study or religion but now adapted to residential use.

Bottom left: well-detailed and sensitively designed infill housing successfully follows a clustered traditional pattern of cottage development with low boundary walls and parking carefully concealed.

Bottom right: new development does not always successfully create village 'greens' and other rural development patterns, as can be seen here, where homes are set too far back and boundary treatments are poor.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	<p>Minimum 30dph within historic village centres which fall within Belton, Hemsby, Hopton-on-Sea, Martham, Ormesby St Margaret and Winterton.</p> <p>Within other historic village centres, residential densities should be a minimum of 20 dph.</p> <p>Plot ratios for mixed-use development of 1 or over.</p>
Development pattern (see also BF1 , BF2 and BF4)	<p>Informal pattern of streets, greens, alleys and yards/courts. Buildings can be detached, semi-detached or in short terraces. Scale of buildings should be carefully considered in relation to the scale of the site/plot. Larger new detached homes should be sited on larger plots with sufficient landscaping, while smaller dwellings can form a more compact pattern of development with small courtyard gardens making better use of land.</p>
Building line (see also BF2)	<p>A varied building line is acceptable with buildings set tight to the street edge or set back. The building line and development patterns should be site-specific and justified by close analysis of the surrounding context.</p>
Height and massing (see also BF1)	<p>Predominantly 1-2 storeys. 3 storey development may be appropriate in locations where this does not dominate the streetscape and away from corners.</p> <p>Roofs should be predominantly pitched, hipped, gambrel and mansard roofs. Flat roofed buildings may be appropriate for commercial or mixed-used development, or small apartment buildings, with careful design in relation to the site context.</p>
Cycle and car parking (see also SM4 and SM5)	<p>Cycle and car parking and storage must be provided on-plot. Avoid extensive front curtilage parking.</p>
Servicing (see also SM6 and BD7)	<p>Refuse storage to be provided within building envelope or well-integrated into the design of front gardens/yards.</p>
Street elevation design (see also CI4 , BD1)	<p>Elevations should have relatively simple detailing and use of materials, well-proportioned openings and provide natural overlooking of the public realm.</p>
Boundary treatments (see also BD9)	<p>Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging – all below 1m high. Where side or rear gardens or yards abut the street, they should be bounded by solid walls to 2m, in high quality materials e.g. brick or flint, or by hedging. Close boarded fencing to exposed side or rear boundaries is not acceptable.</p>
Building design and materials (see also CI4)	<p>External façades should typically be well-detailed and high quality brick, flint, traditional lime render or painted brick in colours drawn from the local palette. Timber weatherboarding may also be appropriate. More prominent pitched roofs should be slate, good quality plain tiles or pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>

<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Landscape design should incorporate SuDS features and all parking areas should use permeable paving.</p> <p>New gardens, and parking areas servicing commercial development, should include trees.</p> <p>Front gardens should be mostly soft landscaped, with limited paved surfaces. Where existing front gardens are proposed for conversion to parking, this is only appropriate when the majority of the garden will remain soft landscaped and there will be no loss of trees.</p> <p>Bound or unbound gravel surfacing to parking areas and private lanes/ alleyways is preferable to block paving.</p>
<p>Other</p>	<p>Maintain and enhance the character of the emerging Conservation Areas in line with the emerging Conservation Area Appraisals.</p>

5.11 Plotlands

Great Yarmouth includes a number of 'plotland' developments which originally grew up on marginal land in mostly seafront locations. Many are now threatened by coastal erosion and/or sea level rise but some remain well-loved and distinctive neighbourhoods with an unusual pattern and character. Some plotland areas now lie within coastal change management areas. Development proposals within this area type are typically small-scale infill development, on-plot replacement dwellings, extensions and alterations.

Area type characteristics:

- Distinctive typology of strongly gridded or geometric street and plot layout containing unique and varied self-build homes
- Typically low-density although some have a medium-density character due to small garden sizes.
- Access lanes are often unsurfaced, with informal, low-level boundary treatments
- Homes are typically chalet-style with gabled roofs to the street, with no repetition of house types along a street or within a plotlands area, due to the self-built nature of the original development. Homes are typically set back from the street or access lane and many have porches.
- Homes are all 1-2 storeys with few 3 storey homes.



Fig. 74. Photographs of plotlands at Scratby.

Design requirements:

Maximum / minimum densities / plot ratios (see also BF3)	Minimum 30 dwellings per hectare. Plot ratios for mixed-use development of 1 or over.
Development pattern (see also BF1 , BF2 and BF4)	Gridded street and plot pattern of detached homes on relatively small sized plots
Building line (see also BF2)	Buildings should be set back from the street and vary no more than 1m from the frontage line of neighbouring buildings.
Height and massing (see also BF1)	Predominantly 1-2 storeys. 3 storey development may be appropriate in locations where this does not dominate the streetscape and away from corners. Predominantly chalet-style forms with gabled roofs to the street, but a wide variety of building forms is encouraged. Uniformity of building design must be avoided, where a group of new homes or buildings is proposed.
Cycle and car parking (see also SM4 and SM5)	Cycle and car parking and storage must be provided on-plot.
Servicing (see also SM6 and BD7)	Refuse storage to be provided within front gardens/yards.
Street elevation design (see also CI4 , BD1)	Varied and individual design approaches are encouraged.
Boundary treatments (see also BD9)	Front boundary treatments should be low brick or flint walls, open timber picket or post-and-rail fencing, metal railings or native hedging – all below 1m high. Where side or rear gardens or yards abut the street, they should be bounded by hedging, post-and-rail fencing, or solid walls to 2m, in high quality materials e.g. brick or flint. Close boarded fencing to exposed side or rear boundaries is not acceptable.
Building design and materials (see also CI4)	Varied materials are acceptable and encouraged.

<p>Landscape design and materials (see also CC7, CC8, PS1-5)</p>	<p>Landscape design should incorporate SuDS features and all parking areas should use permeable paving.</p> <p>New gardens, and parking areas servicing commercial development, should include trees.</p> <p>Front gardens should be mostly soft landscaped, with limited paved surfaces. Where existing front gardens are proposed for conversion to parking, this is only appropriate when the majority of the garden will remain soft landscaped and there will be no loss of trees.</p> <p>Bound or unbound gravel surfacing to parking areas is preferable to block paving.</p>
<p>Other</p>	<p>Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals.</p> <p>Improvements to the quality of rear alleys and publicly accessible greens/courtyards in the block interior should be sought, to regularize the layout of parking, improve safety, add tree planting and create opportunities for functional use of the public realm.</p>

6 Design requirements by development type

6.1 New housing developments

New large-scale housing developments on the outskirts of existing settlements pose specific challenges and require careful design in order to create active and characterful communities.

The borough-wide requirements of the Design Code set out how new developments should be designed in detail, including building form, materials and details. The following points capture some of the priorities for new larger developments in terms of masterplanning and integration with context.

Relationship to landscape

- New housing developments are highly visible in the landscape. Layout and design should ensure they form a positive backdrop to views and in particular that boundary treatments to the edge of developments have a rural character. Fronting new development onto the landscape is not typical in rural settings and it is preferable for rear gardens to form the boundary to the rural landscape around the development. The use of close boarded fencing on to the landscape should be avoided, instead natural boundary treatments should be used. Walking and cycling routes should provide permeability to the landscape beyond as well as views out from the development to the rural landscape.
- The layout of new development should frame views of the open landscape beyond and link to the rural footpath network. Where possible, development should create new public rights of way that strengthen the footpath network and encourage appropriate active recreational use of the countryside.

Integration with 'host' community

- The layout of developments should integrate seamlessly with the network of streets and routes into the 'host' community and towards local destinations. These routes should be intuitive and direct, and create as much permeability for pedestrians and cyclists as possible, while preventing unwanted vehicle movement.
- Layouts should site functional public open space – including play and recreational facilities - in locations where it can be easily accessed by existing and new residents. Accessible natural greenspace should also be located where it can be used by the wider community.
- Larger developments which include local services and other non-residential uses should also site these to form natural meeting points between existing and new residents, and these should be designed to be high quality landmark buildings.

Pattern of development

- Development should draw on the built and landscape character of the 'host' community and avoid generic layouts and house types.
- In larger developments, individual streets or sub-areas should have differentiated characters which can be achieved through the use of different approaches to layout, house designs, or variation in materials and details. The aim should be to articulate a design identity for each street or cluster, through planned and coherent design.

- In urban settings, corner buildings may often be the more prominent and taller elements in the streetscape. However, in vernacular rural settings, corner buildings are rarely dominant and more substantial buildings typically form part of a continuous street frontage, are set back within grounds, or form a block to themselves. Corners should be carefully designed to work with the wider character of the development.

Phasing

- Phased development should ensure that green infrastructure and functional walking and cycling routes are built as early as possible in order to build in active lifestyles and encourage active travel for new residents from the start.



Fig. 75. Examples of common issues in new estate design in Great Yarmouth.

Top left: Close boarded fencing presents an unattractive edge to the open countryside.

Top right: Lack of street trees and areas of green verge which are not designed to allow for active uses such as play, seating, recreation. Extensive blank flank walls to the public realm should be avoided.

Bottom left: A lack of planting and street trees make new development bland and lacking in a distinctive identity; streets ending in close boarded fencing at the rear of adjoining gardens is unattractive and does not create permeability for pedestrians and cyclist; visible meter boxes detract from the quality of the streetscene; yellow brick is not typical of the local area.

Bottom right: rear parking areas are not well overlooked or sympathetically landscaped, making what could be a street fronted by dwellings into a 'dead space' only used by cars. Boundary wall is good quality and could be appropriate for a short length of boundary treatment, but not for a long boundary onto a public route.



Fig. 76. Examples of successful new-build housing development.

Top left: a contemporary reinterpretation of terraced cottages enlivened by imaginative use of local materials in Peterborough.

Top right: Well-landscaped public realm with trees complements contemporary housing at Accordia, Cambridge.

Middle left: varied roofscapes make simple forms lively, and brick enclosures successfully conceal refuse storage and air source heat pumps at St Chad's Thurrock.

Middle right: single-storey homes for the elderly create an attractive square enlivened by expressive chimneys at Barking. Architect: Patel Taylor. Bottom left: traditional terraces provide a good precedent for simple town housing at Vassal Road, London.

Bottom right: new housing with a lively use of materials and scale at New Hall, Harlow.

6.2 Infill development/redevelopment

Infill development and redevelopment of existing plots can make an important contribution to increasing the stock of homes in locations which already have good public transport, walking and cycling links, and can help sustain the viability of local shops and services.

The borough-wide requirements of the Design Code set out the standards that infill development should meet, and the area specific design requirements must also be followed. The following points capture some of the most important design considerations for infill development in terms of site planning and integration with context..

Making best use of land

- Infill development should take the opportunity to gently densify neighbourhoods without substantially altering their character. Creative site layouts, unit layouts and design of amenity space should be used to create backland and mews development which does not compromise the privacy and daylight/sunlight of neighbouring properties.
- Careful massing and roof form should be used to minimise the visual bulk of proposals. Daylight and sunlight modelling should be used at an early stage to inform the design and layout.

Relationship to adjacent properties and local character

- Building lines, external materials and the approach to boundary treatments must strictly follow the requirements set out for the character area. Adjacent properties may not form a suitable precedent if they are not of good quality design.
- Infill development is an opportunity to enhance and increase the distinctive character of a neighbourhood. Generic design approaches should be avoided and care taken to create elevations that are well-detailed, use durable and high quality materials, and complement the best examples from the wider area.

Landscaping

- The requirement to provide adequate parking can lead to sterile front curtilage areas in front of infill development. Front curtilage parking must include green features such as substantial trees, planting, and green roofs or climbing plants on carports and cycle shelters.
- Landscaping must maximise the use of SuDS features throughout. Permeable surfacing is expected for all on-plot parking.



Fig. 77. Examples of infill development where new development reinforces the scale, setback and active frontage of the street with parking provided to the rear, although choice of brick does not reflect the local material palette.

6.3 New industrial, commercial and retail development

Industrial, commercial and retail development fulfils important functions but, in out-of-town locations in particular, frequently fails to contribute positively to the character of the local area.

The borough-wide requirements of the Design Code set out design standards which apply to all forms of development. The following points capture some of the most important design considerations for out-of-town commercial development in terms of site planning and integration with context.

Site planning:

- Non-residential development should also follow sound masterplan principles and create a legible layout of streets and movement routes with a clear relationship to the active frontages of buildings. A perimeter block approach will typically be more successful in creating a sense of safety, enclosure and legibility than isolated buildings within parking.

Landscape design:

- Non-residential development generates a large car parking requirement and this must be designed to maximise the greening and SuDS opportunities. Tree planting should specify species that will grow to provide substantial canopy shade and be climate-resilient; permeable paving should be used; and all opportunities for introducing planting and biodiversity must be taken.
- Boundary treatments of non-residential development should use greening, such as climbing plants, to soften the visual impact of security fencing and to increase biodiversity on the site.
- Where external lighting is required, this should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.

6.4 Development in the rural area

A wide range of development takes place within the rural area, ranging from agricultural structures; farm diversification; business units; tourism; agricultural-to-residential conversions; and reuse of historic and listed buildings. While some forms of development can take place within permitted development rights, others require full planning permission, listed building consent or other consents.

The landscape of Great Yarmouth is open and relatively flat, so buildings and settlements are visible from long distances and even those of relatively modest scale form landmarks. The impact of rural development can substantially alter the landscape character.

The borough-wide requirements of the Design Code apply to development within the rural area and the following points capture some of the priorities in terms of integration with context.

Landscape setting:

- Long-range views must be considered and visualisations of proposals in context from publicly accessible viewpoints in the wider area submitted.
- Boundary treatments, and the incursion of domestic curtilages into the countryside, are highly visible due to the character of the local landscape. Soft boundary treatments such as timber post and rail fencing, native hedging and including tree planting where possible, should be used and close boarded fencing is not acceptable.

Building design and materials:

- Rural development should carefully consider materials, form and massing to maintain an agricultural and farmstead design language. Simple pitched-roof building forms are preferred.
- Materials should be predominantly good quality brick, flint or stone; timber weatherboarding; or profiled metal cladding in natural and darker tones. Light coloured materials are highly visible against the landscape and should be used with care.

Landscape design:

- Car parking areas can be highly visible within the rural area due to the long views. Parking areas must be very well landscaped and include trees which will, when mature, provide excellent canopy cover and shade.
- Where external lighting is required, this should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.



Fig. 78. Left: Harsh boundary treatments to isolated homes would be better designed as soft hedges or post and rail fencing, or low height wall. Right: new home in Lincolnshire is unobtrusive in the landscape and has a low boundary wall. Architect: Caruso St John.

6.5 Holiday Parks

Holiday park development forms an important part of the local economy. However these areas are typically situated close to significant natural landscape locations, therefore issues with these areas are primarily around boundary treatments to surrounding context and landscape.

The borough-wide requirements of the Design Code apply to holiday park development, where relevant based on siting and context, and the following points capture some of the priorities in terms of masterplanning and integration with context.

Landscape setting:

- Minimise recreational disturbance to natural wildlife/landscape locations through the design of the movement network/connection to green spaces as well as provision of suitable alternative natural green spaces for recreation.
- Ensure boundary treatments create a positive and attractive frontage to streets and to the countryside. Close boarded fencing is not appropriate for boundary treatments visible from the surrounding countryside or the public realm. Static caravans and lodges must be well-screened from public view points and the view from neighbouring homes and rights of way should be enhanced by extensive on-site landscaping
- External lighting should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.



Fig. 79. Examples of different boundary treatments to holiday parks.

Top left: the timber fence is less obtrusive than a tall close-boarded fence, but does not help to soften the boundary as the hedge does.

Top right: some holiday parks work well without a secure boundary treatment.

Bottom: due to the wide flat landscapes, holiday parks can be seen from long distances even though they are generally only single storey. Tree planting of large-scale trees would help to soften and screen the visual impact

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Consultation Statement

Great Yarmouth Borough- Wide Design Code

Supplementary Planning Document

January 2024



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1. Introduction

This document provides a summary of the consultation undertaken on the Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) under Regulation 12 of the Town and County Planning (Local Planning) Regulations 2012 (as amended). It provides the information required under Regulation 12 and 13 of the above-mentioned regulations. The document sets out:

- Which bodies and persons the local planning authority invited to make representations under regulation 12,
- How those bodies and persons were invited to make representations under regulation 12,
- A summary of the main issues raised by the representations made pursuant to regulation 12,
- How these representations have been taken into account in the production of the Final Draft SPD

The Great Yarmouth Borough-Wide Design Code was subject to continuous ‘informal’ consultation throughout its initial preparation to inform a ‘final draft’ supplementary planning document between September 2022 and May 2023.

This was conducted in accordance with the Council’s adopted Statement of Community Involvement (SCI), whereby the Council targeted specific groups and stakeholders with, and a vested interest in, the development of the built environment in the borough. This involved facilitating meetings and workshops with external stakeholders to shape the code’s core principles and detailed design guidance.

The range of workshops and meetings elicited a breadth of views and design considerations, and have been summarised, together with how they were addressed in the preparation of the ‘final draft’ supplementary planning document, in Section 2 of this consultation statement.

The final draft SPD was subject to a formal public consultation between 14th July 2023 and 8th September 2023. This public consultation was also extended by a further 4 weeks, officially closing on 13th October 2023.

In accordance with the Council’s adopted Statement of Community Involvement (SCI), direct notification of the formal public consultation was sent to:

- All Local Members
- Statutory and General Consultees on our Local Plan consultation database

A press release for the consultation was issued and articles advertising the public consultation, and its additional extension, were published in the Great Yarmouth Mercury. These articles can be accessed below:

- <https://www.greatyarmouthmercury.co.uk/news/23680947.say-future-great-yarmouth-developments/>
- <https://www.greatyarmouthmercury.co.uk/news/23777726.great-yarmouth-future-planning-framework-seeks-public-views/>

The SPD was available online and hard copies were available for inspection at the Town Hall, Hall Plain, Great Yarmouth, NR30 2QF throughout the duration of the public consultation period.

Hard copies of the SPD were also provided at all the local libraries within the borough for the duration of the extended public consultation period.

Comments to the consultation were accepted via post to Great Yarmouth Town Hall, or email to localplan@great-yarmouth.gov.uk.

During the final draft public consultation, 28 responses were received from individuals or organisations. These responses have been reproduced in Appendix 1. The main issues raised in the response, together with how they have been addressed in the preparation of the final version of the SPD is set out under Section 3 of this consultation statement.

The preparation of the Great Yarmouth Borough-Wide Design Code SPD was also guided throughout with the assistance of regular design code 'steering group', in partnership with officers from the Council's planning and conservation department, the Highways Authority, Lead Local Flooding Authority, Historic England and representatives from Norfolk County Council's Natural Environment Team.

2. Initial Consultation: Summary of main issues raised and how they have been addressed

This section summarises the main issues raised at each external meeting/workshop, setting out how they have been taken into account in the production of the Draft SPD.

Developer and Agents Forum – 14 October 2022

Summary of main issues raised

- Design Code should be tested for viability.
- Highways (NCC) is the main barrier to raising design quality – causing delays and demanding poor design solutions such as wide radius corners, footway crossings not on desire lines.
- Adoption of trees, SuDS, on-street parking is a challenge leading to too many parking courts.
- Difficult to find consultants with good skills in integrating SuDS, highways requirements and biodiversity.
- Welcome NDSS as standard but room sizes should not be specified as too much detail.
- Rear garden dimensions should be carefully considered so they are deliverable and compatible with density assumptions.

How issues have been addressed

- Discussions have been held with NCC Highways and the LLFA regarding design of highways and SuDS features – their feedback has been incorporated into the draft Design Code.
- NDSS and garden size guidance is included in the Design Code.
- Viability testing in detail is outside scope but the code follows best practice from elsewhere.

Active Norfolk Meeting – 22 November 2022

Summary of main issues raised

- Healthy Streets awareness should be raised.
- Design should prioritise the prevention of poor infrastructure (e.g., layouts not conducive to active lifestyles) rather than looking to compensate with activity equipment.
- Concern around the viability of development being an excuse for good quality design being avoided.
- Briefing on demographic and health inequalities within the borough given, highlighting that seafronts are not always used by residents, some of whom have never been to the beach despite living close by.
- References given to various sources of guidance produced by Active Norfolk and other related bodies.
- Desire for impactful measures not generic guidance.

How issues have been addressed

- All the main issues raised have been incorporated into the Design Code.
- Some matters raised are outside the scope of the Design Code – it is not possible to stipulate extremely detailed requirements or specific measures to be included within sites.

Natural England Meeting – 25 November 2022

Summary of main Issues Raised

- Importance of connecting people with nature for mental health.
- Design code should highlight opportunities for multi-functional green spaces and greening of building fabric e.g., roofs, walls.
- Reference new Green Infrastructure standards to be published by Natural England in January.
- Blue as well as green infrastructure to be considered.

- Trees guidance in the design code should emphasise importance of right tree for the climate, location, scale etc.
- Recreational disturbance of natural greenspace near holiday parks is a concern, design code should highlight requirement to control this and provide suitable alternative natural green-space.
- Disturbance is generally an issue from new development.
- Importance of linking and joining up habitats.
- Phased developments should consider what happens to land allocated for future phases as an 'interim' habitat.

How the issues have been addressed

- All the issues raised have been incorporated into the draft Design Code.

Parish Council Workshop – 28 November 2022

Summary of main issues raised

- Accessibility and connectivity of footpaths should be highlighted – connecting together rather than dead-ends.
- Concern around design of extensions and garage conversions which lead to parking on-street or on pavements.
- Concern generally around pavement and antisocial parking.
- Electric car charging should be included.
- Highways issues.
- A number of matters raised about specific developments that have already been constructed in terms of poor practice and design.

How the issues have been addressed

- All matters raised have been addressed in the Design Code, apart from matters falling within permitted development which is out of scope.

Great Yarmouth Civic Society Meeting – 29 November 2022

Summary of main issues raised

- Concern around town wall setting.
- Concern that historic town centre has been ruined by shopping centre developments.
- Issues with viability leading to poor quality or lack of development/redevelopment of sites.
- Local list of non-designated assets currently in discussion with Council.
- More trees should be planted.
- Concern around size of homes in new developments being too small.
- A number of specific heritage assets raised as issues.
- Would like to see Design Code address over-cladding and over-rendering of older and original features.
- Would like to see developers base designs off 'true' historical references rather than newer examples that are not in fact related to the local vernacular.
- Concerns around maintenance of features e.g., decorative wooden fascias that are not re-painted.

How the issues have been addressed

- Main issues raised have been addressed in Design Code development.
- Some site-specific comments not addressed as these fall into the development briefs and SPDs for regeneration sites.

Historic England Meeting– 1 December 2022

Summary of main Issues Raised

- Importance of highlighting below ground archaeology not just above ground heritage.
- Town centre intensification should be achieved and would welcome a modern reinterpretation of the 'Row' typology within Great Yarmouth town centre as part of redevelopment of vacant land/car parks.
- Design guidance should reference Historic England guidance.
- Design guidance should be practical and plain English.
- Good practice case studies suggested.
- Would like to see a good evidence base for characterisation. Concerned that Conservation Area Appraisals are not published or adopted.
- Would like to see design coding for roof form and height.
- Feel colour guidance would be too prescriptive.

How issues have been addressed

- All the main issues have been incorporated into the Design Code where within scope.
- Evidence base for characterisation has taken a proportionate approach within available resources and Conservation Area Appraisal reviews or adoption are not within scope of the Design Code.

Developer and Agents Workshop – 31 January 2023

Summary of main issues raised

- Interpretation of highways guidance is sometimes contradictory and inconsistent.
- The 'market' wants homes in cul-de-sacs not a more networked street pattern.
- Neighbour disputes can arise from shared parking areas.
- Choice and availability of materials is an issue when attempting to reflect local materials and vernacular.
- Welcome using NDSS as the space standard.
- Rigid guidance on back-to-back distances/overlooking would be problematic to implement.
- Standards for amenity space should take account of proximity of good quality public open space.
- Lower design speeds accepted by Highways authority would assist in producing better design.
- Adoption of SuDS and street trees is a barrier to including them in schemes.
- Would like to have lower parking ratios but Highways authority will not accept that walking and cycling can be used instead of the car.
- Future Homes Standards should be met.
- Residents like close boarded fencing.
- Would like to see mandatory energy efficiency and low/zero carbon technology standards.

How the issues have been addressed

- Issues raised have been addressed in development of the design code.
- Some matters raised have been balanced against wider design considerations.
- Guidance has been developed to address concerns around over-prescriptive approach and aims to allow alternative approaches to be taken while giving clear guidance on acceptable design solutions.

Norfolk County Council Meeting (Highways, LLFA & Natural Environment Team) – 27 February 2023

Summary of main issues raised

- Species for trees should not be too narrow a list as this leads to over-reliance on a few species – poor biodiversity and lack of identity.
- TDAG guidance should be referenced.
- Conflicts between paved areas, overground and underground utilities etc should be considered when planting street trees.
- Trees and SuDS can be adopted if appropriately designed.
- Primary streets should have SuDS both sides.
- Road safety with trees needs to be addressed.
- The 'Homezone' term is problematic and will not be supported in formal terms i.e., through TRO. However shared multi-functional living streets is supported in principle.
- Further feedback and guidance will be supplied by email.

How the issues have been addressed

- Matters raised have been addressed in the development of the Design Code.
- Further advice on species has been incorporated.

3. Final Draft Consultation: Summary of main issues raised and how they have been addressed

This section sets out the main issues raised by each respondent at each relevant section of the draft SPD and how they have been considered in the final version of the SPD.

Section 1.2: Status of the Design Code

Summary of Main Issues Raised

- Bourne Leisure (via Lichfields) – Seeks assurance that design code would be subject to further consultation if brought forward through the new Local Plan or future Supplementary Plan
- K. Newnham – Objects to Design Code taking precedence over adopted Neighbourhood Plan Design Codes
- K. Newnham – Queries the potential reforms of the planning system.

How issues have been addressed

- It is confirmed that if the Design Code is brought forward through the new Local Plan or a new Supplementary Plan it would be subject to further consultation in line with the appropriate Town and Country Planning regulations.
- The Design Code is clear that for areas where a Neighbourhood Plan has been made and includes design policies or neighbourhood design code, this will take precedence over the Design Code SPD, should there be a conflict. No changes are considered necessary to the SPD.
- Since the Design Code was prepared, planning reforms set under the Levelling-up and Regeneration Bill have since come into law and requires all planning authorities to produce design codes for its area, either through a Local Plan or Supplementary Plan. Reference to the Levelling Up and Regeneration Act (2023) has been updated in Section 1.2 of the introductory section.

Section 1.4: Structure of the Design Code

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers there to be a contradiction in the way ‘expected’ criteria of the code are interpreted, in that they are not ‘required’ but requires applicants to demonstrate why non-compliance would not be feasible or appropriate. It was also further suggested that as the majority of the codes are not ‘required’ and not covered by adoption national or local policy, there is no planning basis for developers to justify which that have not implemented such codes in their schemes. It was reiterated that the purpose of Supplementary Planning Documents is to provide further detail on the implementation of adopted policies, and not introduce new and more onerous requirements on applicants. It was suggested that the definition of ‘expected’ should be amended to make it clear that this is not a requirement for all new development, but examples of good practice that applicants will be encouraged to explore.

How issues have been addressed

- The code provides additional detail on how to comply with the policies set out in the Local Plan and does not introduce new policy, but provide a practical guide to what would be considered to constitute policy compliance.
- As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal, and in some cases, applicants may demonstrate that it would be unfeasible or unviable to be fully policy compliant in every detail, or that betterment can be achieved via a different approach.

However, the onus is on the applicants to justify their approach in these cases. It provides a practical guide to what would be considered to constitute policy compliance.

- All 'required' standards are based on national or local policy requirements, therefore all development should comply with these standards unless there are strong planning reasons to justify an alternative approach. As such, these 'required' elements carry the most weight in the assessment of the planning balance.
- All 'expected' standards are recognised approaches to meeting the expectations of policy. Other ways of demonstrating compliance may be acceptable but will need to be assessed on a case-by-case basis.
- Section 1.4 'Structure of the Design Code' has been amended to further clarify the above points.

Section 1.5: How to use the Design Code

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Largely repeats earlier comments that Supplementary Planning Documents should not introduce new planning policies and should contain policies that are clearly written so it is evidence how a decision maker should react to development proposals.

How issues have been addressed

- The code provides additional detail on how to comply with the policies set out in the Local Plan and does not introduce new policy, but provide a practical guide to what would be considered to constitute policy compliance.
- As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal, and in some cases, applicants may demonstrate that it would be unfeasible or unviable to be fully policy compliant in every detail, or that betterment can be achieved via different approach. However, the onus is on the applicants to justify their approach in these cases. It provides a practical guide to what would be considered to constitute policy compliance.
- All 'required' standards are based on national or local policy requirements, therefore all development should comply with these standards unless there are strong planning reasons to justify an alternative approach. As such, these 'required' elements carry the most weight in the assessment of the planning balance.
- All 'expected' standards are recognised approaches to meeting the expectations of policy. Other ways of demonstrating compliance may be acceptable but will need to be assessed on a case-by-case basis.

Section 2.1: Landscape character, coastal change, and flood risk

Summary of Main Issues Raised

- Broads Authority – Suggest amending reference to Broads Authority as 'equivalent' to national park.

How issues have been addressed

- Agreed. The relevant text has been amended as suggested.

Section 2.3: Local Building Materials

Summary of Main Issues Raised

- Historic England – Generally supports section but consider enhancement through inclusion of photographs showcasing material palette and examples of buildings using the materials.

How issues have been addressed

- Fig.2 (Figure 3 in final version) now includes examples of commonly used material pallets in the general area.
- Section 2.3 has been updated to provide additional detail on local building materials.

Section 2.4: Historic designations and assetsSummary of Main Issues Raised

- Historic England – Should include details of number/types of heritage assets across the Borough for local context. Also need to mention in text that heritage assets can be harmed (and enhanced) by development within their settings.
- K. Newnham – Maps on pages 11, 12, 13 and 14 are not clear and should be improved.

How issues have been addressed

- Section 2.4 has been updated to include general statistics regarding heritage assets to provide further historic context.
- Section 2.4 has been updated to reference that heritage assets have potential to be harmed and enhanced by development within their setting.
- Maps on pages 11, 12, 13 and 14 (pages 13-15 in final version) are at a high resolution. However, links to each mapping source has been provided within each caption for greater accessibility.

Section 3.1: Design VisionSummary of Main Issues Raised

- NCC Public Health – Design vision should include reference to supporting healthy behaviours and reducing health inequalities.

How issues have been addressed

- Bullet point 4 of the Design Vision and the ‘Why is design important’ dialogue box has been updated to reflect comment.

Section 4: Borough Wide Design RequirementsSummary of Main Issues Raised

- Bourne Leisure (via Lichfields) – The borough-wide design requirements principally relate to residential development; therefore, greater clarity is required in the text that not all requirements will apply to other types of developments e.g., Holiday Parks.

How issues have been addressed

- It is acknowledged that the borough-wide design requirements, whilst applying locationally across the borough, may not be relevant for all proposals. Section 1.5 already clarifies this; however, it is agreed that this could be strengthened, and this has been reflected under the borough-wide design requirement under Section 1.4.

Section 4.1: Addressing Climate Change and Conserving ResourcesSummary of Main Issues Raised

- NCC Public Health – Section should reference the health benefits of addressing climate change, for example active travel supporting physical activity.
- Natural England – Generally supportive of design code requirements and suggests including guidance for constructed wetlands (Introduction to Freshwater Wetlands for Improving Water Quality) to be included within the Useful Resources section.
- Broads Authority – Grammar correction. Insertion of “needs to address” in first sentence.
- Anglian Water – Include additional bullet point to reference to maximising water efficiency in new developments and regeneration/redevelopment of existing urban areas.

- Lead Local Flood Authority – Seeks removal of NCC Highways SuDS Adoption Guide under ‘Useful Resources’ section and replace with reference to LLFAs Developer’s Guidance document <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

How issues have been addressed

- Whilst the linked health benefits from addressing climate change is recognised, this is not considered to be the aim of the Design Code.
- The Useful Resources section of this part of the design code has been updated to reflect both the LLFA and Natural England’s comments.
- It is not considered necessary to add an additional requirement to ‘maximise water efficiency...” within this section as this is already considered to be sufficiently addressed through CC4.
- Typographical corrections have been updated throughout the document.

Section 4.1: Ensuring walking, cycling and public transport are the natural modes of travel for all users (CC1)

Summary of Main Issues Raised

- Sport England – Generally supportive of hierarchy of travel approach described under CC1, SM1 and SM2. Consider using term ‘active travel’ in the requirement to align with NMDC, NDG and AD3 (Active Design Guide). Suggests consideration given principle 4 in AD3 which refers to:
 - Avoid uniform ‘zoning’ of large areas to single uses.
 - Create mixed use, connected focal points in prominent places within a community.
 - Co-locate sport and recreation facilities alongside complementary uses.
 - Use the public realm to create informal activity at sports/recreation facilities.
- Broadland Housing Association (via Bidwells) – Considers that the CC1 criterions should not be “expected” as they go beyond adopted policy and are unqualified and don’t provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmark.
- Persimmon Homes – Considers that with reference to parking quantity/location, the Council should demonstrate how they will achieve cooperation from the highway authority to avoid uncertainty/delay in development delivery.

How issues have been addressed

- The principles of Active Design are considered to be fully embedded within the relevant design code criterions.
- It is disagreed that the ‘expected’ code criterions go beyond adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS1(e), CS9(d), CS9(h) and CS16 to help encourage healthy lifestyles and support sustainable transport options. It is considered that the first and fourth ‘expected’ criterion can be clearly assessed through any submitted layout of a scheme. The second and third ‘expected’ criterion have been amended to provide additional clarification on the interpretation of the criterions. There may be other acceptable ways of demonstrating compliance but these will need to be assessed on a case-by-case basis.
- In terms of parking, the design code has been prepared in co-operation with the highway authority throughout its development to ensure that it, as far as possible, mutually meets requirements and expectations.

Section 4.1: Minimising active heating and cooling requirements through passive design (CC2)

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Design Code needs to be mindful that is not always viable to just include single aspect homes when balanced alongside daylight/sunlight considerations. Flexibility required in the SPD.
- Broadland Housing Association (via Bidwells) – Considers that the CC2 criteria should not be “expected” as they go beyond adopted policy, and already addressed through Policy CS12. Considers requirements are unqualified, potentially contradictory to Building Regulations and don’t provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmark.
- Broads Authority – reference to Figure 7, noted that lots of glazing can cause light pollution issues as well and needs to be mitigated.

How issues have been addressed

- The McCarthy & Stone representation is misinformed as the ‘expected’ criterion does not seek to include single aspect homes.
- It is disagreed that the ‘expected’ code criteria go beyond adopted policies, nor contradictory to Building Regulations. These provide recognised qualitative approaches to aid the interpretation of Policies CS12 and A2(f) to improve energy efficiency of residential and non-residential buildings. It is considered that the ‘expected’ criteria through 1 to 4 can be clearly assessed through any submitted layout and design of scheme. Criterion 5 can be assessed through the discharge of conditions regarding the details of windows. There may be other acceptable ways of demonstrating compliance, but these will need to be assessed on a case-by-case basis.
- Fig 7 (Figure 9 in final version) has been amended to clarify the relationship between glazing and potential light pollution issues.

Section 4.1: Integrate on-site renewable energy generation and low and zero carbon heating, cooling, and ventilation systems (CC3)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the CC3 criteria should not be “expected” as they go beyond adopted policy. Considers that design code should focus on design matters such as location, potential nuisance, visual impact etc rather than, for example, providing air source heat pumps. Suggests amended code to reflect design elements.

How issues have been addressed

- Whilst Policy CS12 and A2(f) seek to improve the energy efficiency of residential and non-residential buildings, it is agreed that specific use of heat pumps are not sought through the existing adopted policy. The ‘expected’ criterion has therefore been amended as a ‘best practice’ consideration to be applied “where practicable”.

Section 4.1: Minimise potable water use (CC4)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that CC4 does not relate to priority aspects of design and is already covered by adopted policy. Suggests that code doesn’t provide any advice on how restriction of 110 litres per person should be incorporated into schemes. Suggests removal or further information to demonstrate how proposal can meet the water efficiency target.

- Anglian Water – supports inclusion within code. Recommends minimum standard of 100 litres per person be included in the code which to align with the Government Environmental Improvement Plan.

How issues have been addressed

- It is disagreed that the ‘required’ provides unnecessarily duplication of adopted policy but provides clarity for users of the design code on local policy requirements. Policy CS12(f) encourages all new non-residential developments to use water prudently and make greater use of existing and emerging water recycling and storage technologies. The ‘expected’ criterion has therefore been amended to ensure this relates to non-residential uses only. Integration of rainwater harvesting and greywater reuse to reduce potable water use for residential developments has been amended as ‘best practice’ only. It is considered that compliance with the ‘required’ code is relatively straight forward to achieve through the correct specification of fittings. The ‘expected’ criterion can also be easily achievable through design.
- Whilst higher water efficiencies standards beyond 110l/pp/pd for residential uses are being proposed in several other Local Plans, this goes beyond the existing policy requirement in the adopted Great Yarmouth Local Plan, therefore it cannot be reasonably expected through the Design Code.

Section 4.1: Reduce embodied carbon emissions resulting from construction (CC5)

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Considers that introducing embodied carbon policy must not be inflexible as it may introduce a financial burden and deem site unviable. Cites that new development often more sustainable through fabric first, MMC and sustainable optimisation of site. Seeks availability of embodied carbon figures through an Environmental Product Declaration.
- Broadland Housing Association (via Bidwells) - Considers that the CC5 criterions should not be “expected” as they go beyond adopted policy. Considers requirements are unqualified and don’t provide benchmark by which to be assessed. Suggests removal or flexibility to ensure requirement is practical and feasible.
- Anglian Water – Supports inclusion in code.

How issues have been addressed

- Whilst a key tenet of the adopted Local Plan is to seek the minimise the impact of development upon the environment, it is agreed that as this relates to a Strategic Objective, rather than an adopted policy, that the ‘expected’ criterion be amended as a ‘best practice’ standard only.

Section 4.1: Ensure development is flood safe and flood resilient (CC6)

Summary of Main Issues Raised

- Lead Local Flood Authority – Seeks inclusion of compliance with LLFAs guidance within expected requirements.
- Broadland Housing Association (via Bidwells) - Considers that the ‘required’ CC6 criterion does not relate to priority aspects of design and already covered by adopted policy and would need to be addressed as part of any application with regards to comments from LLFA and Environment Agency. It was further suggested that the ‘expected’ CC6 criterions go beyond the requirements of adopted policy. Suggests removal of all code requirements.

How issues have been addressed

- It is disagreed that the ‘required’ standard doesn’t relate to priority aspects of design. It clearly relates to relevant design considerations listed under BD1, BD3 and CC7 which should

be expected to be considered and addressed to ensure developments in areas at risk of flooding are well designed to be flood safe and resilient.

- In terms of the 'expected' criterion which consider salt tolerant materials – this is a generally poorly addressed area within national guidance which is generally drafted to address fluvial (non-tidal) flood risk. However, in tidal areas, salt resistance is a consideration. Notwithstanding, it is accepted that this should be considered as 'best practice' and the design code has been updated to reflect this.
- The 'expected' criterion has been updated to reflect the need to ensure that applicants also check compliance with the LLFA guidance.

Section 4.1: Reduce the risk of surface water flooding on and around the site (CC7)

Summary of Main Issues Raised

- Water Management Alliance – References Internal Drainage Boards are regulators of ordinary watercourses. Suggests that the Board's regulation should be referenced within the code requirement.
- Broadland Housing Association (via Bidwells) – Considers that the 'required' criterions doesn't relate to the priority aspects of design and would need to have regard to comments from LLFA in relation to SuDS hierarchy. Considers that remaining 'expected' criterion of the code are not necessary as go beyond adopted policy, unqualified and don't provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmarks.
- Anglian Water – Supports inclusion of code requirement. Recommends that the multi-functional and integrated aspects of SuDS should also include reference to rainwater/stormwater harvesting and reuse in new developments under the 'expected' criterion.
- Lead Local Flood Authority – Considers that the 'required' criterion should be amended to ensure that the LLFA's Developer Guidance is appropriately applied to all developments for surface water management as this is consistent with National Planning Policy.
- Hemsby Parish Council – Parish Council wishes to see fences over knee height to deter children from playing in/around SuDS.
- K. Newnham – Supports the indicative examples of SuDS provided under Fig 9.

How issues have been addressed

- Reference to the Internal Drainage Boards requirements is a regulatory matter than will typically be addressed through the planning process and therefore not necessary to specifically include within the Design Code.
- It is disagreed that the 'expected' criterion are unqualified or unclear. The LLFA have been engaged throughout the preparation of the Design Code and have agreed the wording of this section. It is considered that providing quantitative standards for an aspect of design which needs to be approached in a holistic and integrated manner will not result in the most appropriate design response. The aim is to encourage an integrated SuDS approach that maximises the attenuation of surface water and results in a high-quality landscape design and the wording is clear in this regard. The Code closely follows the SuDS hierarchy set out in other guidance e.g., CIRIA SuDS manual and similar.
- The 'expected' criterion has been updated to provide greater clarity on the use of rainwater/stormwater harvesting and reuse in new developments.
- Whilst it is agreed that the LLFA's guidance and run-off rates should be considered, there may be instances where a departure is locally justified. Therefore the 'required' criterions have been amended as 'expected' rather than 'required'.

- For better consistency with the CIRIA guidance, the 7th ‘expected’ criterion has been amended to seeks to avoid fences around SuDS features such as ponds and watercourses through design of gradients and depths, and the use of natural planting as a barrier.

Section 4.1: Reduce urban heat island effect (CC8)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) - Considers that the CC8 criterions should not be “expected” as they go beyond adopted policy. Considers that the requirements of the code don’t provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmarks.

How issues have been addressed

- Whilst a key tenet of the adopted Local Plan is to seek to minimise development impacts on the environment, including designing developments to be more resilient to climate change, it is agreed that as this relates to a Strategic Objective rather than an adopted policy, that the ‘expected’ criterion be amended as a ‘best practice’ consideration only.
- However, it is recognised that additional guidance and/or benchmarking under this criterion would be helpful as generally an area of design that is not as well-informed in practice than others. This section of the design code has also been updated to an additional case on the importance of reducing the urban heat island effect.

Section 4.1: Minimising resource usage through future building maintenance, alterations, and adaption (CC9)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) - Considers that the CC9 criterions should not be “expected” as they go beyond adopted policy. Considers that the requirements of the code don’t provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmarks.

How issues have been addressed

- Whilst it is considered that the criterions provide recognised qualitative approach to aid the interpretation of one of the adopted Local Plan’s Strategic Objectives, it is agreed that as this does relate to an adopted policy, that the ‘expected’ criterions be amended as ‘best practice’ standards only. It is considered that the criterions can be adequately considered and demonstrated through information such as an accompanying Design and Access statement.

Section 4.2: Context and Identity

Summary of Main Issues Raised

- Historic England – Welcomes references to historic environment and heritage assets within section and requirements under CI1, CI2 and CI3.
- Natural England – Considers that an updated Landscape Character Assessment would provide a useful evidence base to assess opportunities to conserve and enhance the built and natural environments and record areas where there has been deterioration since last assessment.

How issues have been addressed

- It is not considered necessary to update the Council’s Landscape Character Assessment as the landscape has not changed substantially since the previous LCA was undertaken.

Section 4.2: Design with regard to local context, including the surrounding built environment, topography, landscape, and drainage (CI1)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Supports the general principle of the ‘required’ criterion but considers that the remaining criterions are not necessary as they go beyond adoption policy. Suggests removal of ‘expected’ criterions.
- Anglian Water – Supports general reference to drainage in the code but seeks further reference within the ‘required’ and ‘expected’ criterions to ensure that the topography/landform and soils on a site are considered at the outset as these inform the strategic placement of SuDS and integrated water management opportunities.

How issues have been addressed

- It is disagreed that the ‘expected’ code criterions go beyond adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A2(a), CS9(a) and E5 to ensure design of new developments have regard to local context.
- The ‘required’ criterion has been amended to reference topography, underlying soils and geology when analysing the site context.

Section 4.2: Conserve and enhance the significant of heritage assets (CI2)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Suggests that the ‘expected’ code requirements should be upgraded to ‘required’ for consistency with other design code contained within the document. However, in the round it was considered that to prevent duplication of existing policy that the code should be removed.

How issues have been addressed

- It is disagreed that the criterion should be promoted to ‘required’. There is no higher-level policy in the adopted Local Plan which would support this to become a ‘required’ standard for example Policy E5 does allow an element of flexibility i.e. loss in certain circumstances.

Section 4.2: Create a positive and distinctive sense of place for new developments (CI3)

Summary of Main Issues Raised

- Badger Building – Considers the code to be overly prescriptive and therefore questions how much inherent flexibility will be allowed to create a distinctive and place specific identity. It was also suggested that the code impractically restricts standards house types, citing their actual flexibility to respond to a variety of locations and layouts, and potential shortcomings in the perceived conversion of mass building of homes into mass building of custom-built homes.
- Lead Local Flood Authority – Seeks amendment in code to include reference to SuDS which supports the creation of a positive and distinctive sense of place and also supports one of the four pillars of SuDS (amenity).
- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criterion of CI3 is already covered by adopted policy and should be removed to prevent duplication. Considers the remaining ‘expected’ criterions as not necessary as they go beyond adopted policy and don’t provide a benchmark for assessment.
- Persimmon Homes – Seeks greater clarity on definition of ‘character areas’ e.g., what they entail, what stage of development that is would be given weight on. Citing problems with disjointed clusters and jarring incompatible design features if required in phases within a large-scale development.

How issues have been addressed

- The Design Code is not considered to be prescriptive and requires applicants to take a site-specific approach, whilst ensuring that the core principles of achieving good design are duly considered and set out in a Design and Access statement to clearly explain how the site and context and the requirements of the design code has been taken into account. The design code acknowledges that some flexibility will be necessary when determining proposals and that some requirements may need to be balanced against each other where it is demonstrated by the applicant which it may or may not be feasible or appropriate to achieve.
- The Design Code does not restrict the use of 'standard house types' but seeks to ensure that the design of all house types have regard to the local context and contribute towards local distinctiveness.
- It is disagreed that the 'required' criterion provides unnecessarily duplication of adopted policy but provides clarity for users of the design code on local policy requirements.
- It is also disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS9(b) and A2(b) to ensure design of new developments creates a positive and distinctive sense of place and identity. It is considered that the 'expected' criteria can be adequately considered and demonstrated through information such as a Design and Access statement which must demonstrate how a proposed development's context has influenced the design.
- The criterion has been updated to make it clearer that including different character areas should also be addressed at the outline application stage as part of a master planned approach and can be achieved through the use of different approach to layout, house design, or variation in materials and details.
- It is agreed with the Lead Local Flood Authority. The first 'expected' criterion has been amended to include reference to landscaping and including SuDS.

Section 4.2: Use external materials and detailing which complement the local context and are appropriate for the local climate (CI4)Summary of Main Issues Raised

- Historic England – Welcomes requirements that new development should use materials and details which reflect the local vernacular, however it is considered that there might be a potential conflict with requirement that the materials and details used must be robust and suitable for the local climate. It is suggested that the text is amended to encourage consideration of the maintenance implications associated with these materials.
- Badger Building – Considers that quality materials, such as replacing plastic windows often command higher prices and that this could significantly affect build costs and viability.
- Broadland Housing Association (via Bidwells) - Considers that the CC4 criteria should not be "expected" as they go beyond adopted policy. It was also considered that the criterion largely repeats CI1 and therefore questions the need for the requirement. It was suggested that the code requirement be removed.
- Hemsby Parish Council - The Parish Council did not consider exterior materials to be in alignment with the Hemsby NHP i.e., windows, roofing, or cladding materials.

How issues have been addressed

- Whilst Historic England's comments are noteworthy, vernacular materials are generally robust, for example hydraulic lime render can be as robust as cement. Therefore, it is not considered necessary to update to reflect comments.
- It is acknowledged that the non-use of uPVC when replacing windows, doors etc may have cost implications, and their use may be an appropriate material in specific circumstances.

The criterion has been amended to remove reference to uPVC windows, doors, fascias and cladding as not being general acceptable.

- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS9(a) and A2(b) to ensure the use of external materials in the design of new development complement the local context and help to foster a design identity.
- It is disagreed that the Design Code CI4 repeat CI1. CI4 is focused upon the ensuring the chosen approach to materials responds to local context, whilst CI1 deals with matters relating to general site layout and massing.
- The Design Code has been prepared at a borough-wide scale; therefore, it is unable to be prescriptive on the exact types of likely appropriate materials in every area of the borough, including Hemsby. Notwithstanding, the Hemsby NP specifies similar materials to the GY Design Code, therefore they are regarded as being generally compatible. Materials suitable for inland and historic village centres can be found in Section 5.10.

Section 4.3: Streets, movement, and parking

Summary of Main Issues Raised

- K. Newnham – Considers it a mistake to reduce vehicle parking as it would lead to a 'park anywhere' situation. Considered that well-meaning attempts to change car habits to cycles and buses will take time. Suggested that one allocated parking space be provided outside the house and several smaller areas for additional unallocated parking to cover visitors and other family members.

How issues have been addressed

- It is considered that the above comment is aligned with the design code approach which suggests development should include a range of different parking area and types including on-plot, on-street and shared unallocated parking. It also specifies that the landscape design should physically prevent 'park anywhere' behaviour through careful placement of street trees, street furniture, SuDS features and similar.

Section 4.3: Create a walkable and integrated network of street and pedestrian/cycle routes (SM1)

Summary of Main Issues Raised

- Sport England – Generally supportive of hierarchy of travel approach described under CC1, SM1 and SM2. Consider using term 'active travel' in the requirement to align with NMDC, NDG and AD3 (Active Design Guide). Suggests consideration given principle 4 in AD3 which refers to:
 - Avoid uniform 'zoning' of large areas to single uses.
 - Create mixed use, connected focal points in prominent places within a community.
 - Co-locate sport and recreation facilities alongside complementary uses.
 - Use the public realm to create informal activity at sports/recreation facilities.
- Broadland Housing Association (via Bidwells) – Considers that the 'required' criteria are not necessary as these duplicate adopted policy. Considered that the 'expected' criteria are not necessary as they go beyond adopted policy, are unqualified and don't provide a benchmark for assessment. It is suggested that the code requirements are removed, or further information provided on how proposals will be required to achieve this in practice.

How issues have been addressed

- The 'expected' criterion has been updated to ensure that new walking and cycling routes connect to local destinations and encourage active travel.
- It is disagreed that the 'required' criterion unnecessarily duplicates adopted policy but provides clarity for users of the design code on local policy requirements.

- It is also disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies GSP7, CS9(d) and A2(d) to ensure that the layout of developments provide convenient routes for pedestrians and cyclists and are designed around a clear hierarchy of streets. These are considered to be duly qualified as they accord with the principles of Manual for Street and Norfolk County Council’s acceptable highways standards. It is considered that the ‘expected’ criteria can be adequately considered and demonstrated through information such as a Design and Access statement which must demonstrate how a proposed development can be adequately accessed by all prospective users.

Section 4.3: Design movement routes to clear and consistent standards which prioritise vulnerable users, children, pedestrians, and cyclists (SM2)

Summary of Main Issues Raised

- Badger Building – Questions whether the Highway Authority has signed up to the Design Code and whether they will be providing a suitably modified technical document covering the necessary highway design amendments to deliver the new design agenda. It was reiterated that there must be 100% buy in on the Design Code from the Highway Authority.
- Lead Local Flood Authority – Considers the opportunity to include the use of SuDS to help separate vulnerable users from trafficked areas, such as the use of raingardens.
- Sport England – Generally supportive of hierarchy of travel approach described under CC1, SM1 and SM2. Consider using term ‘active travel’ in the requirement to align with NMDC, NDG and AD3 (Active Design Guide). Suggests consideration given principle 4 in AD3 which refers to:
 - Avoid uniform ‘zoning’ of large areas to single uses.
 - Create mixed use, connected focal points in prominent places within a community.
 - Co-locate sport and recreation facilities alongside complementary uses.
 - Use the public realm to create informal activity at sports/recreation facilities.
- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criteria are not necessary as these duplicates adopted policy. Considered that the ‘expected’ criteria are not necessary as they go beyond adopted policy, are unqualified and don’t provide a benchmark for assessment. It is suggested that the code requirements are removed, or further information provided on how proposals will be required to achieve this in practice.
- Persimmon Homes – Considers the example street layout diagrams bear no resemblance to the established development patterns in the borough and would be contrary to the aspirations set out under Section 6.1. They also consider there to be conflicts between the Council’s objectives and those of the Highway Authority in terms of parking, circulation, road/street requirements, servicing, and safety. It was also considered that LTN1/20 is only applied to main distributor roads and that there is conflict between it and Manual for Streets. It was suggested that it should be made clear throughout this section of the Design Code what policies/guidance take precedence.

How issues have been addressed

- The Design Code has been prepared with the oversight of a steering group which includes the Highway Authority to ensure that there is no material conflict between relevant guidance and processes. The Highway Authority are fully supportive of the principles of the Design Code. To provide clarification, the introductory section of the design code has been updated to reference the preparation of the design code and involvement of the steering group.
- The use of SuDS as an example of helping to separate vulnerable users from trafficked areas is already included in the Design Code.

- It is disagreed that the ‘required’ criterion unnecessarily duplicates adopted policy but provides clarity for the users of the design code on local policy requirements.
- It is also disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS9(d) and A2(d) to ensure that the design of movement routes prioritise non-car modes of transport. These are duly qualified as they accord with the principles of Manual for Streets. It is considered that the ‘expected’ criteria can be adequately considered and demonstrated through information such as a Design and Access statement which must demonstrate how a proposed development can be adequately accessed by all prospective users.
- The example diagrams provided within the section are in accordance with the National Model Design Code, MfS, LTN 1/20 and other best practice guidance including adopted and implemented design codes from other areas. The design of new streets is not intended to directly replicate older street forms which were laid out in a very different era and with different priorities. The photographic examples included show that these kinds of new street designs can and do work very well and do not preclude compact, efficient forms of development and can be utilised in a range of layouts which reflect local urban grain and contexts.
- LTN 1/20 applies to all kinds of streets and spaces, not just main distributors. It is acknowledged that there is inconsistency in some of the detail of guidance produced at national and local level, due to guidance being produced at different times and not having been consistently updated. However, the basic principles are clear across all documents and the user hierarchy which prioritises pedestrians and cyclists applies. NCC Highways have been fully involved in the development of the Design Code and do not consider there is a conflict between the Design Code and their requirements.
- The ‘expected’ criteria has also been amended to ensure new streets should be designed in accordance with the street design principles illustrated within this section.

Section 4.3: Create multifunctional streets which contribute to creating vibrant and active communities (SM3)

Summary of Main Issues Raised

- Sport England – Generally supports the principle of the requirement as it accords with AD3 of Active Design.
- Broadland Housing Association (via Bidwells) - Considers that the SM3 criteria should not be “expected” as they go beyond adopted policy. It also considers that the requirements should not expect developments to follow homezone/Woonerf street principles as it could stifle, innovative design or impose unintended impediments on the ability to adopt highways infrastructure. It is suggested that the code is removed, or some flexibility required to ensure it doesn’t stifle innovation within design.
- Persimmon Homes – Considers that none of the examples provided within this part of the code include any local referencing, and it is unclear how these developments could assimilate to the established built form present in the borough. It was further added that there needs to be certainty from the Highway Authority that there would be no objections raised in terms of the integration of seating/informal play and application of parking standards on multifunctional streets.

How issues have been addressed

- it is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A2 and CS9 in encouraging people centred spaces. There are many ways of designing streets to be multifunctional and vibrant. Homezone and Woonerf street principles are indicative

examples of how these could be achieved and not a rigid approach. Norfolk County Council are supportive of the broad principles of developing shared spaces within developments.

Section 4.3: Ensure the amount and design of cycle parking and storage incentivises cycling on an everyday basis (SM4)

Summary of Main Issues Raised

- Sport England – Fully supportive of the guidance which incentivises cycling, however questions that this should not be restricted to residential uses only. It was also suggested that provision for showers and lockers should be included as part of the provision of cycle storage and associated facilities.
- Badger Building – Considers that the code requirement unrealistically assumes 100% bike ownership amongst the population. Government figures (2022) gives cycle ownership at 45% with usage levels at around 10% of population. Therefore even 75% requirement against bedspaces would be excessive.
- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criteria are not necessary as these duplicates adopted policy. It is also considered that the ‘expected’ criteria are not necessary as they go beyond adopted policy and would cause confusion with the adopted parking standards. It was also commented that the ‘expected’ and ‘best practice’ requirements don’t provide a benchmark for assessment. It is suggested that the code requirements are removed, or amendments required to ensure the criterion doesn’t conflict with adopted highway standards.
- Persimmon Homes – Considers the requirements to be extremely prescriptive and does not allow variation of house types or allow for flexibility due to space/density conflict. Suggested amendments include:
 - Under ‘expected’
 - For dwellings, provide resident cycle parking as per the NCC Minimum Parking Standards.
 - For HMOs, provide 1 resident cycle space per bed space, and 1 visitor space per dwelling (which can be uncovered and outside of a secure enclosure, e.g., a Sheffield stand).
 - For retirement housing, provide 1 secure resident cycle space, and one visitor cycle space, per two bed spaces. Many older people use cycles, and in particular e-bikes, for exercise and leisure.
 - Under ‘Best Practice’
 - For all residential cycle storage, provide one electric outlet per two cycle spaces to facilitate e-bike charging.
 - Provide adequate secure cycle storage to accommodate at least one cargo bike per dwelling.
 - Garages can be counted as allocated parking spaces for cycle storage where adequate on plot parking is provided.
 - Cycle storage can be within curtilage of dwelling but must be secure and covered e.g., cycle locker; dedicated store/shed; dedicated space within hallway/ secure porch; dedicated space within expanded garage.
 - Locate cycle storage closer to entrance doors, than car parking/ storage
 - Ensure cycle storage is secure and naturally overlooked to deter theft.
- Lead Local Flood Authority – Suggests that green roofs on bike storage should be encouraged, as those presented under Fig.24.

How issues have been addressed

- It is considered that cycle storage/parking for non-residential uses are already covered through this section of the design code. It is not considered that specifying showers/lockers would be within the purpose of the Design Code.

- With regards to cycling requirements, it is acknowledged that the ‘expected’ standards are higher than the NCC standards in some regards. This reflects the fact that cycling is not just one mode of transport but also a form of exercise, sport, and activity. Many people own more than one bicycle for different purposes and homes, particularly in rural areas such as Great Yarmouth, should be designed to accommodate enough cycles so that people of all ages can lead active and healthy lifestyles.
- It is acknowledged that as adopted local policies only requires ‘regard’ to be had to NCC parking standards, that ‘meeting’ NCC minimum requirements should be amended to an ‘expected’ criterion. This has been amended in the design code.
- It is also disagreed that the ‘expected’ criterion go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation Policy I1 and Policy CS9(e) to ensure the amount and design of cycle parking incentivises cycling on an everyday basis. Whilst it is acknowledged that the ‘expected’ standards are higher than NCC standards, this reflect the fact that cycling is not just one mode of transport but also a form of exercise, sport, and activity. Many people own more than one bicycle for different purposes and homes, particularly in the rural areas such as Great Yarmouth, should be designed to accommodate enough cycles so that people of all ages can lead active and healthy lifestyles.
- To provide additional flexibility in the ‘expected’ criterion with regards to cycle parking, the 6th ‘expected’ criterion has been amended to allow cycle parking to be accommodated within garages where it is large enough to accommodate as well as a car. The 9th ‘expected’ criterion has been amended to be relevant only where residential parking is not provided on-plot.

Section 4.3: Ensure that the amount and design of car parking and storage is adequate and designed to minimise antisocial parking (SM5)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criteria are not necessary as these duplicates adopted policy. Considered that the ‘expected’ criteria are not necessary as they go beyond adopted policy and would cause confusion with the adopted parking standards. It was also commented that the ‘expected’ and ‘best practice’ requirements don’t provide a benchmark for assessment. It is suggested that the code requirements are removed, or amended to provide further information on how proposals will be required to achieve the criterion in practice.
- Persimmon Homes- Considers that some of the ‘expected’ criterion are in conflict with each other e.g., “Include a mix of parking solutions (on-plot, on-street, shared parking areas/courts) to avoid a car-dominated environment.” Directly conflicts with: “Deter unplanned on-street parking through the design and layout of streets, and through inclusion and enforcement of parking restrictions.”. It was further stressed that there are serious concerns relating to reliance on on-street parking anywhere other than within the town centre as this raises uncertainty over parking ownership and lead to unplanned street parking. This is considered to directly conflict with NCC parking standards.

How issues have been addressed

- It is disagreed that the ‘required’ criterion unnecessarily duplicates adopted policy but provides clarity for the users of the design code on local policy requirements.
- It is also disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A2(d) and I1 on the design and provision of car parking. These are considered to be duly qualified as they accord with the principles of Manual for Streets and Norfolk County Council’s highway design principles. NCC Highways have been fully involved in the

development of the Design Code and do not consider there is a conflict between the Design Code and their requirements.

- It is considered that the 'expected' criteria can be adequately considered and demonstrated through the design and layout of submitted plans and information through a Design and Access statement.
- There is not considered to be any conflict within the different requirements of this part of the design code. Planning for on-street parking should form part of the parking mix and landscape design should prevent unplanned on-street parking. NCC Highway have been fully involved in the development of the Design Code and do not consider there is any conflict between the Design Code and their requirements.

Section 4.3: Ensure adequate and well-designed access for servicing vehicles (SM6)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the 'required' criteria are not necessary as these duplicates adopted policy. Considers that the 'expected' criteria are not necessary as they go beyond adopted policy would be required to have regard to NCC Highways. It was also commented that they do not provide a benchmark for assessment. It is suggested that the code requirements are removed, or amended to provide further information on how proposals will be required to achieve the criterion in practice.

How issues have been addressed

- It is disagreed that the 'required' criterion unnecessarily duplicates adopted policy but provides clarity for the users of the design code on local policy requirements. It is also disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy CS9(e) to ensure vehicular access is provided that is suitable for the use and location of the development.
- It is considered that the 'expected' criteria can be adequately considered and demonstrated through the design and layout of submitted plans and information through a design and access statement.

Section 4.4: Public open space, nature, and water

Summary of Main Issues Raised

- Norfolk County Council Public Health – Considers that local growing options such as allotments/ orchards can provide healthy food options.
- Natural England – Espouses the multi-functional benefits that urban green spaces can provide including managing environmental risks such as flooding and heatwaves and providing improved access to nature for public health benefits. It was suggested that inclusion of reference to the Norfolk Green Infrastructure Recreational Impact and Avoidance and Mitigation Strategy (GIRAMS) would be useful as this commits to deliver enhanced GI. It was further suggested that consideration should be given to protection of natural resources, air quality, ground, and surface water soils within urban design plans.

How issues have been addressed

- It is acknowledged that the provision of healthy food options is important, however this is not considered to be of direct relevance to the Design Code.
- The multifunctional benefits of urban green spaces are fully agreed with; however, it is considered that the existing criteria within Section 4.4. of the Design Code already provide consideration for such spaces.
- It is not considered necessary to reference the Norfolk Green Infrastructure Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) within the design code as it is felt that

this would be appropriately captured under existing local planning policies for relevant proposals.

- It is considered that the protection of natural resources, air quality, ground and surface water, soils etc are already considered through existing planning policies and do not need to be included within the Design Code.

Section 4.4: Integrate existing natural features, including water and trees, in site layouts (PS1)

Summary of Main Issues Raised

- Lead Local Flood Authority – Considers that a required criterion should indicate that existing watercourses must be retained and incorporated into the proposed design.
- Norfolk County Council Natural Environment Team – Advises that reference is made to the RTP/ RSPB best practice guidance Cracking The Code; How design codes can contribute to net-zero and nature’s recovery: Plan The World We Need (rspb.org.uk) and Site Level Design Code; Design Code for Net Zero and Nature Recovery: site-code_220317_compressed.pdf (rspb.org.uk)
- Broadland Housing Association (via Bidwells) – Considers that the PS1 criteria should not be “expected” as they go beyond adopted policy. It was also suggested that the criterion largely repeat criteria under CI1, or what would be covered under BNG policies. It is suggested that the code requirements are removed.
- Anglian Water – Supportive of a design-led approach that is framed and led by green and blue infrastructure opportunities and focusses on the existing environmental/natural assets present on the site, which helps to assimilate biodiversity net gains and positive benefits for surface water management.

How issues have been addressed

- Whilst the importance of seeking to retain and integrate existing ordinary watercourses is acknowledged, it may not always be possible to achieve. Notwithstanding, Design Code CI1 ensures that the design should have regard to local context which includes landscape and drainage.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS11, E4 and A2 to ensure existing natural features, including water and trees, are suitably considered, and incorporated within site layout. It is not considered that the criterion repeats CI1. PS1 is focused upon the ensuring a landscape led design approach is undertaken at an early stage of development design whilst CI1 deals with matters relating to general site layout and massing.
- Reference to RTP/RSPB design code best practice is not relevant as this concerns producing codes rather than providing additional detail for users of codes.

Section 4.4: Provide a sufficient quantity, type, and quality, of public open space and green infrastructure with development (PS2)

Summary of Main Issues Raised

- Broads Authority – typographical errors identified relating to the third ‘expected’ criterion.
- Sport England – Fully supports the principle of the requirements which accords with theme 2 of AD3 (Active Design). Also supportive of requirement to consider needs of all users in design of public spaces as these accords with overarching theme of AD3 (Active Design). Suggests that criteria could further to reflect principles 5 of AD3, namely:
 - Linking open spaces together within and beyond a site
 - Integrating a diversity of natural habitats to make environments where people want to be outdoors and active.

- Making space for children's play
- Broadland Housing Association (via Bidwells) – The 'required' criterion of the code is already covered by adopted policies including the Open Space SPD, highlighting the fact that it is not necessary and should be removed. The remaining 'expected' criterion of the code are not considered necessary as they go beyond adopted policy and it is not clear how such criterions will be benchmarked for assessment. It is suggested that the code is removed.
- Persimmon Homes - Seeks comfort in that if site circumstances can justify a departure from the Open Space SPD, some flexibility will be allowed.

How issues have been addressed

- It is disagreed that the 'required' criterion unnecessarily duplicates adopted policy or standards but provides clarity for the users of the design code on local policy requirements. To ensure the 'required' criterion is fully consistent with adopted policy, the criterion has been amended to reference parent policy H4 (Open space provision for new housing development). It is disagreed that the 'expected' criterions go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies GSP6 and H4 to ensure proposals provide sufficient quantity, type, and quality of open and green spaces. It is considered that the criterion can be adequately demonstrated through supporting layout plans and accompanying design and access statements.
- The Open Spaces SPD provides greater interpretation on the quantity of open spaces that are to provide under the auspices of Policy H4. Any departure from the requirements must be justified under provisions provided by Policy H4.
- Typographical corrections have been updated throughout the document.
- It is considered that further suggestions relating to principles of Active Design have already been sufficiently incorporated into the Design Code.

Section 4.4: Ensure public access to watercourses (PS3)

Summary of Main Issues Raised

- Sport England - Fully supports the principle of widening up accessibility to green and blue infrastructure. Consideration should also be given to how this will integrate with existing and other proposed active travel routes.
- Broadland Housing Association (via Bidwells) - Considers that the criterions should not be "expected" as they go beyond adopted policy and would be required to have regard to comments from the LLFA. Considers that the requirements of the code don't provide benchmark by which to be assessed. Suggests removal or amended to provide appropriate assessment benchmarks.
- Persimmon Homes – Seeks flexibility on this as access is dependent on ROSPA requirements, particularly where play spaces are being created.

How issues have been addressed

- It is disagreed that the 'expected' criterions go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS17(f) and CS9(a) to ensure access to watercourses are created, particularly with reference to the Great Yarmouth waterfront regeneration area. It is considered that the criterion can be adequately demonstrated through supporting layout plans and accompanying design and access statements.
- As an 'expected' criterion it is considered that the design code provides the necessary flexibility to take account of other site-specific considerations, including other statutory requirements (such as those published by ROSPA) when designing spaces.

Section 4.4: Improve biodiversity on and around the development site (PS4)

Summary of Main Issues Raised

- Lead Local Flood Authority – Considers there to be an opportunity to include SuDS into the text rather than the single mention of green roofs. Other opportunities include Tree pits, rain gardens, attenuation ponds and wetlands all of which would add biodiversity and amenity.
- Norfolk County Council Natural Environment Team - Advises that reference is made to the CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments (ciria.org) and the Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure final edits to make (blog.gov.uk)
- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ criterion would be covered by BNG process and should be removed to avoid duplication. Considered that the ‘expected’ criterion are not necessary as these go beyond adopted policy and would also need to accord with BNG, Open Spaces SPD and have regard to comments from the LLFA. It was also considered that the criteria do not provide any benchmark by which to be assessed. It is suggested that the code is removed.
- Anglian Water – Suggests reference to the emerging Local Nature Recovery Strategy for Norfolk, to assist developers with designs that improve habitat connectivity and habitat creation.
- Hemsby Parish Council - The Parish Council notes that the code seeks the avoidance of living walls, however the Hemsby NHP encourages these.
- Natural England – Supports requirements to maximise opportunities to secure at least 10% BNG on site. It was further considered that there may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:
 - green roof systems and roof gardens.
 - green walls to provide insulation or shading and cooling.
 - new tree planting or altering the management of land (e.g., management of verges to enhance biodiversity).

How issues have been addressed

- Reference to SuDS within first ‘expected’ criterion has been included for greater clarity.
- Reference to CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments (ciria.org) and the Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure final edits to make (blog.gov.uk) has been included in the ‘Useful Resources’ under Section 4.4.
- It is acknowledged that as requirements for biodiversity net gain will be mandatory through national planning policy in 2024, that the ‘required’ criterion is not necessary. The ‘required’ criterion has been removed from this part of the Design Code.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy CS11 to ensure that proposals includes measures which improve biodiversity on and around a development site. It is considered that the criteria can be adequately demonstrated through supporting layout plans and accompanying planning, and design and access statements.
- Role of Local Nature Recovery Strategies are acknowledged, but, as currently in draft, not considered appropriate to reference in Design Code. Consideration may be given to including reference in any further subsequent updates of the SPD.
- Use of ‘Green Walls’ are included in the Hemsby Neighbourhood Plan, not ‘living walls’ which are quite different. There is not considered to be any conflict with the Great Yarmouth Design Code.

- It is considered that opportunities to potentially retrofit green infrastructure in urban environments is already sufficient addressed through codes PS4 and PS5.

Section 4.4: Include Street trees along movement routes and as part of public spaces (PS5)

Summary of Main Issues Raised

- Sport England – Suggests specific text that states that trees should be positioned carefully so that proposed and existing active travel routes and infrastructure are not blocked.
- Broadland Housing Association (via Bidwells) – Considers that as the criteria should not be ‘expected’ as they go beyond adopted policy. It was further remarked that it is unclear how the ‘expected’ criterion will be benchmarked or assessed and is also dependent upon the adoption requirements of Norfolk County Council which will have significant influence on the ability to satisfy the criterion, which are outside of the control of the Council. It is suggested that the code be removed, or amended to ensure it does not conflict with the highway technical requirements of Norfolk County Council, and also provide further information on how proposals will be required to achieve the criterion in practice.
- Persimmon Homes – Considers that the example trees listed under the code, whilst salt tolerant, are also high-water demand trees. This has implications for their placement and potential damage to building foundations and roads. It is not considered sensible to include and should be left to ecologists to deem what is appropriate on a site-by-site basis. It was also suggested that the term ‘closer to the sea’ is ambiguous and believe more context should be given here.
- Anglian Water – In principle agrees however should ensure that location of street trees take account of minimising impacts on underground utilities. It is advised reference is provided to ‘Trees in Hard Landscapes: A Guide for Delivery’ to ensure the location and placement of street trees avoids root damage and resists root ingress into the sewer system.
- Natural England – Supports provision of street trees along movement routes and helps create opportunities for wildlife in urban areas.

How issues have been addressed

- The third ‘expected’ criterion has been updated for clarity that the position of street trees should be located so as not to block active travel routes and infrastructure.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy A2 and the expectations of NPPF para 131 to include provision of street trees within new developments. Norfolk County Council have been engaged throughout the preparation of the design code and are broadly supportive of the principles of the code requirement. It is considered that the criterion provides clear standards by which to achieve.
- Whilst Persimmons’ concern is acknowledged, the ‘expected’ criterion does not provide a closed list of suitable trees but provides examples which are specifically resilient within the seaside context of the borough. It would be expected that any landscaping/planting strategy would be suitably informed by the surrounding context of the area and the Council will take a balanced view, considering other site-specific considerations, as to the appropriateness of specified trees within a development. Notwithstanding, for greater clarity the expected criterion has been amended to refer to sites within 1km of the sea as being expected to plant salt tolerant tree species.
- Reference to ‘Trees in Hard Landscapes’ has been included within the ‘Useful Section’ of the Design Code. Section 4.3 ‘Street, movement and parking’ has also been amended to ensure that new streets are planned in accordance with the street hierarchy code which includes provision of street trees.

Section 4.5: Create a scale, form and pattern of development that is structured and integrates with the scale of its context (BF1)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the ‘required’ aspects of the code are already covered by adopted policy and should be removed to avoid duplicated. Considers that remaining ‘expected’ criterion go beyond adopted policy and largely repeat criterion listed under CI1, therefore provides little additional benefit. Also considered that the criterion is unqualified and don’t provide a benchmark by which to be assessed. It is suggested that the code be removed, or further information required to demonstrate how proposals will achieve the code in practice.
- Persimmon Homes – Expects that the Area Specific Design Code would be applied as a condition under an outline permission, or that there would be flexibility that is proportionate to the scale and stage of the development.

How issues have been addressed

- It is disagreed that the ‘required’ criterion unnecessarily duplicates adopted policy or standards but provides clarity for the users of the design code on local policy requirements. It is disagreed that the ‘expected’ criterions go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of policies CS1, CS9 and A2 to ensure proposed built forms are of a scale and pattern that integrates with its context. It is considered that the criterions can be adequately demonstrated through supporting layout plans and accompanying planning, and design and access statements.
- The 'expected' criterion is not requiring area specific design codes but highlighting that area specific code requirements (within the Design Code) should be applied when considering building frontages and boundary treatments enclosing the public realm.

Section 4.5: Ensure an appropriate sense of enclosure of streets and public spaces, and clear relationships between public and private space (BF2)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Whilst supportive of the principles as good practice, considers that the criterions should not be ‘expected’ as they go beyond adopted policy. Also considered that the criterion is unqualified and don’t provide a benchmark by which to be assessed against. It is suggested that the code be removed, or further information required to demonstrate how proposals will achieve the code in practice.
- Persimmon Homes – Citing “In lower density locations, the scale of street trees should be at least as tall as buildings when mature”, considers that there should be flexibility that responds to the site circumstances in this case. Otherwise, assurances are sought that there was a framework available that detailed the appropriate species for trees in these types of locations.
- Persimmon Homes – Considers that the recommended ratios of building heights to widths (as provided in Fig 3.2) creates potential conflict with density requirements in adopted policy. Considers that lifting examples from the NMDC without reference to the borough is unjustified and could have significant impact on viability.

How issues have been addressed

- It is disagreed that the ‘expected’ criterions go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of policies CS9, A1 and A2 to ensure proposals provide an appropriate sense of enclosure of streets and public spaces. It is considered that the criterions can be adequately demonstrated through supporting layout plans and accompanying planning, and design and access statements.

- The expected criterion, whilst providing general guiding principles regarding the scale of trees to help enclose spaces, is necessarily flexible (like all 'expected' criteria) to reflect site specific circumstances on a case-by-case basis.
- There is not considered to be a conflict between the recommended ratios of building heights to widths and the density requirements in the adopted Local Plan. The Local Plan sets indicative minimum densities, not maximums. The expected approach to building heights and width ratios would allow for potential increases in density by allowing taller buildings.
- It is acknowledged that the recommended ratios of building heights to widths (as provided in Fig 32) requires further clarity. This has been updated in (now) Fig 34.

Section 4.5: Make efficient and effective use of land through designing to appropriate residential densities and plot ratios (BF3)

Summary of Main Issues Raised

- Badger Building – Questions whether suggested plot ratios have been tested against density aspirations in the adopted local plan as this could run contrary to delivering full housing needs.
- Broadland Housing Association (via Bidwells) – Considers that the code requirements should be removed as this duplicate and goes beyond adopted policy, and that it is not clear what the policy justification or benchmark criterion should be for the various density of development measurements. It is suggested that the code requirements be removed or amended to provide further information on how proposals will be required to achieve the density measurements.
- Persimmon Homes – Considers there to be potential conflict with achieving minimum densities whilst also achieving minimum back-to-back distances and road/street widths on development sites. Clarity is needed on what the main priority should be within new developments in the Borough. It was also queried the relevance of providing the different density measurements listed in the code, in planning applications.
- Hemsby Parish Council – The Parish Council wished for densities to be in line with the Hemsby Neighbourhood Plan Design Code, not the increased amount shown for Hemsby of minimum of 30 per hectare.

How issues have been addressed

- The residential densities are all drawn from the existing Local Plan. The non-residential and mixed-use plots are broad brush but considered to be achievable. As an 'expected' criterion, there is flexibility within the criterion to allow for site specific circumstances to be taken into account were demonstrated by the applicant.
- It is disagreed that the 'required' criterion unnecessarily duplicates adopted policy or standards but provides clarity for the users of the design code on local policy requirements. It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy H3. Regarding density calculations, dwellings per hectare is a blunt way to measure density and can lead to perverse outcomes. Providing different metrics will allow case officers to understand densities in a more holistic way and is not considered to be onerous on applicants to provide (beyond dwellings per hectare measurements).
- The back-to-back distances are fairly standard, however reflecting on local circumstances, the minimum back-to-back distances has been reduced from 25m to 20m and this is considered to better reflect the density ambitions of the borough. Regarding density calculations, dwellings per hectare is a blunt way to measure density and can lead to perverse outcomes. Providing different metrics will allow case officers to understand densities in a more holistic way and is not considered to be onerous on applicants to provide (beyond dwellings per hectare measurements).

- It is considered that BF3 minimum density requirements are consistent with the adopted Great Yarmouth Local Plan. Whilst the Hemsby Neighbourhood Plan Design Code references densities lower than those in the Local Plan, it should be recognised that the Neighbourhood Plan Design Code does not form part of the adopted Neighbourhood Plan. It is a material consideration only.

Section 4.5: Ensure building form and layout are optimized with regard to solar orientation, overshadowing and wind (BF4)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Considers that the BF4 criteria should not be “expected” as they go beyond adopted policy. It was suggested that it is also unclear how the requirements can be linked back to Policy A1 (Amenity) of the Local Plan. It was also considered that the criterion is unqualified and doesn’t provide a benchmark to assess against. It is recommended that the code be removed, or further justification provided to understand the relevant link back to Policy A1.

How issues have been addressed

- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A1 and A2. Ensuring developments are designed to optimize daylight, do not overshadow public open space, and help to shelter streets and public spaces to avoid wind tunnel effects are reasonable and justified measures to ensure a high-quality standard, and not least, lead to an unacceptable or excessive impact on the amenity of existing and proposed residents.

Section 4.6: Create active frontages to the public realm (BD1)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the ‘expected’ criterion go beyond adopted policy. It is recommended that the ‘expected’ criterion is relegated to best practice only.
- Hemsby Parish Council – The Parish Council wished to see the alignment of housing/garages to the front of properties, not to the rear as suggested in the Local Plan.

How issues have been addressed

- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policy CS9(c) and A2(c) which seeks to ensure positive relationships between existing and proposed buildings, active frontages, and recognisable streets.
- It is disagreed with Hemsby Parish Council’s comment. BD1 does not preclude garages set to the front of properties but seeks to avoid there this would lead to inactive frontages dominating the public realm or street scene.

Section 4.6: Ensure tenure-blind housing development (BD2)

Summary of Main Issues Raised

- Badger Building – Queried the relationship of figure 36 to BD2 as it appears to relate to building in flood zones.
- Broadland Housing Association (via Bidwells) - Accepts that criteria are deemed as good practice but considers that the entirety of the ‘expected’ criteria go beyond adopted policy. It is recommended that the ‘expected’ criterion is relegated to best practice only.

How issues have been addressed

- Figure 36 (now Figure 38 in final version) relates to BD1 which provides further guidance on maintaining active frontages for development in Flood Risk Zone 3. The layout of the

illustration has been amended to make its interpretation and relationship to BD1 more clearly.

- It is disagreed that the 'expected' criterion goes beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS4(c) to ensure that affordable housing is well integrated into development in terms of design and layout.

Section 4.6: Create functional and accessible new homes with sufficient internal space (BD3)

Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) - Accepts that criteria are deemed as good practice but considers that most of the 'expected' criteria are covered by Building Regulations and should be removed to prevent confusion between the duplication of information. It is recommended that criteria relating to Building Regulations are removed, and that the 'expected' criterion should be amended to 'best practice' only.
- Persimmon Homes – Considers that meeting the M4(2) requirements should reflect the requirements of the adopted Local Plan and Building Regulations. These policies show that flexibility is permitted in certain situations, such as flats that are above ground floor level.

How issues have been addressed

- It is disagreed that the code requirement replicates Building Regulations and should be removed. Building Regulations do not state what proportion of new homes should meet the various standards of accessibility. The code refers to the Buildings Regulations for the full detail. Notwithstanding, as the currently adopted Local Plan does not include a policy requiring National Described Space Standards, this 'expected' criterion has now been amended as a 'best practice' consideration.
- It is acknowledged that the M4(2) criterion within the BD3 is potentially less flexible than the existing adopted policy in that it potentially provides a closed list to circumstances where M4(2) may not be achieved. BD3 has therefore been updated for better consistency with the adopted policy.

Section 4.6: Ensuring adequate daylight and sunlight, and no unacceptable loss of daylight or sunlight to neighbouring existing homes (BD4)

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Design Code needs to be mindful that it is not always viable to just include single aspect homes when balanced alongside daylight/sunlight considerations. Flexibility required in the SPD.
- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the 'expected' criteria go beyond adopted policy. It is recommended that the 'expected' criterion is relegated to best practice only.

How issues have been addressed

- The McCarthy & Stone representation is misinformed as the 'expected' criterion does not seek to include single aspect homes.
- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A2(f) and A1 to provide healthy homes which provide adequate daylight/sunlight and no unacceptable loss of sunlight to neighbouring existing homes. It is considered that the criteria provide clear and justified benchmarks to be considered against.

Section 4.6: Ensure adequate privacy for habitable rooms (living rooms, dining rooms, kitchens, or bedrooms) and private outdoor amenity space (BD5)

Summary of Main Issues Raised.

- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the ‘expected’ criteria go beyond adopted policy. It was further commented that the ‘expected’ criterion has a highly specific nature and therefore may have potential to undermine the ability to meet other criterion including in respect to minimum densities, and particularly with reference to existing brownfield and urban sites where these overly generous back-to-back distances may not be achievable and may adversely affect development viability. It is recommended that the wording of the ‘expected’ criterion is amended for additional flexibility to reflect that it may not always be practicable and feasible to achieve.
- Persimmon Homes – Whilst the aspiration of the criterion is recognised, flexibility is sought to ensure minimum separation distances respond to the site circumstances. It was indicated that no evidence to justify the minimum distances is stipulated and that 20m back-to-back distances between new builds is considered to be more realistic and acceptable.

How issues have been addressed

- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies A1 to promote a high standard of amenity for a suitable living environment. Whilst it is acknowledged that the criterion provides specific standards, it should be recognised that these are guiding principles to be considered and where it can be adequately demonstrated by the applicant of site-specific circumstances that this could not be achieved, this would be considered in the overall balance.
- It is accepted that 20m back-to-back distances between new builds is likely to be more realistic and acceptable in the context of the borough. The first and third ‘expected’ criterion has been updated to reflect this.

Section 4.6: Provide sufficient quality and quantity of private outdoor amenity space for residential development (BD6)

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Considers that open space for older people is much less than mainstream housing. Quality of space accessible for passive recreation is more important than formal open space. It is considered that any minimum sizes set for residential outdoor amenity should exempt older people housing schemes but ensure quality and function of amenity space. It was also suggested that in relation to flats/maisonettes, there are other planning issues that restrict incorporation of balconies on flats such as overlooking and that this should be noted in the requirement.
- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the ‘expected’ criteria go beyond adopted policy. It is recommended that the ‘expected’ criterion is relegated to best practice only.
- Persimmon Homes – Considers that the criterion conflicts with density requirements and it is unrealistic to set minimum requirements for private amenity space as it is not reflective of modern densities in the borough or wider county and is unduly prescriptive and could give rise to serious conflict with national policy and the Council’s own minimum density requirements. It is suggested that requirements for balcony sizes can be offset by access to good quality open space and that the Council should exercise sound judgement which allows for flexibility in this part of the design code given that balconies do not always mesh with the context/character of the surrounding areas.

How issues have been addressed

- Qualitative requirements for older people's housing / specialist housing are acknowledged, however it would be inappropriate to exempt this from a minimum requirement as this goes beyond existing adopted policy. The wording of the 'expected' criterion has been amended to provide greater flexibility in the consideration of private amenity space for older persons housing, specialist accommodation.
- Minimum amenity space sizes are in line with many other Local Plans across the country including high density locations. It is not considered unachievable and having adequate amenity space is a very important part of achieving good quality design. As an 'expected' criterion, there is flexibility within the criterion to allow for site specific circumstances to be taken into account where demonstrated by the applicant.

Section 4.6: Provide convenient and discreet refuse storage and utilities to meet user requirements (BD7)Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Accepts that the 'required' criteria are deemed as good practice, but aside from meeting the requirements of the local waste service, there is no benchmark against which development should be assessed. It is also considered that the 'expected' requirements go beyond adopted policy and that lack appropriate benchmarks to assess compliance. It is recommended that appropriate benchmarks are included in the criteria and that the 'expected' criteria should be relegated to 'best practice' only.
- Persimmon Homes – Considered that the 'expected' criterion under the code should only be applicable to flats as larger new build housing developments will have separate areas for refuse storage separate from the dwellings themselves. It is considered that design matters should be judged on a case-by-case basis to reflect the function and form of structures and their prominence in the street scene.

How issues have been addressed

- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies. These provide recognised qualitative approaches to aid the interpretation of Policies CS9(i), A2(f) and A1 to ensure refuse facilities are designed in a convenient and discreet manner. It is considered that the requirements can be adequately assessed through submitted layout and plans which indicate their placement on a development site. The 'Useful Resources' under this section provides a link to the Council's requirements for local waste collections.
- It is disagreed that this requirement should only be applicable to flats. There are many examples where refuse storage (and combined cycle storage) is integrated within the building design across all types of housing developments. It is recognised that there may be site specific circumstances where this may not be possible, therefore as an 'expected' criterion, it may be flexibly applied where justified by the applicant.

Section 4.6: Screen external plan and equipment from views from the public realm and from the upper floors of listed buildings (BD8)Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the 'expected' criteria go beyond adopted policy. It is recommended that the 'expected' criterion is relegated to best practice only.
- Persimmon Homes – Considers that any restrictions on locations of utility/meter boxes in unobtrusive locations needs to be applied in recognition of restriction on certain types of dwellings e.g., on terraced houses these must be put on primary elevations.

How issues have been addressed

- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies and only regarded as 'best practice'. These provide recognised qualitative approach to aid the interpretation of Policy A1 and is key to ensuring good quality design and protecting the amenity of neighbouring residents/occupiers.
- Whilst the placement of utility boxes on particular dwelling types is acknowledged, it doesn't mean that these cannot be discreetly positioned or screened, as required by the design code.

Section 4.6: Use boundary treatments that contribute positively to the character of the public realm and wider landscape (BD9)Summary of Main Issues Raised

- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the 'expected' criteria go beyond adopted policy. It was also considered that an appropriate benchmark relating to boundary treatments needs to be applied. It is recommended that the 'expected' criterion is relegated to best practice only.
- Persimmon Homes – requests flexibility under the Code as existing hedge lines should be taken into account.
- Hemsby Parish Council - The Parish Council noted that boundary treatments seem to state 1m or below boundaries, yet on page 59 it states below 1.2m

How issues have been addressed

- It is disagreed that the 'expected' criteria go beyond the requirements of adopted policies and only regarded as 'best practice'. These provide recognised qualitative approach to aid the interpretation of Policy A2(c) and A2(e). It is considered that the criteria provide clear and justified benchmarks to be considered against.
- With regards to flexibility concerns existing hedge lines, there is nothing in the design code which would prevent this. Therefore, it is considered that the degree of flexibility is already considered.
- With regards to boundary treatments raised by the Parish Council, this is an error in the design code and has been amended to be 1m, consistent throughout.

Section 4.6: Provide external lighting which minimise light pollution while ensuring safety (BD10)Summary of Main Issues Raised

- Broads Authority – Queried whether the design code should really ask if lighting is needed in the first place, rather than going straight to providing lighting.
- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that the 'expected' criteria is relegated to 'best practice' to reflect that this goes beyond adopted policy. It was further suggested that an appropriate benchmark be applied to assess the requirement and that the Council is clear how competing interests (to avoid excessive light pollution/ensure vulnerable user groups feel safe at night) are implemented. It was recommended that the criteria be amended to provide appropriate benchmarks against which they can be assessed and to amend the definition of 'expected' criterion to 'good practice'.
- Persimmon Homes – Considers that some elements under this Design Code are contradictory, as it is difficult to protect dark skies while also potentially providing excessive street lighting.

- Natural England – Considers that the code includes a link to the Institute of Lighting Professionals which has a has useful guidance on mitigating impact through design (ILP Guidance Notes).

How issues have been addressed

- It is agreed that the criterion should be amended to reflect lighting considerations where they are required. This has been updated within the ‘expected’ criterion of the Design Code.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies and only regarded as ‘best practice’. These provide recognised qualitative approach to aid the interpretation of Policy A1 and E6. It is considered that the criteria can be adequately considered and assessed, in most relevant cases, where informed through a lighting assessment.
- It is disagreed that the elements under this section of the Design Code are in conflict. The code says lighting should be proportionate and carefully considered to avoid excessive light pollution. Ensuring safety does not automatically lead to excessive lighting.
- It is agreed that the code should reference the Institute of Lighting Professionals guidance on mitigating impacts through design. This has been included under the ‘Useful Resources’ section of this part of the code.

Section 4.6: Design appropriate deterrents to bird nesting and roosting (BD11)

Summary of Main Issues Raised

- Badger Building – Suggests that the criteria contribute to the national decline in House Martins, and that roofs and eaves overhangs are crucial to the survival of this species in the UK.
- Broads Authority – The code should consider a section on biodiversity enhancements, rather than just doing things which may stop birds from perching, given emerging BNG requirements.
- Broadland Housing Association (via Bidwells) – Accepts that criteria are deemed as good practice but considers that entirety of the ‘expected’ criteria go beyond adopted policy. It is recommended that the ‘expected’ criterion is relegated to best practice only.

How issues have been addressed

- The issues regarding bird’s species have been considered and the wording of the ‘expected’ criterion has been amended to reflect how the design should consider building forms to deter nuisance bird nesting which creating habitat for threatened species.
- It is disagreed that the ‘expected’ criteria go beyond the requirements of adopted policies and only regarded as ‘best practice’. These provide recognised qualitative approach to aid the interpretation of Policy A1.

Section 5.1: Great Yarmouth, within the Town Walls

Summary of Main Issues Raised

- Historic England – Welcomes references to Conservation Area and Conservation Area Appraisals being fully read and referenced, and references to the historic environment and heritage assets. However, it was considered that references to heritage assets could be improved in places with stronger references to area’s very distinctive historic character and to explicitly refer to any important heritage assets to provide clearer context.

How issues have been addressed

- Whilst reference to the reading and referencing the Conservation Area Appraisals were included in the draft Design Code, these are in the process of being prepared and cannot yet be referenced. Section 2.4 of the Design Code has been amended to highlight that their emerging status and that when published/adopted should be considered as part of the

informing process for future planning applications. Reference to reading the Conservation Area Appraisals within each of the relevant 'Area specific design requirement' section of the Design Code has been removed.

- Whilst it is acknowledged that a stronger reference of the area's distinctive character should be referred to, it is considered that this would be more appropriate to include within the emerging Conservation Area Appraisal. There is also a risk that referencing specific heritage assets may potentially signal poor imitation development proposal within the area.

Section 5.1: Great Yarmouth, within the town walls - Design Requirements (Building Heights)

Summary of Main Issues Raised

- Broads Authority – Would welcome reference to the making the most of the waterside setting, for example the North Quay area where it is on the boundary of the river and the Broads.
- Historic England – Generally agrees that building heights should be three-storeys but notes that there are smaller scale buildings, and that the Council should consider whether the code requirements should be amended to encourage two-storey development where appropriate.

How issues have been addressed

- With reference to North Quay, the 'Design Requirements' section within this character area already makes references to the North Quay SPD which include specific design principles regarding new development within the North Quay area.
- With reference to building heights, the design requirement references predominantly 3-5 storeys, which implies flexibility in the heights of new developments. However, for enhanced clarity, reference to two-storey development has been amended to reflect that it is 'generally' not appropriate to the urban character of the area.

Section 5.1: Great Yarmouth, within the town walls - Design Requirements (landscape design and materials)

Summary of Main Issues Raised

- Historic England – Considers that the principle of conserving and enhancing the setting of the Town Wall (Scheduled Ancient Monument) be reflected further within the requirement. It is also suggested that the requirement should be revised to incorporate references to the public realm and quality materials and additional photographs showcasing the locally prevalent materials and building details typical of the character area.

How issues have been addressed

- Reference to the Town Walls has been included within the 'landscape design and materials' section. Fig. 46 (now Fig 47) provides a range of example quality materials and building details within the character area.

Section 5.2: Great Yarmouth Seafront

Summary of Main Issues Raised

- Historic England – Welcomes references to Conservation Area and Conservation Area Appraisals however disappointed that these are not required to be being fully read and referenced. It was also suggested that references to heritage assets could be improved in places with stronger references to area's very distinctive historic character and remarkable collection of seaside architecture, and to explicitly refer to any particular important heritage assets to provide clearer context.

How issues have been addressed

- Whilst reference to the reading and referencing the Conservation Area Appraisals were included in the draft Design Code, these are in the process of being prepared and cannot yet be referenced. Section 2.4 of the Design Code has been amended to highlight that their emerging status and that when published/adopted should be considered as part of the informing process for future planning applications. Reference to reading the Conservation Area Appraisals within each of the relevant 'Area specific design requirement' section of the Design Code has been removed.
- Whilst it is acknowledged that a stronger reference of the area's distinctive character should be referred to, it is considered that this would be more appropriate to include within the emerging Conservation Area Appraisal. There is also a risk that referencing specific heritage assets may potentially signal poor imitation development proposal within the area.

Section 5.2: Great Yarmouth Seafront - Design Requirements (Building Heights)Summary of Main Issues Raised

- Historic England - With reference to Marine Parade/South Beach Parade (east-side) queried whether having no height limitations for buildings is suitable, recommending that parameter be set while retaining enough flexibility to accommodate taller designs if necessary.

How issues have been addressed

- Whilst this is acknowledged, such an approach is potentially problematic in that it could inadvertently lead to an increase in many big blocky buildings, as any height suggestion would likely need to be set quite high. Notwithstanding, the wording in this section has been amended to reflect that whilst height parameters are not appropriate, building heights and massing should be carefully determined through site-specific analysis to limit impacts on views and the setting of heritage assets.

Section 5.2: Great Yarmouth Seafront - Design Requirements (Car Parking)Summary of Main Issues Raised

- Historic England – Fully supportive of the aspiration to limit traffic and parking.

How issues have been addressed

- Support welcomed. No further changes have been made.

Section 5.2: Great Yarmouth Seafront- Design Requirements (Street elevation & design)Summary of Main Issues Raised

- Historic England – Welcomes reference to ornamental and decorative detailing but consider that this requirement is desirable rather than optional. The code should be amended to reflect this. Also considers that there might be a potential conflict between this requirement and the consideration of maintenance challenges posed by materials exposed to the marine environment.

How issues have been addressed

- It is agreed with Historic England that this should be desirable. The wording of this requirement has been updated to reflect.

Section 5.2: Great Yarmouth Seafront - Design Requirements (Building design and materials)Summary of Main Issues Raised

- Historic England - With reference to Marine Parade/South Beach Parade (east-side) it was noted that requirement for materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance. However, concern that this

may conflict with street elevation requirements, particularly when using materials and detailing that reflects local vernacular. It is considered that the text be amended to encourage consideration of the maintenance implications associated with these materials.

How issues have been addressed

- Whilst acknowledged, there is not considered to be conflict in the design code as this will be determined on case-by-case basis.

Section 5.2: Great Yarmouth Seafront - Design Requirements (Landscape design and materials)

Summary of Main Issues Raised

- Historic England – Welcomes the design requirement, however, suggests modification to encompass improvements to the public realm and high-quality materials.

How issues have been addressed

- This has not been considered necessary as the landscape design requirement does include reference to the public realm and need to improve the quality of the character area.

Section 5.3: Gorleston town centre and historic core

Summary of Main Issues Raised

- Historic England – Welcomes references to Conservation Area and Conservation Area Appraisals being fully read and referenced.

How issues have been addressed

- Whilst reference to the reading and referencing the Conservation Area Appraisals were included in the draft Design Code, these are in the process of being prepared and cannot yet be referenced. Section 2.4 of the Design Code has been amended to highlight that their emerging status and that when published/adopted should be considered as part of the informing process for future planning applications. Reference to reading the Conservation Area Appraisals within each of the relevant 'Area specific design requirement' section of the Design Code has been removed.

Section 5.3: Gorleston town centre and historic core - Design Requirements (Building design and materials)

Summary of Main Issues Raised

- K. Newnham – Queries the non-use of uPVC windows, doors, fascias and cladding.

How issues have been addressed

- It is acknowledged that the non-use of uPVC when replacing windows, doors etc may have cost implications, and their use may be an appropriate material in specific circumstances. The criterion has been amended to remove reference to uPVC windows, doors, fascias and cladding as not being general acceptable.

Section 5.4: Gorleston Seafront

Summary of Main Issues Raised

- Historic England – Welcomes reference to the Gorleston Conservation Area, but that it is not clear whether the Conservation Area Appraisal exists and whether development proposals are required to be read or referenced by these.
- Badger Building – Identifies the photographs presented under Fig 55 as showing recent infill and with no real regard for quality.

How issues have been addressed

- Whilst reference to the reading and referencing the Conservation Area Appraisals were included in the draft Design Code, these are in the process of being prepared and cannot yet be referenced. Section 2.4 of the Design Code has been amended to highlight that their emerging status and that when published/adopted should be considered as part of the informing process for future planning applications. Reference to reading the Conservation Area Appraisals within each of the relevant 'Area specific design requirement' section of the Design Code has been removed.
- Figure 55 (now Figure 57 in the final version) illustrate the general uniform scale and development pattern with individual variety of dwelling design which is considered to bring character and liveliness to the street scene. Whilst it is recognised that some recent infill within the area is potentially less well-designed than others, the specific design requirements listed within this section seeks to provide greater clarity on future design expectations here.

Section 5.5: Great Yarmouth and Gorleston port and industrial areasSummary of Main Issues Raised

- Historic England – Welcomes references to the historic environment and heritage assets. However, it was considered that references to heritage assets could be improved in places with stronger references to area's very distinctive historic character and to explicitly refer to any particular important heritage assets to provide clearer context.
- National Grid Property Holdings (via First Plan) – As owner of the gasholder, welcomes the mixed development of various scale within the area. Notes that the gasholder is unique in its scale and appearance with long views available across Great Yarmouth and therefore a significant consideration in the design of future development proposals. The representation supports that Design Code in encouraging high-density development, and where appropriate, high rise residential dwellings amongst the uses suitable for this part of Great Yarmouth.

How issues have been addressed

- Whilst it is acknowledged that a stronger reference of the area's distinctive character should be referred to, it is considered that this would be more appropriate to include within the emerging Conservation Area Appraisal. There is also a risk that referencing specific heritage assets may potentially signal poor imitation development proposal within the area.
- National Grid Property Holdings comments are welcomed. The area characteristic summary of this section has been amended to include reference to the Victorian Gas Holder.

Section 5.5: Great Yarmouth and Gorleston port and industrial areas - Design Requirements (Building design & materials)Summary of Main Issues Raised

- Historic England – Welcomes the section's character analysis of earlier industrial buildings, highlighting that new development often does not take design cues from the attractive older industrial buildings that could help form a strong reference point for the scale and articulation of new buildings. However, Historic England further commented that the section's character analysis did not appear to have influenced the corresponding 'building design and material requirements' for the character area.

How issues have been addressed

- It is disagreed with Historic England. The 'building design and material requirements' in this section of the code are considered to have been influenced by the industrial character in terms of scale, form and relationship to the street etc.

Section 5.7: Area Types - Terraced streets and squares

Summary of Main Issues Raised

- Historic England – Agrees that later development has not consistently reinforced the existing character of the area, however it is considered that the text should be strengthened by making it explicit that new developments will be expected to actively address this issue by reinforcing and strengthening the existing (historic) character, where appropriate. Also commented that the caption related to Fig 65 which suggests that finding suitable new uses for historic terraces can be challenging – is disagreed with and unhelpful.

How issues have been addressed

- It is agreed with Historic England that the new developments should be expected to actively address the issue by reinforcing and strengthening the existing (historic) character. This has been included within the 'Development Pattern' design requirement in this section of the Design Code.
- It is disagreed that the caption in relation to Fig.65 (now Fig.67 in final version) should be deleted, as this is a recognised problem within these specific character areas.

Section 5.10: Character Areas - Historic Village Centres

Summary of Main Issues Raised

- K. Newnham – Raises sustainability issues regarding recently developed and future planned developments within the borough's villages.

How issues have been addressed

- These general comments relate to the Local Plan process rather than the Design Code specifically. No changes have been made to the Design Code.

Section 6.1: New Housing Developments

Summary of Main Issues Raised

- K. Newnham – Cites material colour use on photographs provided under Fig. 73
- Badger Building – Cites appropriateness of photographs provided under Fig.74 as these are from high-end development and queries their realism in the context of the borough.

How issues have been addressed

- The photos provided under Fig. 73 (now Fig. 75 in final version) are intended to illustrate common issues in new estate design rather than provide examples of appropriate material treatment. All materials and details will be expected to reflect the local vernacular unless a clear design-led rationale is presented for an alternative approach. Section 2.3 of the Design Code provides a useful indication of the historic building materials commonly used within the borough, whilst Section 5 provides more detailed descriptions of materials used in existing character areas.
- The Design Code includes examples of housing development across Norfolk and more broadly across Suffolk and Essex. Regarding 'high-end' developments, the examples include social housing and development that have included a lot of affordable housing. It is disagreed that good design costs money, and it is important to include images that are recognised in the development industry and broadly high-quality schemes so that the bar is set high.

Section 6.1: New Housing Developments - Relationship to Landscape

Summary of Main Issues Raised

- Broads Authority – Raises typographical errors relating to first bullet point.

- Persimmon Homes – Raised typographical errors relating to first bullet point and also questions whether it appropriate or desirable in urban design terms to promote rear boundaries as an appropriate mechanism to face on to the footpaths and cycleways from a visual interest and natural surveillance perspective.

How issues have been addressed

- Typographical corrections have been incorporated across the entire design code.
- The wording of this section has been amended to clarify that in a rural settings it is preferable for rear gardens to form the boundary to the rural landscape, and that the use of close boarded fencing onto the landscape should be avoided, instead natural boundary treatments should be used.

Section 6.1: New Housing Developments – Integration with ‘host’ community

Summary of Main Issues Raised

- Persimmon Homes - There is a focus on seamless integration with existing communities in terms of networks of streets and routes to local destinations. Whilst this is acknowledged, attention is drawn to the requirements of SM2 and how that could run contrary to this aspiration in terms of form and character.

How issues have been addressed

- It is disagreed with Persimmon Homes. An integrated movement network is key to the design code principles. This doesn't mean that development needs to be detrimental to character.

Section 6.1: New Housing Developments – Pattern of development

Summary of Main Issues Raised

- Persimmon Homes - Reference is made to drawing on the built character of existing development in this Section, however this is considered to run contrary to a number of the requirements of the Code in relation to the form, layout and typologies set out earlier in the document and need to reconciled with settlement specific circumstances and aspirations for the built form in that area, if truly successful integration is to be achieved.

How issues have been addressed

- It is disagreed with Persimmon Homes. There are a number of ways to draw upon and be influenced by local character while also meeting contemporary needs in terms of matters such as parking, SuDS etc.

Section 6.3: New industrial, commercial and retail development

Summary of Main Issues Raised

- Broads Authority – Questions appropriateness of just referring to retail and commercial units in out-of-town locations and whether this should simply refer to all types of industrial, commercial, and retail uses. It was also queried whether the design code should really ask if lighting is needed in the first place, rather than going straight to providing lighting.

How issues have been addressed

- It is agreed that the section should focus on all new industrial, commercial, and retail developments, however it should be recognised that the design and layout of such development outside of town locations often present particular challenges. This section of the design code has been amended to reflect the comment.
- In terms of lighting, the need for external lighting would be a matter dealt with through existing local plan policies. Notwithstanding, this section of the design code has been updated to clarify that where external lighting is needed, that this should be carefully designed.

Section 6.4: Development in the rural area

Summary of Main Issues Raised

- Badger Building – Cites the comparability of photographs presented under Fig.76 and their quality.

How issues have been addressed

- This is acknowledged and additional comparable photographs have been included in the final version.

Section 6.5: Holiday Parks

Summary of Main Issues Raised

- Bourne Leisure (via Lichfields) – Considers further clarity within the section as to what borough-wide requirements are most applicable to holiday parks as they will not all apply. Whilst it is generally agreed that boundary treatments, screening, external lighting are the key design considerations, it was considered that reference to mitigation of recreational disturbance appears to go beyond purely design matters. It was requested that the first bullet point under ‘Landscape Setting’ is amended as “Minimise recreational disturbance to natural wildlife/landscape locations through the design of enhancements to suitable alternative natural greenspace for recreation and/or to the movement network/connection to these spaces” as this would provide better consistency with adopted policies CS8, CS15 and GSP5.
- Bourne Leisure (via Lichfields) – It is considered that the examples provide under Fig.77 demonstrates that appropriate boundary treatments will differ on a case-by-case basis and that not one singular approach is advocated. However, it is considered that in some circumstances ‘close boarded fencing’ may be the most appropriate boundary treatment, for example where Holiday Park boundaries abut the gardens of neighbouring properties.

How issues have been addressed

- It is acknowledged that some part of the borough-wide design code requirements may not be a relevant consideration for the design of Holiday Park. Section 6.5 has been amended to make this clearer.
- The first bullet point under ‘landscape setting’ as has been amended to reflect suggestion and consistency with Policies CS8, CS15 and GSP5.
- The second bullet point under ‘landscape setting’ has been amended to reflect instances where close board fencing is least likely to be appropriate.

General Comments

Summary of Main Issues Raised

- East Suffolk Council, Active Norfolk, Norfolk County Council Public Health, Marine Management Organisation, National Highways, N. Harris – Generally supportive of the Design Code throughout or offered no comment.
- J. Buchanan – Considers the new buildings should incorporate swift bricks and hedgehog highways.
- M. Castle – Considers design code should pay special attention to the need for a Controlled Parking Zone in the Town centre. Without this approach, considers that there will be difficulty in getting support of local Town Centre residents and businesses for significant new development.
- M. Clarke – Considers that whilst the document is very detailed, questions how practical it is to use examples from around the country as to where GY wants to be, and what has been done to ensure that these examples have made that environment better for those communities.

- Water Management Alliance – Generally supportive on emphasis on reducing water, rainwater harvesting, greywater recycling, reference to meeting LLFA runoff rate and SUDS to CIRIA SuDS manual. Supports encouragement of maximising infiltration, use of above ground multifunctional SuDS integrated into design, creating/retaining watercourse, avoiding fencing around watercourses. All are welcome steps towards more sustainable water management.
- Norfolk County Council Children Services – Considers that the Design Code should include design requirements for new schools, based upon the design guidelines set out in the DFE Building Bulletin Guideline.
- Sport England – considers that the draft design code should be assessed against the ‘Active Design Checklist’ to ensure that it fully reflects the expectations and considerations for Active Travel. It was also suggested that the Active Design Guidance is included within the ‘Useful Resources’ section in the relevant areas of the Design Code.
- Hemsby Parish Council – Were disappointed that having spent time to adopt their own Neighbourhood Plan and Design Code to adoption stage in June 2023, only to consider that a number of them were undermined by GYBC Design Code. They considered that this seeks to dilute the vision of Hemsby’s residents that was formulated using their responses and desires for future planning in Hemsby.
- K. Newnham – Considers that with regards to building styles, a number of the examples are poor and would appear that developers should look to the Netherlands and maintain a more traditional style.

How issues have been addressed

- Regarding swift bricks etc – Design Code requirement PS4 ‘improve biodiversity on and around the development site’ include a number of ‘expected’ design criterion which seeks to encourage habitat creation in the design of buildings and spaces. This includes potential integral bird boxes and allowing the movement of small mammals including hedgehogs.
- Regarding Controlled Parking Zone, the Design Code cannot introduce new policies, only provide additional interpretation and guidance on existing adopted policies or parking standards.
- The Design Code includes examples of housing development across Norfolk and more broadly across Suffolk and Essex. Many of the examples include social housing and development that have included a lot of affordable housing. It is important to include images that are recognised in the development industry and broadly high-quality schemes to that the bar is set high.
- Whilst it is acknowledged that the design and layout of schools are very important, it has been considered not necessary to include this within the code as future designs are set out under existing guidance and managed through the Local Education Authority
- Reference to the Active Design Guidance is already included within the ‘Useful Resources’ section of 4.3 ‘Streets, movement and parking’. The Design Code has been updated by including reference to the Active Design Guidance under the ‘Useful Resource’ section in 4.4 ‘Public open space, nature and water’.
- It is disagreed with Hemsby Parish Council. It is considered that the two design codes are quite similar in many respects, as demonstrated with respect to earlier comments addressed within this consultation statement.

General Comments – Principle of Design Codes

Summary of Main Issues Raised

- McCarthy & Stone (via Planning Bureau) – Raises general concerns that design code requirements may introduce unnecessary financial burden and introduce new planning policies, contrary to National Planning Practice Guidance.

- Badger Building – Considers that the Design Code draws heavily on the National Model Design Code without analysis to justify the outcomes.
- Broadland Housing Association (via Bidwells) – Generally considers that a number of the draft codes unnecessarily duplicate the requirements of adopted policies, building regulations and matters covered by Statutory Consultees and largely fails to provide further guidance on how the adopted policies will be delivered. Suggests that the volume of codes within the document be reduced.
- Persimmon Homes – Consider that the Design Codes may be treated as prescriptive and inflexible and seek assurances that the Council will allow flexibility and exercise a certain amount of judgement over proposals wherein the applicant can demonstrate that the site requires departures and where this can be facilities where justification is provided. Also raised concerns that the aspirations of the Council may not meet the requirements of the NCC Highway Authority and seek certainty that the Highway Authority will adhere to any adopted guidance such as the Design Code.

How issues have been addressed

- The Design Code includes standards which are based upon an adopted policy requirement and therefore already tested through the Local Plan process, and those which are subject to discretion and may need to be balanced against other aspects of design. Therefore, it is not considered that the Design Code introduces new planning policies or unnecessarily add to the financial burden on developments.
- The introductory section of the Design Code has been updated to reflect how the design code meet the National Model Design Code requirements and expectations.
- As demonstrated in response to many of the earlier comments made by Broadland Housing Association (via Bidwells) and Persimmon Homes, the code provides additional detail on how to comply with the policies set out in the Local Plan, using recognised qualitative design-based approaches. Where considered necessary, the design code has been updated to include additional detail to help benchmark the 'required' and 'expected' based criteria. The Council considers that the volume of codes within the document is proportionate and justified.
- As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal and in some cases, applicants may demonstrate that it would be unfeasible or unviable to be fully policy compliant in every detail, or that betterment can be achieved via different approach. However, the onus is on applicants to justify their approach in these cases.

Appendix 1 – ‘Final Draft’ Consultation Original Representations

Respondent: Marine Management Organisation

Thank you for your invitation to participate in the consultation for the final Draft Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) Consultation.

No further comment is required from the MMO regarding the modifications, we do however advise that you consider any relevant policies within the [East Marine Plan Documents](#) in regard to areas within the plan that may impact the marine environment, including the tidal extent of any rivers. We recommend the inclusion of the East Marine Plans when discussing any themes with coastal or marine elements.

When reviewing the East Marine Plans to inform decisions that may affect the marine environment, please take a whole-plan approach by considering all marine plan policies together, rather than in isolation.

Respondent: National Highways

Thank you for consulting National Highways on the abovementioned Great Yarmouth Design Code SPD.

National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

It has been noted that once adopted, the SPD, will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within close proximity to the SRN and will assess the impact on the SRN of a planning application accordingly.

Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have a severe impact on the operation of the trunk road and we offer No Comment.

Respondent: J. Buchanan

I'd like to see our borough legislate that in all future developments, new buildings incorporate Swift bricks to help these endangered birds find nest sites.

Also, Hedgehog highways to be used in boundary fence panels/ concrete gravel boards.

Respondent: McCarthy & Stone (via Agent: Planning Bureau)

Thank you for the opportunity to comment on the Great Yarmouth Design Code Draft SPD, June 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK. Please find below our comments on the consultation.

The Council should initially note that paragraph: 008 Reference ID: 61-008-20190315 of PPG on Plan Making states ‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan.....They should not add unnecessarily to the financial burdens on development’.

We are concerned that many of the design code requirements may introduce an unnecessary financial burden on development and therefore be contrary to PPG. The Council should ensure that they consider the draft design code in the context of ensuring that requirements do not add to the financial burden of development.

Policy CC5: Reduce embodied carbon emissions resulting from construction.

Policy CC5 requires development to retain and reuse existing structures where this is the most carbon efficient, where it can be suitably adapted, and the structure contributes to the local area. The policy area also requires an embodied carbon assessment to be submitted alongside applications.

Given the requirements of para 008 Reference ID: 61-008-20190315 of PPG on Plan Making as detailed above, the introduction of an embodied carbon policy must not be so inflexible that it introduces a financial burden and deems sites unviable. Any SPD requirement needs to ensure this to make sure it is consistent with NPPF/PPG.

The Council should note that new development will often be far more sustainable in many circumstances including building fabric and by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site. The Council also need to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration as in our experience this is not yet readily available from the majority of suppliers.

CC2 Minimise active heating and cooling requirements through passive design and BD4: Ensure adequate daylight and sunlight for new homes, and no unacceptable loss of daylight and sunlight to neighbouring existing homes.

Policy CC2 requires proposals to minimise active heating and cooling requirements through passive design. This design feature requires single aspect homes and for south and west facing homes to prevent overheating. Policy BD4 looks to ensure adequate daylight and sunlight. The Council need to be mindful of how overheating is balanced alongside daylight and sunlight and accept that it is not always viable to just include single aspect homes especially when balanced alongside daylight and sunlight, so some flexibility needs to be provided within the SPD.

BD6 Provide sufficient quality and quantity of private outdoor amenity space for residential development.

The Council should note that open space needs of older people are much less than for mainstream housing. For older people the quality of open space either on site or easily accessible for passive recreation is much more important than formal open space. If the Council decide to set a minimum size for residential outdoor amenity open space the SPD should provide an exemption for older people's housing schemes but ensure such proposals, consider the quality and function of the amenity space instead. With respect to flats and maisonettes it should also be noted that there are often other planning issues that restrict the incorporation of a balcony on flats such as overlooking, and this should also be noted with the policy.

Thank you for the opportunity for comment.

Respondent: Water Management Alliance

Thank you for consulting the WMA on the Final Draft Great Yarmouth Borough-Wide Design Code SPD. Great Yarmouth Borough falls partially within parts of the Internal Drainage Districts (IDD) of the Broads (2006) Internal Drainage Board (IDB) and the Waveney, Lower Yare and Lothingland IDB, members of the WMA. Therefore, the Board's Byelaws apply to any development within a Board's area.

The principal function of an IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. Main Rivers within the IDB are regulated by the Environment Agency.

The area outside the Boards' IDD falls within the Boards' watershed catchments (meaning water from this area will eventually enter the IDD). The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.

Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents.

Having reviewed the Final Draft SPD, I am pleased to note an emphasis on reducing water use through rainwater harvesting and greywater recycling. It is also positive to see reference to the requirement for developments to meet the LLFA's requirements with regard to runoff rates, and that SuDS should be designed to the requirements of the CIRIA SuDS manual. The encouragement of maximising infiltration, use of above ground and multifunctional SuDS integrated into design, creating, and retaining access to watercourses including buffer zones for maintenance, and avoiding fencing around water features such as watercourses are all supported by the Boards as steps towards more sustainable water management.

I would note that, as above, the Boards are regulators of ordinary watercourses in their IDD. Per the Board's Byelaws, any alteration to watercourses, works within 9 metres (BIDB) or 7 metres (WLYLIDB) of Board Maintained watercourses, or introduction of water into a watercourse will require the Board's consent within an IDD. This is not to supersede the regulation of the LLFA or the EA, but alongside with a view to providing extra protection to the more vulnerable areas the Boards encompass. I would suggest that the Board's regulation could also be referenced within CC7 in particular. I'd be happy to discuss with you further how this could be included.

Respondent: Badger Building

In December 1973 Essex County Council unwittingly published the first 20th century Design Code for residential development, as it sought to encourage developers to move away from the more rigid street patterns which had come to dominate housing development in the post war boom period of the 1950's and 60's. Intended as a guide for that County and aiming to increase an emphasis on vernacular design and materials, along with a more informal approach to housing layouts, it rapidly became the go to guide for both planning authorities and developers. The housing layouts of the 21st century remain wedded to the principles set out in that document and its influence can be seen throughout the country, and therein lies the problem with design guidance or design coding.

The Great Yarmouth Design Code draws heavily on the principles of the recently published National Design Code, whilst omitting the analysis suggested to provide the justification for the outcome. The problem is of course that if the National Design Code is to be followed then the analysis isn't really supporting the outcome as the outcome is largely determined already.

A brief look at the Design Code produced by Aecom for the Carlton Colville Neighbourhood Plan will show the same proposed street sections and frontage layouts and similar plot ratios. Without providing further evidence I think it is fair to say that many other Design Codes will produce the same outcomes. It seems that the wheel moves full circle from the plethora of Essex Design Guide copies produced throughout the land, with the resulting impact on layouts; to a new normal, sketched out (quite well it is fair to say) by central government and repackaged by consultants as something unique for each Council's own use.

So, we move away from informality and replace it with formality, based for the most part on grid squares, with long rows of frontage development and using a road pattern with significant amounts of street tree planting, which up till now had been deemed unacceptable by the highway authority.

The first question to ask is – Has the highway Authority signed up wholeheartedly to the Design Code as published, and will it be providing a suitably modified technical document of its own covering the necessary highway design amendments necessary to deliver the new design agenda. See especially pages 33-37. Without this, this new approach to the design of the built environment where it interfaces with the technical aspects of highway construction, will be doomed. There must be 100% buy in to the Design Code from the Highway Authority.

Question two is – Have the plot ratios suggested been tested against density aspirations in the local plan, to see if the two match up? There is no point in having plot ratios and minimum plot widths if the resulting layouts will not deliver, with an appropriate mix of housing for a site, the numbers allocated in the local plan.

Question three – Just what is wrong with developers’ standard house types. The Code pours cold water on these. How impractical. Two responses arise here – firstly, for the most part developers house types can be elevated to suit a variety of locations and layouts. Secondly, it quite simply would not be practical to have even on an estate of say 25 houses, 25 different house types all with different components. The logistics of materials ordering, and construction supervision render even that scenario impossible. Now scale that up to a site of a 100 or perhaps 350 or more and it is easy to see the shortcomings of this approach. Developers rely on the bulk ordering of components of all sizes to deliver affordability across their product range. Trying to convert the mass building of homes into the mass building of custom-built homes quite simply will not work.

Question four – Why are so many examples shown in photographs taken either at high end housing locations in the southeast, Cambridge and even Holland? Was it that the authors were insufficiently familiar with good design examples locally to support their text? Or just lazy and reverted to their photo archives. These examples do not sit well in the local housing market, where land values will not support the aspirational materials, they are often intended to show case.!

It is perhaps worth noting that when considering materials that quality often has a higher price. Badger recently considered replacing the plastic windows in one of its mid-market properties, with aluminium ones, the exercise showed a £6000 per dwelling increase in price, even allowing for bulk purchase. Taken across a 100-house scheme that could easily add nearly a million pounds to build costs, reducing land values by a similar amount. That doesn’t do a lot for viability, regardless of the aesthetic desirability.

I include photographs at the foot of the text from the edge of Norwich, of a development more typically espoused by the Design Code which exhibits both good design and a range of good quality materials. Use of such local images, (and I could have found more in just a day around Norwich and its surrounding villages) could have amply illustrated the intentions of the design guidance, without the claim easily arising that those examples quoted are aspirational, elitist, or even worse foreign!

Considering the details of some of the policies I make the following comments:-

Policy CL 3 seeks a statement of the clear design approach for each scheme. Given the very obvious constraints and aspirations of the code, how much latitude will there be for deviation from what might otherwise be seen as a fairly prescriptive document, given that the policy seeks “a distinctive and place specific identity”?

Policy SM4 seems to assume 100% bike ownership amongst the population. This is unrealistic. As of August 2022, Government figures tell us that cycle ownership is presently at 45% for those over 5 with usage levels being around 10% of the population. Even at 75% of bed spaces this policy would

be excessive. I understand the need to shift transport on to low carbon solutions and the bicycle is recognised being ideal for journeys of 6 miles or less. But cycling for transport is not going to be the mode for 100% of the population as an answer to the climate crisis.

What is the relationship of figure 36 to policy BD2. It seems to relate to building in flood zones.

Policy BD 11 is contributing to a national decline in house martins. Roof and eaves overhangs are crucial to the survival of this species in the UK.

The choice of photographs on page 80 shows recent infill, with no real regard for quality. There must be better examples.

The photographs on page 111 are all from high end developments – see my earlier comments re the suitability of chosen images.

The photographs on page 115 are not really comparing like with like. – the second picture is of questionable quality. It is difficult to see beyond the cabbages in the foreground.

Respondent: Historic England

Thank you for consulting Historic England on the final draft Great Yarmouth Borough-wide Design Code Supplementary Planning Document (SPD). As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on the consultation document at this stage.

General Comments

Overall, we welcome the preparation of the Design Code SPD which is clear and succinct. We consider that the proposals will encourage better development that will enhance the ability for people to appreciate Great Yarmouth's unique heritage and improve and enhance the setting of historic buildings and monuments within the Borough. We have however identified some areas where the SPD could be improved, and these are discussed below.

2.3 Local building materials

While we welcome this section on local building materials, we consider that it could be enhanced by including photographs showcasing the material palette, along with illustrated examples of buildings that utilise these materials.

2.4 Heritage designations and assets

This section could be improved by making it more Great Yarmouth-specific. Providing details about the number of listed buildings (LBs), scheduled monuments (SMs), conservation areas (CAs), and heritage at risk (HAR) within the Borough area would add local context. Additionally, it would be helpful to mention here that heritage assets can be harmed (and enhanced) by development within their settings.

4.2 Context and identity

We welcome the references to the historic environment and heritage assets within this section, as well as the numerous requirements with regards context and identity; CI2 (Conserve and enhance the significance of heritage assets); and CI3 (Create a positive and distinctive sense of place for new development).

With regards CI4 (Use external materials and detailing which complement the local context and are appropriate for the local climate), while we welcome the requirement that new development should use materials and details which reflect the local vernacular, there might be a potential conflict with

the requirement that the materials and details used must be robust and suitable for the local climate. This is especially relevant in area 5.2, Great Yarmouth seafront. While we understand the rationale for this requirement, we suggest the text is amended to encourage consideration of the maintenance implications associated with these materials and details so that new development reflects the local vernacular while also being suitable for the exposed marine environment.

Character Areas

Overall, we welcome the analysis and requirements relating to the six-character areas. However, we request that the Council reviews these to ensure consistency of wording in relation to Conservation Areas, and, in particular, checks whether all Conservation Area Appraisals (CAAs) are properly referenced in the text where they exist. We have identified the following discrepancies:

- 5.1 Great Yarmouth, within the town walls - *'It includes several Conservation Areas, which are well described by the corresponding Conservation Area Appraisals.... These should be fully read and referenced in relation to any development proposals at any scale'.*

We welcome that the reference to the Conservation Areas and that CAAs should be fully read and referenced.

- 5.2 Seafront - *'the Seafront Conservation Area and is well described in the Conservation Area Appraisal, and site-specific policies in the Local Plan also apply to parts.*

We welcome the reference to the Seafront Conservation Area and corresponding CAA but are disappointed that development proposals are not required to read or reference these.

- 5.3 Gorleston town centre and historic core - *'Its corresponding Conservation Area Appraisal and Management Plan should be fully read and referenced in relation to any development proposals within the bounds of both the Conservation Area and its proposed extensions'.*

We welcome that the reference to the Conservation Areas and that CAAs should be fully read and referenced.

- 5.4 Gorleston seafront - *'The majority of the Gorleston seafront is within the Gorleston Conservation Area Extensions.'*

We welcome the reference to the Gorleston Conservation Area, but it is not clear whether a CAA exists, and if it does whether development proposals are required to read or reference these.

As can be seen there is considerable variation regarding how Conservation Area Appraisals are referenced across character areas and how development proposals should address them. We understand that these discrepancies may partially stem from the fact that some of the Conservation Area Appraisals are only available as paper documents in the Council offices and are not available digitally or have yet to be formally adopted/published; for those CAAs it would be helpful if the code summarised and incorporated the key findings of the report. This would clarify the key issues and how developers should address them. Where CAAs have yet to be formally adopted/published this should be made clear in the text.

5.1 Great Yarmouth, within the town walls – General

We welcome the references to the historic environment and heritage assets. However, we suggest that this could be improved in places with stronger references to the area's very distinctive historic character. Specifically, it would be beneficial to explicitly name any particularly important heritage assets (designated or non-designated) to provide clearer context.

5.1 Great Yarmouth, within the town walls – Height and massing

While we agree that building heights are generally three-storeys, particularly if they include roof space and above, it's worth noting that there are some smaller scale buildings, primarily located to the north and south. The Council should consider whether there are any instances where two-storey development could be appropriate since the current text might create challenges in cases where this (two-storey development) could be beneficial and amend the code accordingly.

5.1 Great Yarmouth, within the town walls – Landscape design and materials

While Fig. 45 highlights that the setting of the town wall Scheduled Monument is very poor in many areas, it is disappointing that this is not reflected in the landscape design and materials requirement. The code should be amended to make it clear that any development proposals within the vicinity of the town wall will be expected to conserve and enhance its setting. Additionally, we believe that the requirements should be revised to incorporate references to the public realm and quality materials. Finally, and in common with the other character areas, we recommend including additional photographs showcasing the locally prevalent materials and building details typical of the character area, along with illustrated examples of buildings that utilise these; this will provide greater clarity and clearer context.

5.2 Great Yarmouth Seafront – General

In common with the other character areas, we welcome the references to historic environment and heritage assets. However, we suggest that this could be improved in places with stronger references to the area's very distinctive historic character. Specifically, we recommend highlighting the area's remarkable collection of seaside architecture. Moreover, it would be beneficial to explicitly name any particularly important heritage assets (designated or non-designated) to provide clearer context.

5.2 Great Yarmouth Seafront – Height and massing

Regarding Marine Parade/South Beach Parade (east side), we note that due to the nature of seafront attractions, height parameters are not appropriate but building heights and massing should be carefully determined to limit impact on views and setting of heritage assets. While we understand the rationale for this, we wonder if having no height limitations for buildings is suitable. In light of this, we recommend that parameters be set while retaining enough flexibility to accommodate taller designs if necessary.

5.2 Great Yarmouth Seafront – cycle and car parking

We support the aspiration to limit traffic and parking.

5.2 Great Yarmouth Seafront – street elevation and design

We welcome the reference to ornamental and decorative detailing but consider that this requirement is desirable rather than optional. The code should be amended to reflect this. As mentioned below, there might be a potential conflict between this requirement and the consideration of maintenance challenges posed by materials exposed to the marine environment.

5.2 Great Yarmouth Seafront – Building design and materials.

With regards to Marine Parade/South Beach Parade (east side), we note the requirement that materials and detailing must be suitable for the exposed marine environment without requiring extensive frequent maintenance. As discussed in 4.2 (Context and Identity) while we understand the rationale for this requirement, we are concerned that there might be a potential conflict with the street elevation design requirement, discussed above. This is especially relevant when it comes to using materials and detailing which reflect the local vernacular (CI4).

As described on page 69 of the code, this area features many characterful and elaborate buildings with bold shopfronts; upper floors typically have projecting bays and balconies, often made of

painted stucco or brick, and retaining well-preserved original balconies, windows, and other details. Therefore, we suggest the text is amended to encourage consideration of the maintenance implications associated with these materials and details so that new development reflects the local vernacular while also being suitable for the exposed marine environment. Once again, we recommend including additional photographs showcasing the material palette and detailing typical of the character area, along with illustrated examples of buildings that utilise these; this will provide greater clarity and clearer context.

5.2 Great Yarmouth Seafront – Landscape design and materials

We welcome the design requirement concerning landscape design and materials; however, we suggest a modification to encompass improvements to the public realm and high-quality materials.

5.5 Great Yarmouth and Gorleston port and industrial areas – General

In common with the other character areas, we welcome the references to historic environment and heritage assets. However, we suggest that this could be improved in places with stronger references to the area's very distinctive historic character. Specifically, it would be beneficial to explicitly name any particularly important heritage assets (designated or non-designated) to provide clearer context.

5.5 Great Yarmouth and Gorleston port and industrial areas – Building design and materials.

We welcome the analysis of earlier industrial buildings within the area characteristic section, and text at Fig. 59. (Page 84) which describes new apartment buildings in the character area, highlighting that they do not take design cues from the attractive older industrial buildings which could form a strong reference point for the scale and articulation of substantial new buildings.

Therefore, it's disappointing that these observations haven't influenced the building design and material requirements for the character area. We recommend that the Council consider whether these attractive older buildings should provide a reference for the code and amend the design requirements accordingly. Once again, it might be beneficial to incorporate additional photographs illustrating locally prevalent materials and building details to provide clarity.

5.7 Terraced streets and squares

We agree with the observation that later development has not consistently reinforced the existing character (refer to page 91 and Fig. 65, caption of the middle right photo). However, we believe that the text would be strengthened by making it explicit that new developments will be expected to actively address this issue by reinforcing and strengthening the existing (historic) character, where appropriate.

Finally, we question the Fig. 65 photo caption middle left (page 93). The caption suggests that finding suitable new uses for historic terraces can be challenging. We disagree with this statement and find it unhelpful; we suggest this text is deleted.

Conclusion

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Respondent: Lead Local Flood Authority

On page 21 CC6: Ensure development is flood safe and flood resilient appears to relate to all sources of flood risk and yet only the Environment Agency's guidance for finished floor levels. Please can you

add in the expected section that the applicant will be expected to also check compliance with the LLFA's guidance too.

On Page 21, CC7: Reduce the risk of surface water flooding on and around the site, the applicant is required to "take account" with the LLFA's advice as stated by NPPF paragraph 169. Therefore, please can the design code state in the required section that the LLFA's Developer Guidance must be applied appropriately to all developments for surface water management.

Informative – In relation to CC8: Reduce urban heat island effect, the use of green SuDS has been shown to contribute to support the management of this. In addition, the combined use of solar panels with green roofs is shown to be beneficial to the performance of solar panels.

In the useful resources section on page 23, please remove the reference to the NCC Highway SuDS Adoption Guide and replace with reference to the LLFA's Developer's Guidance document which can be found at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>.

On page 26 CI3, the LLFA note there is no mention of the use of SuDs to support the creation of a positive and distinctive sense of place for new developments in either the required or expected sections. Please can this opportunity to include SuDs in this context be taken as this would support one of the four pillars of SuDs (amenity).

On page 30 SM2, there is an opportunity to expect the use of SuDS to help separate vulnerable users from trafficked areas such as the use of raingardens.

On page 39, the incorporation of green roofs on bike storage should be encouraged such as in Fig. 24 right photo.

On page 43 PS1, there should be a required section that indicates that existing ordinary watercourses must be retained and incorporated into the proposed design.

On page 45 PS4, there is an opportunity to include SuDS between into the text rather than the single mention of green roofs. Other opportunities include Tree pits, rain gardens, attenuation ponds and wetlands all of which would add biodiversity and amenity.

HRA Screening Report

No comments based on a preliminary high-level review.

SEA Screening Report

No comments based on a preliminary high-level review.

Respondent: M. Castle

I should like to see the Design Code pay especial attention to the need for a Controlled Parking Zone in the Town Centre area of Yarmouth between Kitchener Road/Ormond Road to the north and Nottingham Way in the south as this will be a requisite if regeneration of the North Quay, The Conge and Hall Quay areas is to be successful.

The absence of a Zone B controlled parking zone was a major contributing factor in the abandonment of the previously funded (but not delivered) Hall Quay scheme.

The intensification of developments in the areas mentioned above will require a Zone B to the side of the existing Zone A seafront-controlled parking area which has been so successful for local residents and businesses in the years since 2006.

Without this strategic approach there will be difficulty in getting the support of local Town Centre residents and businesses for significant new development – even though this is critical to the future

prosperity of the town. Also of course the revenues derived from parking permits for residents and businesses are absolutely essential in funding Norfolk County Council parking management in the core CPE area.

The town is blessed with several thousand parking spaces GYBC car parks/NCC on street/ Market Gates Multi-storey/ private sector paid car parks and NCC free time-limited on-street spaces - all of which make proper protection for local residents and businesses somewhat easier than elsewhere in the Brough.

It would be a mistake to try to have an All-Borough parking strategy as permit parking would be far less attractive to residents in Gorleston and Caister for example where major regeneration schemes will not be taking place and where there is generally less pressure on parking.

Respondent: National Grid Property Holdings (Via Agent: First Plan)

We are instructed by our client, National Grid Property Holdings (NGPH), to make the following representations to the Great Yarmouth Borough-Wide Design Code Supplementary Planning Document. NGPH is the landowner and promoter of the Former Gasworks and Gasholder site at Admiralty Road, Great Yarmouth, NR30 3DR, herein referred to as 'the site'.

Gasholders are no longer operational, as gas can be stored in pipework underground. This means that many sites, comprising gasholder stations and former gasworks facilities, are no longer in use. Instead, they provide an opportunity for alternative development.

The Gasworks, dating back to the mid-1880s, is located at the intersection with Admiralty Road and Barrack Road, with the full extent of the landholding encompasses circa 1.2ha in total. The eastern portion extends to circa 0.4ha and features the Grade II Listed Gasholder, No.5, within the northern extent and non-listed Gasholder No. 6 to the south. Permission has been secured for the demolition of the non-listed gasholder (ref: 06/22/0102/DM), and planning and listed building consent applications are pending for the partial refurbishment and demolition of the listed gasholder (refs: 06/23/0522/F and 06/23/0523/LB). The western portion of the site includes an expansive area of open storage with a separate access off South Denes Road. The site is vacant and predominantly laid to hardstanding and bare ground with ephemeral / short perennial vegetation. The surrounding area features residential properties to the north and east with commercial and industrial uses to the south and west. The site is located 400m west of Yarmouth beach and 200m east of the River Yare, close to the Third River Crossing.

An initial Call for Sites was undertaken in Summer 2022 and NGPH has made it clear that they would like to be involved in the development of the new Local Plan and the supplementary SPDs consultation going forward as works continue to ready the Former Gasworks site for alternative development.

NGPH is not a developer and therefore the Draft Design Code SPD is arguably of more relevance to future developers and their development proposals for the site. However, it remains relevant to NGPH as they look to dispose of the site. The gasholder is unique in its scale and appearance, with long views available across Great Yarmouth. Assuming the approval of the pending applications, this will soon be restored in line with its original appearance. Beyond this, the site is vacant and cleared. The gasholder is therefore a significant consideration in the design of future development proposals.

We note that the gasholder site is situated within the '*Great Yarmouth and Gorleston Port and Industrial Areas*', known as character area 5.5. The SPD acknowledges there is mixed development types seen throughout the area and welcomes mixed development of various scale within the area.

As has been made clear already, NGPH welcomes as wide a range of uses as possible, to encourage investment into the site, including supporting the proposed removal of the site from the Safeguarded Employment Land designation. NGPH is therefore generally supportive of the content

of the draft Design Code, which acknowledges that the historic uses, buildings, and structures of this area *'could form a strong reference point for the scale and articulation of substantial new buildings'* (Fig. 59)

Noting the significant investment required to partially refurbish the listed gasholder, flexibility around the scale, type, mass, and form of development on the remainder of the site, and indeed within the gasholder footprint (assuming the tank and bell are permitted to be removed), is wholly supported.

For these reasons, NGPH supports that the Design Code encourages high-density development and, where appropriate, high rise residential dwellings amongst the uses suitable for this part of Great Yarmouth. Buildings of 12-20m are supported, possibly taller in waterfront locations. The application site, whilst not in a waterfront location, has the potential to accommodate taller structures too, noting the scale of the existing gasholder, which sits significantly above the height of surrounding buildings. Indeed, it is clear from other retained gasholder sites that significant development can co-exist alongside retained structures, subject to detailed design considerations, viability and, of course, regard to the designated heritage asset, both in terms of retention of the asset and enhancing its setting.

More generally, the draft document encourages appropriately scaled development, using sites as effectively as possible which respond sensitively to the surrounding area and connect isolated areas together through careful massing and scale design. This is wholly supported by NGPH as the application site, which is strategically located in terms of its proximity to the Third River Crossing and is cleared and available for development, presents an ideal opportunity to initiate development in line with these aspirations in this important Character Area.

I trust that this provides clarity on the landowner's aspirations for the site, their views on the content of the draft Design Code, and their continued interest in engaging as the Local Plan progresses. However, if any further information or clarification is required, please do not hesitate to contact me.

Respondent: Norfolk County Council Childrens Services

Norfolk County Council school design is based closely on design guidelines set out in the DFE Building Bulletin Guidelines, and output specifications. These set out the expectation for spaces and technical elements that dictate design and form. This includes requirements for hard and soft play. Parking requirements are set out by Norfolk County Council Highways parking standards.

School sites should form an integral part of any development area, they provide an important part of infrastructure that can support the local community. It is important school sites are accessible from the housing to which they serve, within legal walking limits and they have links to major estate roads.

School site areas should be sufficient to meet relevant building bulletin design standards. Additionally, there should be allowances for bio-diversity net gain, sustainable urban drainage, and the county council's aim to provide nursery and special education needs provision as part of the school design.

Land for school provision should be as flat and regular shaped as possible and should not be in a position where it can be overlooked by multi-storey buildings nor be overshadowed by large tree canopies. Schools will be designed to deliver a high efficiency and will complement their local surroundings.

Respondent: Norfolk County Council Natural Environment Team

PS1: It is advised that reference is made to the RTP/ RSPB best practice guidance *Cracking The Code*; How design codes can contribute to net-zero and nature's recovery: *Plan The World We Need*

(rspb.org.uk) and Site Level Design Code; Design Code for Net Zero and Nature Recovery: site-code_220317_compressed.pdf (rspb.org.uk)

PS4: It is advised that reference is made to the CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments (ciria.org) and the Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure final edits to make (blog.gov.uk)

Respondent: Norfolk County Council Public Health

Public Health are pleased to see the inclusion of health and wellbeing considered throughout the Great Yarmouth Design Code and that it supports the creation of well-designed developments and healthy environments.

Some specific Public Health comments to consider are stated below:

3.1: To include - Support healthy behaviours and reduce health inequalities.

4.1: The health benefits of addressing climate change could be referenced, for example active travel supporting physical activity.

4.4: To include - Local growing options such as allotments/ orchards to provide healthy food options.

Respondent: Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure, and access to and enjoyment of nature.

While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment but may nonetheless have some effects. We therefore do not wish to provide specific comments especially relating to area design requirements, but advise you to consider the following broader issues:

Addressing climate change and conserving natural resources

Natural England supports the requirement for development to incorporate natural modes of travel, onsite renewable energy, reduced carbon emissions, water efficiency and flood resilience.

It is noted that proposed sustainable drainage system (SuDS) features should demonstrate compliance with the principles and standards set out in the CIRIA SuDS Manual. Natural England is supportive of this requirement and also would refer to the guidance for constructed wetlands: Introduction to Freshwater Wetlands for Improving Water Quality - JP044 (naturalengland.org.uk). This guidance is particularly important in Nutrient Neutrality catchments.

Context and identity

The SPD provides opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

An updated Landscape Character Assessment would be a useful evidence base to assess where there are opportunities to conserve and enhance the built and natural environment and record areas where there has been deterioration since the last assessment.

Public open space, nature, and water

The National Planning Policy Framework paragraph 175 states that local planning authorities should ‘take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’. The Planning Practice Guidance on Green Infrastructure (GI) provides more detail on this and also the recent Green Infrastructure Framework which helps Local Planning Authorities and developers meet GI requirements.

Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. The provision of street trees in the SPD along movement routes is welcomed to enhance and create opportunities for wildlife in urban areas.

A reference to the Norfolk Green Infrastructure Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) might be useful in this section for context. The strategy secures developer contributions from all new residential development across Norfolk based on the evidenced tariff-based approach, to make a substantial contribution to mitigating adverse impacts arising from planned housing growth at Habitats sites. It also commits to deliver enhanced GI with multiple benefits which is accessible locally to all Norfolk residents & tourists.

There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:

- green roof systems and roof gardens.
- green walls to provide insulation or shading and cooling.
- new tree planting or altering the management of land (e.g., management of verges to enhance biodiversity).

You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

Natural England supports the multi-functionality and connectedness of open, green, and blue space within the SPD. This will improve ecosystem functions and garner a range of improved ecosystem services provision which are vital for human health and wellbeing.

Natural England welcomes the requirements to maximise the opportunity of securing at least 10% Biodiversity Net Gain (BNG) on-site (PS4).

Building Design

Obtrusive light can cause visual detriment and species disturbance as well as impacting Dark Skies, a special feature of Protected Landscapes. The Institute of Lighting Professionals has useful guidance on mitigating impact through design (ILP Guidance Notes) and this could be included as a policy link to BD10.

Strategic Environmental Assessment/Habitats Regulations Assessment

An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project.

Natural England agrees with the conclusions of the Strategic Environmental Assessment (SEA) Screening Report, July 2023 that the SPD will not have any significant effects on the environment and therefore a full Strategic Environmental Assessment is not required.

The Habitat Regulations Assessment (HRA) Screening Report, July 2023, has identified no Likely Significant Effect to designated sites alone or in combination as the SPD does not promote or support new development in addition or different to that which is already supported through existing policies. Natural England agrees that no Appropriate Assessment is required.

Respondent: Bourne Leisure (via Agent: Lichfields)

On behalf of our client, Bourne Leisure Limited (“Bourne Leisure”), we are pleased to submit representations to the Draft Borough Wide Design Code Supplementary Planning Document (SPD) prepared by Great Yarmouth Borough Council (GYBC).

By way of background, Bourne Leisure operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within Great Yarmouth, Bourne Leisure operates four Haven holiday parks: Seashore Holiday Park, Caister-on-Sea Holiday Park, Hopton Holiday Village and Wild Duck Holiday Park.

This representation responds to the Draft Borough Wide Design Code Document and focusses on the following sections within the document: Scope and Purpose of the Design Code (Section 1.1); Status of the Design Code (Section 1.2); Borough Wide Design Requirements (Section 4); and Holiday Parks (Section 6.5).

Section 1.1 Scope and Purpose of the Design Code and Section 1.2 Status of the Design Code

Bourne Leisure acknowledges the importance of design guides/ codes informing development, reflecting national policy requirements in the NPPF (2021). Section 1.1 of the document sets out its purpose and states that the SPD is to be used as a ‘tool to assist in meeting the Strategic Objectives of the Adopted Local Plan’. This is in line with the definition of an SPD as set out at Paragraph 8 of the national Planning Practice Guidance.

Section 1.2 notes that ‘subject to potential reforms of the planning system, the Design Code may be incorporated into the new Local Plan or be adopted as a Supplementary Plan’. If the Design Code is brought forward through the Local Plan or a Supplementary Plan, we trust that this would be subject to further consultation.

Section 4: Borough Wide Design Requirements

The scope of Section 4 ‘Borough wide design requirements’ of the document appears to have been largely written in the context of residential development. Whilst some of these borough wide design codes are applicable to Holiday Parks, others promote design principles which are not applicable to the design and layout of holiday parks which by their nature relate differently to their surroundings in terms of streets, movement, parking, sustainability and built form e.g., the details of active heating and cooling for a building compared to a caravan.

As a further example, the figures within Section 4 illustrate the focus on residential and/or large-scale urban development, with no comparable reference to the layout of caravan pitches, internal roads, and parking in holiday parks.

Whilst the focus of the design code on residential development is understandable, greater clarity is required to recognise that not all the requirements will apply to holiday parks. Given a specific section has been included on Holiday Parks, we request that a clause is added in Section 4 or in Section 6.5 to reflect this point or, if necessary, section 6.5 is expanded to refer to the relevant requirements in Section 4.

Section 6.5: Holiday Parks

Bourne Leisure welcomes the acknowledgement in Section 6.5 that 'Holiday Park development forms an important part of the local economy' with specific design considerations relating to boundary treatments and relationship to surrounding context and landscape. However, we note that the second paragraph of this section states that 'The borough-wide requirements of the Design Code apply equally to holiday park development and the following points capture some of the priorities in terms of master planning and integration with context.'

As noted above, the borough wide requirements do not apply equally to holiday park development, and it is therefore necessary to provide greater clarity within Section 6.5 as to what requirements are most applicable.

Currently Section 6.5 highlights that the primary design consideration for holiday parks is integration within the surrounding context and landscape setting – with specific focus on boundary treatments, screening, external lighting and mitigating 'opportunities for recreational disturbance to natural wildlife/ landscape locations. Whilst we agree that these are key considerations the reference to mitigation of recreational disturbance appears to go beyond being a purely design matter.

This will require technical assessment of the impact of development, from which appropriate design or other forms of mitigation measures should flow. We therefore request that the first bullet point under the Landscape Setting heading is amended as below for consistency with policies CS8, CS15 and GSP5:

~~"Mitigate opportunities for~~ Minimise recreational disturbance to natural wildlife/landscape locations.

through the design of enhancements, ~~the movement network/connection to green spaces as well as~~ to suitable alternative natural green spaces for recreation and/ or to the movement network/connection to these spaces."

Figure 77 within Section 6.5 provides examples of boundary treatment types. The variation in these examples demonstrates that appropriate boundary treatments will differ on a case-by-case basis and there is not one singular approach that is advocated. Bourne Leisure endorses this approach to provide appropriate screening for holiday park developments. Whilst the current text notes that 'close board fencing is not appropriate' it should be noted that in some circumstances, e.g., where Holiday Park boundaries abut the gardens of neighbouring properties, this will be the most appropriate boundary treatment.

Respondent: Broads Authority

Summary of response

This is generally a well written and accessible and easy to understand document. The comments tend to relate to typos, grammar as well as lighting.

Comments

2.1 – probably not say Broads National Park as this is a planning document.... Maybe say equivalent status to a national park?

4.1 – grammar – ‘Climate change is the biggest challenge we face, and it is a strategic priority that all development proposals address it through mitigation and adaptation’ – need to address? Does that read better?

Page 18 – at the bottom – full glazing – lots of glazing can cause light pollution issues as well and needs to be mitigated.

Page 44 ‘through us of SuDS’ – should be ‘use’.

Page 57 – expected... might want to indent the bullet points 2, 3, and 4.

BD10 page 59 – should really ask if lighting is needed in the first place. This, as written, goes straight to providing lighting.

Page 60 – talks about deterring birds, but have you thought about a section on biodiversity enhancements? Like our guide: [Broads Authority biodiversity enhancements \(broads-authority.gov.uk\)](https://broads-authority.gov.uk). I know BNG is coming in, but not all development will be required to do BNG so something about biodiversity enhancements in the guide, rather than just doing things to stop birds perching might be prudent.

Within the Town Walls – would welcome reference to making the most of the waterside settings – for example, the North Quay area is on the boundary of the river and Broads so rather than turning its back on the water, maybe make the most of it and embrace it and face it?

Page 110 says ‘and it is preferable for rear gardens to form the while walking and cycling routes’... I don’t think the sentence reads right...

Section 6.3 – how does talking about retail and commercial units in out-of-town locations sit with the NPPF and local plans? Does it need to talk about out-of-town locations? Isn’t the section simply about industrial, commercial, and retail units? Further, as set out previously, in terms of lighting, isn’t the first step to justify the need for lighting in the first place?

Respondent: B. Oldham

I had a look at the spec. I am not a surveyor, environmentalist or have any experience of town planning only my life experience as an inhabitant of, Gorleston, Gt Yarmouth and now Bradwell. In that time, I’ve seen buildings have been torn down that never should have an art deco theatre, a brewery, fine buildings making way for a shopping mall that has had a short shelf life and recently a cobbled historic marketplace redesigned, costing plenty but doesn’t appeal to many according to social media comments.

Brown sites have to be used for building purposes, let’s not see unnecessary green spaces churned up with destruction to residing wildlife(Bradwell will soon link to Belton).

Progress with any development must be mindful, wise and have knowledgeable people on the serving committees with the authority to stop unqualified rich developers taking over. Save our town, our green spaces and develop with education in mind as no amount money spent on redevelopment will enhance a town where inhabitants have no pride. Build communities that foster this and reprimand those with no respect. Unfortunately, our borough council has a bad track record and needs to show its integrity for the community it serves and for whose taxes they are accountable for.

To all involved, do your best!

Respondent: Sports England

Thank you for inviting Sport England to comment on the above consultation.

The latest version of Sport England's [Active Design guidance](#) (AD3) was published in May 2023. The guidance sets out ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The principles are aimed at contributing to the Government's objective for the planning system to promote healthy communities through good design (paragraph 8 of the NPPF). Active Design complements the ten characteristics of well-designed places set out in the National Design Guide (NDG) and is considered part of the framework which underpins both that and the National Model Design Code (NMDC).

Sport England would encourage local authorities to use AD3 to help ensure their own policies and guidance are developed in accordance with the NPPF (with specific regard to paragraph 8, Section 8, and Section 12), the National Design Guide and the National Model Design Code.

The draft SPD includes reference to several of the key principles of active design covered in AD3 and this is welcomed by Sport England. However, some of the key principles have not been included and we would suggest some amendments could be made to include some of these which would make the draft guidance more effective in delivering the NPPF objective of promoting healthy communities through good design.

The Council may consider it beneficial to assess the draft code against the "[Active Design Checklist](#)" that has been prepared alongside the Active Design guidance. Although the checklist has been designed primarily as a way of assessing planning applications, it can also be used to assess whether policies or guidance have included an appropriate level of detail against each of the Active Design principles.

Section 4 of the draft SPD "Borough Wide Design Requirements"

In terms of specific comments against the draft SPD requirements under Section 4, Sport England would like to offer the following comments.

CC1: Ensure walking, cycling and public transport are the natural modes of travel for all users.

SM1: Create a walkable and integrated network of streets and pedestrian/cycle routes.

SM2: Design movement routes to clear and consistent standards which prioritise vulnerable users, children, pedestrians, and cyclists.

Sport England support the inclusion of a hierarchy of travel approach that is described under CC1, SM1 and SM2. Use of the term "active travel" explicitly in the requirements may be considered appropriate and this would align with the terminology used in the NMDC, NDG and AD3. We would suggest the current required and expected lists under CC1, SM1 and SM2 could be expanded further. Under the active travel theme in AD3 there are principles: 1) walkable communities, 2) providing connected active travel routes and 3) mixing uses and co-locating facilities. The draft SPD would benefit from greater consideration of each of these principles. For example, mixing uses and co-location of facilities (principle 4 of AD3) will mean more people are likely to combine trips and use active travel to get to destinations with multiple reasons to visit. The principle of mixing uses is an important factor in encouraging active travel, but this is not referenced at all in the draft SPD. We would suggest consideration should be given to the sub principles that relate to principle 4 in AD3:

- Avoid uniform 'zoning' of large areas to single uses.
- Create mixed use, connected focal points in prominent places within a community.
- Co-locate sport and recreation facilities alongside complementary uses.
- Use the public realm to create informal activity at sports/recreation facilities.

This could either be achieved through an expansion of the currently drafted requirements or a new requirement.

SM3: Create multifunctional streets which contribute to creating vibrant and active communities.

The principle of this requirement is supported as it accords with AD3.

SM4 Ensure the amount and design of cycle parking and storage incentivises cycling on an everyday basis.

Sport England fully support guidance that incentivises cycling. The requirements listed however only relate to residential development. It is important for the draft SPD to also include other uses, including employment and leisure. Requirements for secure cycling storage and other associated cycle infrastructure e.g., showers and lockers should also be included in the requirement lists for non-residential uses (see section 8.2 of AD3). It may be considered appropriate to also include this under draft policy CC1. As currently drafted CC1 only refers to quantity and location of cycle parking and storage.

PS2: Provide a sufficient quantity, type, and quality of public open space and green infrastructure with development.

Sport England fully support the principle of this requirement. This accords with theme 2 of AD3 (Active, high-quality places and spaces). Open space networks can provide a safe and attractive opportunity for active travel between destinations, as well as important spaces to be active. Sport England also fully support the requirement to consider the needs of all users in the design of public spaces as these accords with the overarching theme of AD3 of opportunity for all. The requirement for the spaces to be multi-functional is also fully supported. We would suggest other requirements not currently included in the draft SPD may also be considered appropriate to include (see Principle 5 of AD3), for example:

- Linking open spaces together within and beyond a site
- Integrating a diversity of natural habitats to make environments where people want to be outdoors and active.
- Making space for children's play

PS3: Ensure public access to watercourses.

Sport England fully support the principle of widening up accessibility to green and blue infrastructure. Consideration should also be given to how this will integrate with existing and other proposed active travel routes.

PS5: Include street trees along movement routes and as part of public spaces.

Sport England would welcome specific text that states that trees should be positioned carefully so that proposed and existing active travel routes and infrastructure are not blocked.

General comments

As shown above, active design is concerned with wider design issues, it is not just focussed on active travel. As such Sport England would suggest that the Active Design guidance is included in the Useful Resources section under each appropriate section.

Creating and maintaining activity is the third theme of AD3. Sport England suggest that the guide would also benefit from greater reference to appropriate maintenance. Further guidance is included in AD3 under Principle 9.

Respondent: Broadland Housing Association (via Agent: Bidwells)

On behalf of our clients, Broadland Housing Association (BHA), we are instructed to submit representations to the Borough Council's Great Yarmouth Design Code, Consultation Draft, Supplementary Planning Document (June 2023).

Whilst BHA support the principle of a Design Code, this representation seeks a significant rethink to the structure of the Design Code to ensure that it does not provide overly prescriptive and inflexible policies that have the potential to stifle good, innovative, design, whilst also adversely affecting the viability of development. In addition, amendments are sought to ensure that the Design Code is precise and, crucially, does not duplicate the requirements of other policies and legislation resulting in unclear guidance and unnecessary work for applicants.

Introduction

Overall, we support the objective of the Design Code to “set out clear principles and standards for how development should be designed in the borough, focussing on the priority aspects of design” (paragraph 1.1, GYBC Draft Design Codes).

However, we feel there are a number of Codes¹ which require amendments/ removal to ensure the Design Code has a focussed and positive impact on design in the Borough. The issues are explained in more detail within the paragraphs, but mainly relate to a number of the draft Codes unnecessarily duplicating the requirements of adopted planning policies; Building Regulations and matters covered by technical Statutory Consultees (such as Norfolk County Council Highways and the Lead Local Flood Authority), rather than priority aspects of design. With the exception of a limited number of cases, the Codes fail to provide further guidance on how adopted Development Plan policies will be delivered.

We therefore suggest that, in order to deliver a concise and focused document that provides certainty to users, that the volume of the Design Code is significantly reduced, and the number of criteria² within the remaining Design Codes is revised to allow for flexibility within the design process and to ensure that innovative design that would benefit the Borough is not stifled. The amendments will also ensure that development is not unduly constrained and, crucially, is viable.

These matters are explored in more detail below before a Schedule is provided as Appendix 1 which highlights which Codes should either be amended or reviewed.

Volume of Design Codes

The volume of Design Codes (total of 36 Design Codes) within the document is a key concern; each Code containing a mixture of ‘Required’ / ‘Expected’ / ‘Best Practice’ criterion. In total there are 173 criteria.

BHA agree that applicants should evidence good design within their schemes, but the overall number of criteria is excessive, and arguably does not highlight the ‘priority aspects of design’ within the Borough. It results in a somewhat cumbersome document for the user (119 pages) that covers a range of non-core design issues that duplicates matters covered by other policies of the adopted Development Plan or compulsory statutory guidance; placing an unnecessary burden on applicants and resulting in the document losing its key focus of highlighting the priority objective of the document.

The suggested amendments to the Design Code aims to provide a more focused document that is manageable and provides clarity on the design priorities within the Borough.

Definitions

¹ The Design Code ‘policies’ that this document relates to, for example ‘CC4: minimise potable water use’.

² The criterion that falls under the Design Codes, for example under CC4, the ‘Required’ criterion is to: ‘Design new residential development, and holiday accommodation in buildings to use 110 litres of potable water, per person per day, or less’.

The document stipulates that Design Codes (i.e., those not covered by ‘required’ criterion) are not mandatory, but it also notes, somewhat contradictorily *“if development proposals do not comply with these code requirements, the onus will be on applicants to demonstrate why compliance is not feasible or appropriate”* (paragraph 1.4, GYBC Design Codes).

As the majority of this criterion are not listed as ‘Required’ (153 of 173 criterion) and are not therefore covered by currently adopted national, or local policy, it is hard to understand the planning basis for developers being required to justify why they have not implemented certain criterion within schemes. The purpose of Supplementary Planning Documents is to provide further detailed guidance on the implementation of development plan policies; it is not to introduce new and more onerous requirements on applicants. The draft Codes have the potential to create substantial additional work and cost for developers, which goes beyond the requirements of the adopted Development Plan.

Furthermore, if one of the points of this document is to *‘signpost users to other sources of regulation, guidance, assessment tools and best practice’* (GYBC Design Code, paragraph 1.1), it is unclear why any form of justification or assessment is required.

This definition (which we assume is for ‘Expected’ rather than ‘Best Practice’ criterion) should therefore be amended to make it clear that this is not a requirement for all new development, but examples of good practice that applicants will be encouraged to explore. Accordingly, if the criterion is to be retained, they should state that they represent examples of good practice and that, where practical, feasible, and appropriate, applicants should seek to incorporate within developments.

Duplication - Planning Policy, Statutory Consultees and Building Regulations

The Design Code notes that this document *“is not an exhaustive design manual for every detail and is not a substitute for commissioning suitably qualified and experienced professional designers and consultants to prepare proposals and the supporting technical information required”* (paragraph 1.1, GYBC Draft Design Codes). But in its current manifestation, this is arguably not the case.

As well as extending to 119 pages, the document has a number of Codes that duplicate and, in many cases, contradict the current guidance relevant to ‘suitably qualified and experienced professional designers and consultants’, including statutory consultees and regulatory guidance such as the Lead Local Flood Authority, Norfolk County Council, as well as the requirements of Building Regulations.

Aside from causing confusion on what are the most pertinent design issues within the Borough, and what will be used within the planning balance for the determination of planning applications, the requirements of statutory consultees and Building Regulations are subject to constant change, at a faster rate than planning policy, as new regulations come into force. This would create additional confusion if, very quickly after adoption, the Design Code provides guidance on technical matters that differs from advice being provided by statutory consultees. Furthermore, the Design Code should not inadvertently impose unintended consequences on the viability of future planning applications, for example via the insistence of highway design features which contradict guidance of the statutory authority or impose substantial additional costs if these features are adopted or refused adoption by the authority.

Paragraph 1.5 of GYBC Design Codes seeks to provide further clarity of how the Design Codes should be used, noting that the users should identify which code requirements are applicable to the specific proposal under consideration, through relevant planning policy, relevant borough wide requirements, relevant character areas, and the type of development proposed. However, it is our opinion that Design Codes should not effectively introduce new ‘local’ planning policies or repeat or conflict with existing strategic or local planning policies that are already in place within the Adopted Local Plan, National Planning Policy Framework (NPPF), or other relevant policy. In many cases, the Codes provide less information than is actually provided within the adopted Policy.

The NPPF 2023 highlights this point for the creation of Local Plan documents, noting that Plans should ‘*serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)*’ (paragraph 16f). Whilst noting that the Design Code is not a Plan, the principle of producing documents that are clear, concise and avoid unnecessary duplication is pertinent.

The NPPF (2023) also requires plans to “*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*” (paragraph 16d). The Codes provide, in most cases, very little detail on how the application of the criterion will be benchmarked / assessed, creating a significant amount of uncertainty for the applicant.

Summary & Recommendations

Based on the foregoing, this Representation seeks a significant rethink to the structure of the Design Code to ensure that it does not provide overly prescriptive and inflexible policies that have the potential to stifle good, innovative, design, whilst also adversely affecting the viability of development. Further detail on the proposed revisions is attached as Appendix 1. The amendments are sought to ensure that the Design Code is precise and, crucially, does not duplicate the requirements of other policies and legislation resulting in unnecessary work for applicants.

Broadland Housing, who have a reputation for delivering high quality sustainable design across Norfolk and Suffolk, would welcome the opportunity to discuss these proposed changes with the Council in more detail at the earliest available opportunity.

Appendix 1

CC1: The objectives of the code are not ‘required’, only ‘expected’, therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Furthermore, the Criterion of the Code are unqualified and don’t provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants. Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

CC1 Recommendation: Remove

If the Code is retained, the criteria should be amended to provide appropriate benchmarks against which they can be assessed.

As a general point that applies to the majority of Codes, if criterion is to be included within the Codes, it should be made clear that they are examples of good practice and that, where practical, feasible, and appropriate, applicants should seek to incorporate within developments.

CC2: The objectives of the code are not ‘required’, only ‘expected’, and ‘best practice’, therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

In addition, to the comments above, all new development would be covered by Policy CS12 of the Adopted Development Plan which will need to be addressed by any applicant. Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Furthermore, the Criterion of the Code are unqualified, potentially contradictory to building regulations, and don’t provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CC2 Recommendation: Remove

If the Design Code is retained, the criteria should be amended to provide appropriate benchmarks against which they can be assessed.

CC3: The requirements of the code are not 'required', only 'expected', and 'best practice', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Rather than expecting, for example, air source or ground source heat pumps to be provided within development, the Design Guide should be focussing on key design elements that should be considered as part of their design, such as the location, potential nuisance, visual impact, and level of noise of these systems.

CC3 Recommendation: Remove

If the Design Code is retained, it should be amended to reflect key design elements, rather than introducing new design requirements that go beyond the requirements of adopted Development Plan policy.

CC4: The criterion of the Code is not considered to relate to priority aspects of design and is covered by Policy E7 of the Adopted Development Plan. To avoid unnecessary duplication within the Design Guide, this code should be removed.

In addition, the Design Code does not provide any advice on how the restriction of 110 litres of potable water per person should be incorporated into schemes.

The remaining criterion of the Code are not considered necessary as they are 'expected' and best practice'; criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

CC4 Recommendation: Remove

If the Code is retained, further information is required on how proposals will be required to achieve the 110 litres of potable water criteria in practice.

CC5: The requirements of the code are not 'required', only 'expected', and 'best practice', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

In any event, the criterion is unqualified with no benchmarks and has no regard to the practicality or feasibility of development retaining existing structures. Flexibility therefore needs to be incorporated within the Design Code.

CC5 Recommendation: Remove.

If the Design Code is retained, flexibility is required to ensure it reflects what is practical and feasible.

CC6: The 'Required' criterion of the Code is not considered to relate to priority aspects of design and is covered by Policy CS13 of the Adopted Development Plan, and, accordingly, will need to be addressed as part of any application, having regard to comments from the LLFA and Environment Agency.

The remaining criterion of the Code are not considered necessary as they are 'expected' and best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., they

are not 'Required' criterion), and would also be required to have regard to comments from the LLFA, Environment Agency and comply with Building Regulations.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

CC6 Recommendation: Remove.

CC7: Rather than Policy CS12, we feel this Design Code better relates to Policy CS13 of the adopted Development Plan. Nonetheless, the 'Required' criterion of the Code is not considered to relate to priority aspects of design and any proposals will be required to have regard to comments from the LLFA in relation to the Suds hierarchy.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would also be required to have regard to comments from the LLFA.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

In any event, the criterion of the 'expected' Code in relation to permeable and absorbent surfaces on site are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CC7 Recommendation: Remove.

If the Design Code is retained, the criteria should be amended to provide appropriate benchmarks against which they can be assessed.

CC8: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Furthermore, it is unclear how the requirements of the Code will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CC8 Recommendation: Remove

If Design Code is retained, further information is required on how proposals will be required to achieve this in practice.

CC9: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Furthermore, it is unclear how the requirements of the Code will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CC9 Recommendation: Remove

If Design Code is retained, further information is required on how proposals will be required to achieve this in practice.

CI1: We support, in principle the specifications of the 'required' aspects of this policy. The requirement clearly relates to a policy and provides greater clarity of what is required.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

CI1 Recommendation: Remove 'expected' criteria of the Design Code.

CI2: To ensure a consistent approach with the other Design Codes contained within this document, the 'expected' criteria, aside from the criteria relating to signage should be amended to 'required' criterion, as this accords with adopted Development Plan policy.

Nonetheless, to prevent the duplication of information contained within Policy CS10 and E5 of the Adopted Development Plan, this Design Code should be removed. Furthermore, the measurement of significance in relation to heritage assets is not qualified, nor the metrics by which it can be enhanced.

CI2 Recommendation: Remove

CI3: The 'Required' criterion of the Code is covered by Policy CS9 and **A2** of the Adopted Development Plan and should be removed to prevent duplication.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

CI3 Recommendation: Remove

If Design code is retained, further information is required on how proposals will be required to achieve this in practice.

CI4: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Furthermore, the criterion under this Design Code largely repeats the criterion under CI1, and it therefore is difficult to understand what additional benefit this would provide to design.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

CI4 Recommendation: Remove

SM1: The 'Required' criterion of the Code is covered by Policy CS9 and GSP7 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, to prevent replication, this is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM1 Recommendation: Remove

If Design code is retained, further information is required on how proposals will be required to achieve this in practice.

SM2: The 'Required' criterion of the Code is covered by Policy CS9 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, To prevent repetition, this is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' and 'best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and should therefore be removed.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM2 Recommendation: Remove

If Design code is retained, further information is required on how proposals will be required to achieve this in practice.

SM3: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

In any event, the criterion should not request development to follow homezone/Woonerf street principles as it could stifle new, innovative design or impose unintended impediments on the ability to adopt highways infrastructure. Flexibility therefore needs to be incorporated within the Design Code if it is to be retained.

SM3 Recommendation: Remove

If the Design Code is retained, it will require flexibility to ensure it does not stifle innovation within design.

SM4: The 'Required' criterion of the Code is covered by Policy CS9 and I1 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, to prevent repetition, it is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would cause confusion with the adopted Norfolk County Highways Parking Standards documentation.

It is also unclear how the proposed expected and best practice criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM4 Recommendation: Remove

If the Design code is retained, amendments would be required to ensure the criterion does not conflict with Norfolk County Highways technical documents, and further information would be required on how proposals will be required to achieve the criterion in practice.

SM5: The 'Required' criterion of the Code is covered by Policy CS9 and I1 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, to prevent repetition, it is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' and 'best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would cause confusion with the adopted Norfolk County Highways Parking Standards documentation and have regard to comments from the Lead Local Flood Authority.

It is also unclear how the proposed expected and best practice criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM5 Recommendation: Remove

If the Design code is retained, amendments would be required to ensure the criterion does not conflict with Norfolk County Highways technical documents, and further information would be required on how proposals will be required to achieve the criterion in practice.

SM6: The 'Required' criterion of the Code is covered by Policy CS9 of the Adopted Development Plan and will need to be addressed as part of any application, having regard to comments from Norfolk County Highways. Accordingly, to prevent repetition, it is not considered necessary to incorporate the Code within the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' and 'best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would also be required to have regard to comments from Norfolk County Highways.

It is also unclear how the proposed expected and best practice criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

SM6 Recommendation: Remove

If the Design code is retained, further information would be required on how proposals will be required to achieve the criterion in practice.

PS1: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

Furthermore, the criterion under this Design Code largely repeats the criterion under CI1, or what would be covered by Biodiversity Net Gain policies. On this basis, it is difficult to understand what additional benefit this Code would provide.

PS1 Recommendation: Remove

PS2: The 'Required' criterion of the Code is covered by Policy GSP6 and H4 of the Adopted Development Plan and will need to be assessed against the Open Space SPD. The fact this policy replicates another SPD document highlights that this Code is not necessary. Accordingly, to prevent replication, this Code should be removed from the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' and 'best practice' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), and would also be required to have regard to the Open Space SPD, and comments from the Lead Local Flood Authority.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

It is also unclear how the proposed expected and best practice criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

PS2 Recommendation: Remove

PS3: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy. All new development would be required to have regard to comments from the Lead Local Flood Authority, including in respect to public safety.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

It is also unclear how the proposed Expected and Best Practice Criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

PS3 Recommendation: Remove

If the Design code is retained, further information would be required on how proposals will be required to achieve the criterion in practice.

PS4: The 'Required' aspects of the Code would be covered by the Biodiversity Net Gain processes, and accordingly to prevent replication, this Code should be removed from the Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion). All new development will also be required to accord with Biodiversity Net Gain documentation, the Open Spaces SPD, and have regard to comments from the Lead Local Flood Authority.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

It is also unclear how the proposed Expected and Best Practice Criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

PS4 Recommendation: Remove

PS5: The requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy.

It is also unclear how the proposed Expected Criterion will be benchmarked or assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

The Criterion is also dependent on the adoption requirements of the Norfolk County Council Highways, which will have a significant influence on the ability to satisfy the Criterion and are outside the control of the Council.

PS5 Recommendation: Remove

BF1: The 'required' aspects of the code are largely covered by Policy CS1, CS9 and A2 of the adopted Local Plan and should therefore be removed to prevent replication within Design Guide.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion). Furthermore, all criterion of this design code largely repeats the criterion under CI1, therefore it's difficult to understand what additional benefit this would provide to design.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

BF1 Recommendation: Remove

If Design code is retained, further information is required on how proposals will be required to achieve this in practice.

BF2: As part of good practice, the principles of Design Code BF2 should be achieved. Nonetheless, the requirements of the code are not 'required', only 'expected', therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy and should therefore be removed.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants. It would be helpful to understand how you would like to see the Design Guide being implemented.

BF2 Recommendation: Remove

If Design Code is retained, further information is required on how proposals will be required to achieve this in practice.

BF3: To ensure a consistent approach with the other Design Codes contained within this document, the 'expected' criteria, relating to indicative minimum housing densities should be amended to 'required' criterion, as this accords with adopted Development Plan policy. Nonetheless, to prevent the duplication of information contained within Policy H3 of the Adopted Development Plan, all existing and proposed 'required' criterion should be removed.

The remaining criterion of the Code are not considered necessary as they are 'expected' criterion which go beyond the requirements of adopted Development Plan policy (i.e., there are no 'Required' criterion), or are noted within the supporting text of Policy H3 of the adopted Development Plan. For example, paragraph 6.10 notes that areas of on-site open space should be excluded from density calculations.

Furthermore, within the 'expected' criterion, it is not clear what the policy justification, or benchmark criterion should be for the various density of development measurements.

BF3 Recommendation: Remove

If Design code is retained, further information is required on why and how proposals will be required to achieve the various density of development measurements.

BF4: The requirements of the Code are not 'required', only 'expected', and 'best practice' therefore the criterion of the Code is not considered necessary as they go beyond the requirements of adopted Development Plan policy. It is also unclear how this Design Code can be linked to Policy A1 of the adopted Development Plan.

Furthermore, the Criterion of the Code are unqualified and don't provide a benchmark against which they can be assessed; resulting in the guidance being very subjective and failing to provide clarity for applicants.

Accordingly, it is not considered necessary to incorporate the Code within the Design Guide.

BF4 Recommendation: Remove

If Design code is retained, justification of required to understand how this Code can be linked to Policy A1 of the adopted Development Plan.

BD1: Whilst we accept that the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; the entirety of this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design. We therefore recommend that 'expected' criteria is instead labelled 'good practice' and with the definition amended to reflect these comments.

BD1 Recommendation: Amend the definition of 'expected' criterion to 'good practice'.

BD2: Whilst we accept that the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; the entirety of this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design. We therefore recommend that 'expected' criteria is instead labelled 'good practice' and with the definition amended to reflect these comments.

BD2 Recommendation: Amend the definition of 'expected' criterion to 'good practice'.

BD3: Whilst we accept that the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; the majority of this code is covered by Building Regulations and should therefore be removed to prevent confusion between and duplication of information.

BD3 Recommendations: Remove criterion that falls within Building Regulations.

Amend the definition of 'expected' criterion to 'good practice'.

BD4: Whilst we accept that the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

Furthermore, the criterion is unqualified in respect to any benchmark metric.

BD4 Recommendations: Amend the definition of 'expected' criterion to 'good practice'.

BD5: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

This criterion raises particular concerns in respect to unintended consequences arising from its highly specific nature, including the potential to undermine the ability to meet other criterion including in respect to minimum development densities and also the potential imposition of specific constraints, particularly with respect to existing brownfield or urban sites in town centre locations whereby these overly generous back-to-back distances may not be achievable or may adversely affect development viability by limiting the built form envelope.

We also recommend the wording of the criterion is amended with additional flexibility, to reflect that it is not always practical and feasible to provide this criterion benchmark.

BD5 Recommendations: Amend the definition of 'expected' criterion to 'good practice' and insert flexibility into the wording of the criterion to ensure it reflects what is practical and feasible to achieve in practice.

Have regard to the aspirations of other Codes and policies, particularly those relating to the need to secure the efficient use of land in urban areas.

BD6: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

BD6 Recommendations: Amend the definition of 'expected' criterion to 'good practice'

BD7: Whilst we accept the provisions of the 'required' criteria are good practice that applicants should be encouraged to follow in accordance with Policy A1 of the Adopted Development Plan; aside from meeting the requirements of the local waste service, there is no benchmark against which the development should be assessed.

Furthermore, we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and

applicants should therefore not be required to justify why this criterion has not been adhered to within design.

BD7 Recommendations: Amend the criteria to provide appropriate benchmarks against which they can be assessed.

Amend the definition of 'expected' criterion to 'good practice'.

BD8: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

BD8 Recommendations: Amend the definition of 'expected' criterion to 'good practice'.

BD9: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

Furthermore, to insure there is clarity surrounding criterion relating to boundary treatments, there should be a benchmark to which development should be assessed.

BD9 Recommendations: Amend the criteria to provide appropriate benchmarks against which they can be assessed.

Amend the definition of 'expected' criterion to 'good practice'.

BD10: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

Furthermore, to insure there is clarity surrounding the criterion there should be a benchmark to which development should be assessed and ensure the council is clear how competing interests, both to avoid excessive light pollution and to ensure vulnerable user groups feel safe at night should be implemented.

BD10 Recommendations: Amend the criteria to provide appropriate benchmarks against which they can be assessed.

Amend the definition of 'expected' criterion to 'good practice'.

BD11: Whilst we accept the provisions of this criteria may be deemed good practice that applicants should be encouraged to follow; we recommend that 'expected' criteria is instead labelled 'good practice' to reflect that this code goes beyond the requirements of the adopted Development Plan policy and applicants should therefore not be required to justify why this criterion has not been adhered to within design.

BD11 Recommendations: Amend the definition of 'expected' criterion to 'good practice'.

Respondent: A. Harris

So pleased that there is to be a clear set of principles and standards that will apply to all new development's borough wide. There has been too much undertaken on a piece meal or individual case by case approach in the past. This will improve the design quality of new developments with particular attention to shop fronts, North Quay, and Town Hall Quay development plans. This additional guidance will add important planning details to the existing Local Plan and ensure Best practice. Developments must be timely and not unduly delayed through multiple unnecessary appeals etc.

Respondent: Persimmon Homes

Persimmon Homes Anglia have given the GYBC Draft Design Codes detailed consideration and have provided a response to specific Codes. We understand that a distinction has been made under what is 'required' (red), 'expected' (amber), and 'best practice' (green). Our main concern is that the Design Codes may be treated as prescriptive and inflexible. We would hope that the planning officers give due consideration to site circumstances, applying flexibility where appropriate. It is also important to have confidence that what is defined as 'expected' does not morph into what is 'required' under the Code. We seek assurance that GYBC will allow flexibility and exercise a certain amount of judgement over the site, wherein the applicant can demonstrate that the site requires departures, this can be facilitated where justification is provided.

Overall, our main concern is the achievability of meeting the aspirations of the Design Code in context of the character, geography, and topography of the Borough. An example of this is how the minimum density requirements can be achieved taking into account the aspirations/requirements of street typologies road/street widths, as well as privacy requirements and minimum back-to-back distances. We believe that the Council needs to clarify their priorities in terms of efficient land use and density. We see that GYBC prioritises effective layouts and densities which is seen in the GYBC Local Plan under policies CS3, UCS9, CS12, and H3. The NPPF prioritises sustainable development. Specifically, Paragraph 124 sets out the approach for achieving appropriate densities of development. Decisions should support development that makes efficient use of land, taking into account: the identified need for different types of housing and other forms of development; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting; and the importance of securing well-designed, attractive, and healthy places. Paragraph 125 recognises that where there is an existing shortage of land for meeting an identified housing need, it is important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. We acknowledge that good design is at the heart of sustainable development. However, the use of prescriptive measures within a layout can be detrimental to the effective use of space and makes it difficult to achieve the minimum densities required.

We are also concerned that the aspirations of GYBC may not meet the requirements of the NCC Highway Authority and we seek certainty that the Highway Authority will adhere to any adopted guidance such as the Design Codes. As we require technical approval from NCC Highways, it is imperative to us that they have bought in to these Design Codes. We see huge differences in what is approved by the LPA and NCC Highways across all of our sites, and this can cause major delays to the delivery of our schemes.

In light of the above, we would like to attend the committee meeting for the hearing to adopt the Design Codes within the Borough, so that we can raise our concerns.

Please see below in tabular format, our response to the Draft Design Codes.

CC1: With regards to parking and its quantity/location, the Council should demonstrate how they will achieve cooperation from the Highway Authority. This is essential to enable good quality

developments that meet the needs of all stakeholders and to avoid uncertainty and delay in the delivery of development proposals.

CI3: Please provide clarity on the definition of 'character areas', what they entail, and at what stage of development this will be given weight at? Would this be expected to be set out at outline stage or would be captured at reserved matters stage only? If required in phase within a large-scale development, this can result in disjointed clusters and jarring incompatible urban design features. See comments on 6.1 also below.

SM2: The examples sections of the new street layouts (primary, secondary, local streets, and tertiary streets) provide specific carriageway, footway, and cycleway widths. Please advise on the origin of these examples and how they relate to development within the Borough. Referencing to generic requirements that bear no resemblance to established development patterns, run contrary to the aspirations set out in 6.1 of the Design Code documents and would present and prohibit cohesion with host communities in most cases. What degree of flexibility will be applied to take account of site circumstances? The examples provided show road widths appear unrelated to existing settlements and could give rise to inefficient developments that do not relate their local context. We believe that this will have major impacts on viability of developments.

We also believe that there can be conflicts between the Council's objectives and those of the Highway Authority, and this conflict can be seen in terms of parking, circulation, road/street requirements, and servicing and safety.

Additionally, LTN 1/20 is only to be applied to main distributors' roads, and there is conflict between LTN 1/20 and the Manual for Streets 1 & 2. MFS dictates that all roads must adhere to a strict user hierarchy that prioritises pedestrians and cyclists. It would be beneficial to draw this out amongst all of the Street, Movements and Parking Codes, to make it clear what policies/guidance take precedence.

SM3: None of the examples provided to accompany this draft Code include any local referencing. It is unclear how this development would assimilate into or indeed respond to the established built form present in the Borough. Whilst the concepts set out in SM3 are admirable and are accepted as good placemaking, there needs to be an injection of realism on how these features would be delivered.

With the integration of seating/informal play and other functional features into the streets, it would be helpful to get certainty from the Highway Authority that there will not be objections raised in terms of the inclusion of such features and the application of NCC parking standards.

SM4: The requirement of this Code is extremely prescriptive and does not allow for variation of house types or allow for flexibility due to space/density conflicts. The Code needs to clearly define whether it relates to urban/flatted developments and its differentiation from suburban developments.

We also suggest the following amendments to this Code:

Under 'Expected'

- *For dwellings, provide resident cycle parking as per the NCC Minimum Parking Standards.*
- *For HMOs, provide 1 resident cycle space per bed space, and 1 visitor space per dwelling (which can be uncovered and outside of a secure enclosure, e.g., a Sheffield stand).*
- *For retirement housing, provide 1 secure resident cycle space, and one visitor cycle space, per two bed spaces. Many older people use cycles, and in particular e-bikes, for exercise and leisure.*

Under 'Best Practice':

- *For all residential cycle storage, provide one electric outlet per two cycle spaces to facilitate e-bike charging.*
- *Provide adequate secure cycle storage to accommodate at least one cargo bike per dwelling.*
- *Cycle storage must be additional to garages counted as an allocated parking space. Garages can be counted as allocated parking spaces for cycle storage where adequate on plot parking is provided.*
- *Cycle storage can be within curtilage of dwelling but must be secure and covered e.g., cycle locker; dedicated store/shed; dedicated space within hallway/ secure porch; dedicated space within expanded garage.*
- *Locate cycle storage closer to entrance doors, than car parking/ storage.*
- *Ensure cycle storage is secure and naturally overlooked to deter theft.*

SM5: Some of the points expected under this policy conflict with each other: “Include a mix of parking solutions (on-plot, on-street, shared parking areas/courts) to avoid a car-dominated environment.”

Directly conflicts with:

“Deter unplanned on-street parking through the design and layout of streets, and through inclusion and enforcement of parking restrictions.”

We have serious concerns relating to reliance on-street parking, anywhere other than within the town centre. It raises uncertainty over ownership regarding parking and, unfortunately, will eventually lead to unplanned on-street parking as well. The provision of on-street parking also directly conflicts with the NCC parking standards. Will GYBC prioritise the requirements of the Design Code over NCC parking standards?

PS2: We seek comfort in that if site circumstances can justify a departure from the Open Space SPD, some flexibility will be allowed.

PS5: The example trees listed under this Code are salt tolerant species but high-water demand trees – if they were placed on a clay-soil based site, the roots of the tree could cause damage to building foundations and roads. Therefore, we do not believe it is sensible to force this upon developers and should be left to ecologists to deem what is appropriate and not on a site-by-site bases. We also believe the term “close to the sea” is ambiguous and believe more context should be given here.

PS3: We would seek flexibility on this, as access is dependent on ROSPA requirements, particularly where play spaces are being created.

BF1: We would expect that the Area Specific Design Codes were applied as a condition under an outline permission, or there is flexibility that is proportionate to the scale and the stage of the development.

BF2: *“In lower density locations, the scale of street trees should be at least as tall as buildings when mature”*. There should be flexibility that responds to the site circumstances in this case.

Otherwise, we would seek assurances that there was a framework available that detailed the appropriate species for trees in these types of locations.

In addition, the requirement illustrated in fig 3.2 that shows the recommended ratios of building heights to widths, should be applied on a case-by-case basis with the local context in mind. This Code creates potential conflict with the density’s requirements enshrined in the Local Plan– and relates back to our response regarding Design Codes SM2, SM3, SM4, and SM5.

We believe that to lift examples from the National Model Design Code (NMDC) and relate without reference to the Great Yarmouth Borough does not represent adequate justification. There is no explanation of what the active frontage percentage is and how it related to the enclosure ratio.

The NMDC function and status is to provide a common overarching framework for design throughout the country and this then trickles into local design guides. To lift examples from it without providing local context is ineffective.

Further rational is required that justifies this Code in context of established development in Great Yarmouth Borough and Norfolk, if appropriate.

As it currently stands, the imposition of apparently unjustified requirements such as these could have a significant impact on viability based on unachievable densities conflicting with prescriptive road/street widths.

BF3: Relating back to BF2, there is conflict that arises from achieving minimum densities while also achieving minimum back-to-back distances and road/street widths on the development. Clarity needs to be provided on what is the main priority within new developments in the Borough.

We also query the relevance of providing the following density measurements in planning applications:

- number of habitable rooms per hectare
- number of bedrooms per hectare
- number of bed spaces per hectare

As the council provides a density requirement through dwellings per hectare measurements.

BD3: We believe that meeting the M4(2) requirements should reflect the requirements of the adopted Local Plan and Building Regulations. These policies show that flexibility is permitted in certain situations, such as flats that are above ground floor level.

BD5: We note the aspiration in what is trying to be achieved here, however, we seek to ensure flexibility surrounding minimum separation distances that respond to the site circumstance.

There is no evidence provided to justify the minimum distances stipulated. There are a variety of accepted privacy thresholds applied both locally and across the Region. The stated stipulations do not account for individual site circumstances or other measures that could be employed to secure adequate levels of privacy.

We consider that 20m back-to-back distances between new builds is more realistic and acceptable. Flexibility on this and other measures, will maximise opportunities for successful, efficient layouts and assist in the overall goal of achieving minimum densities.

BD6: This policy conflicts with density requirements. It is unrealistic to be setting minimum requirements for private amenity space as it is not reflective of modern densities in the Borough and wider county. We suggest that the requirement for balconies sizing can be offset by access to good quality public open space. We consider the stated minimum amenity space requirements to be unduly prescriptive and could give rise to serious conflicts with the NPPF Section 11 “Making Effective Use of Land” and the Council’s own minimum density requirements.

For this Design Code, we would anticipate that GYBC exercises sound judgement and allows for flexibility in the application of the part of the Code. Not all balconies for flats mesh with the context/character areas of the surrounding as well and this can be difficult to demonstrate within the DAS and planning statements. In addition, we can advise that registered providers resist balconies due to health and safety and management reasons.

BD7: We believe that what is 'expected' under this Code should be applicable only to flats as larger new build housing developments will have separate areas for refuse storage separate from the dwellings themselves. Design matters should be judged on a case-by-case basis and reflect the function and form of the structures and their prominence in the particular street scene.

BD8: Restrictions on the locations of utility and meter boxes in unobtrusive locations needs to be applied to reflect design restrictions on certain dwelling types. For example, on terraced houses – these boxes must be put on primary elevations.

BD9: We request flexibility under this Code as existing hedge lines should be taken into account.

BD10: We believe some elements under this Design Code are contradictory, as it is difficult to protect dark skies while also potentially providing excessive street lighting.

6.1: 'Relationship to landscape'

The 1st paragraph of the section does not make sense and includes typographical errors. We would question whether it is appropriate or desirable in urban design terms to promote rear boundaries as an appropriate mechanism to face onto the footpaths and cycleways from a visual interest and natural surveillance perspective.

'Integration with 'host' community'

There is a focus on seamless integration with existing communities in terms of networks of streets and routes to local destinations. This is acknowledged and attention is drawn to the requirements of SM2 and how that could run contrary to this aspiration in terms of form and character.

Pattern of development'

Again, reference is made to drawing on the built character of existing development in this Section. It runs contrary to a number of the requirements of the Code in relation to the form, layout and typologies set out earlier in the document and need to reconcile with settlement specific circumstances and aspirations for the built form in that area, if truly successful integration is to be achieved.

Reference is made in the draft Code to character areas at street or cluster level. This is not justified in the document in any way other than a comment that it functions as an instrument to avoid generic layout and hose types. Will the Council be providing a detailed analysis of what articulated any further and provides no signposting on how it is envisaged that it could be achieved in a manner that does not give rise to a patchwork of styles and design, particularly if these requirements are to be imposed on such a micro-scale. The Code needs to provide better.

Respondent: Anglian Water

4.1 Addressing climate change and conserving resources.

The Anglian Water region is identified as seriously water stressed, we would support reference to also maximising water efficiency in new developments and regeneration/redevelopment of existing urban areas.

RECOMMENDATION: We would welcome an additional bullet point those states "Maximising water efficiency in new developments through water efficient fixtures and integrated water reuse/recycling measures"

CC4: Minimise potable water use.

Anglian Water supports the inclusion of this code.

We recommend that the code should also reference that the Government's Environmental Improvement Plan which sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water would encourage this standard to be referenced as a minimum standard in the design code "Required" section using a fittings-based approach.

We agree with the "Expected" and "Best Practice" sections and would advocate that the emerging local plan incorporates these as policy requirements.

CC5: Reduce embodied carbon emissions resulting from construction.

Anglian Water supports the inclusion of this code. Our long-term ambition to be a net zero business by 2030 in terms of our operational carbon, also includes a target to reduce our capital/embodied carbon by 70% against a 2010 baseline. Our recently published [Business Plan](#) for AMP8 states that in achieving our capital carbon target by 2030, a 20% reduction in the carbon from concrete will be achieved.

CC7: Reduce the risk of surface water flooding on and around the site.

Anglian Water welcome the inclusion of this code within the SPD. We encourage developers to prioritise the use of SuDS in new developments, and Anglian Water will consider adopting SuDS where they meet our specifications, which can be found on our website.

It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024. However, we welcome this design code to ensure SuDS are incorporated in new developments, until the Schedule is formally implemented, and the necessary measures are in place.

Under the "Expected" section of the code, we would recommend that the multi-functional and integrated aspects of SuDS should also include reference to rainwater/stormwater harvesting and reuse in new developments - helping to reduce the per capita consumption of potable water by utilising rainwater for flushing toilets and irrigation for example. This helps new developments achieve more ambitious water efficiency standards in a region identified as seriously water stressed.

CI1: Design with regard to local context, including the surrounding built environment, topography, landscape, and drainage.

Anglian Water supports the reference to drainage in the code, but notes that further reference is limited in the "Required" and "Expected" areas, with the exception of green and blue spaces. The topography/landform and soils on a site are key to informing green and blue infrastructure (GBI) and we would advocate that GBI is designed in from the start to ensure that SuDS are strategically located to optimise surface water management and integrated water management opportunities and should be a "Required" element of the code.

PS1: Integrate existing natural features, including water and trees, in site layouts.

Anglian Water is supportive of a design-led approach that is framed and led by green and blue infrastructure opportunities and focusses on the existing environmental/natural assets present on the site, which helps to assimilate biodiversity net gains and positive benefits for surface water management.

PS4: Improve biodiversity on and around the development site.

Anglian Water would welcome a reference in this design code to the emerging Local Nature Recovery Strategy for Norfolk, to assist developers with designs that improve habitat connectivity and habitat creation.

PS5: Include street trees along movement routes and as part of public spaces.

Anglian Water agrees that the location of street trees can helpfully align with the provision of SuDS along highways and streets. Street trees provide multi-functional benefits, particularly in urban areas, however, they should be designed to take account of minimising impacts on underground utilities such as water mains and sewers - particularly where street trees are planted in existing developments as part of wider regeneration objectives.

For trees to thrive they need space for root development in the underlying soil, which must be of sufficient capacity to accommodate the rooting habits of the particular species, without impacting on the functioning of our underground assets. In new developments we advise that a sewer or lateral drain should not be located closer to trees/bushes/shrubs than the canopy width at mature height, except where special protection measures are provided - such as use of appropriate barriers to resist root ingress to the sewer system. A tree should not be planted directly over sewers or where excavation onto the sewer would require removal of the tree. To minimise the risk of root damage, tree planting should provide good growing conditions. Guidance can be found in 'Trees in Hard Landscapes: A Guide for Delivery'.

Respondent: R. Clarke

I have read through this document with interest and it's very detailed but is it practicable to use examples from around the country as to where GY wants to be but what has been done to ensure that these examples have made that environment better for those communities?

Respondent: East Suffolk Council

Thank you for consulting ESC on the draft design Code. ESC has no comment to make, although we would like to commend the high quality of the work and the clarity with which it is presented.

Respondent: Hemsby Parish Council

It was agreed that representation be sent to GYBC that the Parish Council was extremely disappointed having spent almost three years to get their own Neighbourhood Plan & Design Codes to adoption stage in June 2023 and to pass the referendum, only to find that a significant number of them are now to be undermined by this GYBC's version which seeks to dilute the vision of Hemsby's residents that was formulated using their responses and desires for all future planning in Hemsby.

The main differences with the Hemsby NHP and Design Code are as follows:

CC7 suds - fencing of them, they wish to see fences of over knee height to deter children.

BD1 housing/garage alignment to the front of properties not the rear as suggested in the local plan.

BF3 density - houses per hectare, they wish this to be in line with the Hemsby NHP design codes not the increased amount shown for Hemsby of 30 minimum per hectare.

c14 design- they are not aligned to the Hemsby NHP in the exterior materials i.e., windows, roofing, or cladding materials.

bd9 boundary treatments seems to state 1m or below boundaries & on page 59 it states below 1.2m

ps4 improve bio-diversity - avoid installation of living walls, but the Hemsby NHP encourages these.

Respondent: Active Norfolk

I wanted to confirm that I'd reviewed the Design Code and really pleased to see reference to Active Design and there's a clear acknowledgement of good design positively impacting on lifestyles. As I suspected, nothing additional to add/comment.

Respondent: K. Newnham

I have read your hard copy of the supplementary planning document June 2023 and would like to make comment on the content.

Firstly, may I say what an excellent and helpful document you have collated for the layman, parish councils and developers. Is it possible to obtain a copy of your other report 'Habitat Regulations Assessment (HRA) Screening Report and a Strategic Environmental Assessment (SEA) Screening Report for the SPD'? As a Norfolk Wildlife Trust member for many years, I would like to know what regulations and assessment aid our wildlife flora and fauna.

I note on page 4 of your Design Code draft 1.2 that you intend to adopt the Supplementary Planning Document supporting the adopted local plan. Whilst mostly this is a 'good thing' I object to paragraphs numbers 2 and 3 where the design code will have precedence over neighbourhood plans. At present the neighbourhood plan has priority should there be a conflict, this should remain in place. These plans have been carefully put together by villages to try and protect the attractive informal villages from being 'vandalised' by developers. If the design code removes this neighbourhood plan precedence, then you will be reversing the formal adoption you gave to the neighbourhoods concerned. Stop moving the 'goal posts' to suit yourselves! What are the potential reforms of the planning system? Is it the Government's reduction in protection of pollution to our waterways which will release land to developers currently not able to be built on for pollution reasons? Developers obviously have friends in high places – I hope the wildlife trusts, National Trust, RSPB, etc. fight this change, this area is particularly affected – nature already has to deal with mankind's chemicals, plastics, domestic pollution. Using natural products, i.e., lemon, vinegar etc. and the excellent Ecover range would help reduce pollution considerably, and yes, I use Ecover, lemon, vinegar, etc. I do not do 'chemicals' anywhere. Do you know when these 'reforms' of the planning system will occur?

With regard to the maps on pages 11, 12, and 13, maps from 1797, 1888 and 1949, it would be useful to actually be able to see them properly. Even with a magnifying glass it is impossible – surely with today's technology these maps could have been enhanced.

Page 14's map is legible.

Page 22's pictures of successful SuDS is surely the way forward for residential developments to go. Your intent for more trees and hedges instead of close boarded fences for boundary treatments is appreciated and I see that you are now encouraging more natural friendly requirements from developers.

With regard to building styles, a number of your examples are awful. It appears our developers should look to the Netherlands (page 38 middle left) and just maintain a more traditional style of house building instead of these carbuncles – Eddington, page 38 Great Kneighton, page 48 – Goldsmith Street, page 56 Silchester Estate etc. They look dreadful as new; can you imagine what they will look like in 30 years' time? As for flat roof homes, have they not learnt lessons from past mistakes?

I will generalise now on cycle/dustbin stores and carparking. It is a mistake to reduce parking for vehicles because you will create a 'park anywhere' situation. I saw this first hand on visiting family at Christmas. New homes, narrow roads (emergency access not possible if cars parked on the roads) strips of land supposed to be gardens, not able to take a car, so residents parked partly on the garden strip and the pavement and on a bit of the road. Households have more than one car these

days so they park outside of the new housing estate on the local roads, so residents of those homes cannot park. However well-meant attempting to change car habits to cycles and buses will take time, and meanwhile you will have chaos and dangerous parking. Perhaps you need one allocated parking space outside the house (not all residents are healthy and mobile) and several smaller areas for additional parking (unallocated) to cover visitors and other family members. Cars of three/four/five vehicles per household appears to be quite normal now. With regard to cycle/bin storage (page 39), figure 24 showing the example of the Edinburgh cycle store is excellent. Not so the combined refuse and cycle store. Who would want to store a bike next to a rubbish bin – unhygienic and unpleasant.

Page 78 states UPVC windows, doors, fascias and cladding are not acceptable, I am curious to know what they use now? And who needs that awful cladding anyway.

Page 103 Historic village centres and non-conservation villages (Scratby, Ormesby St Michael, Filby, Mautby, Fritton, etc.). You state development proposals are limited to small infill and on-plot replacement dwellings, extensions, and upgrades to improve energy efficiency. Why then do we see the council looking at 41 homes (down from 67 in 2020) at Scratby (copy of Mercury report dated 8/9/23 attached) and the planning committee recommending councillors approval Badger Homes application! 'Selective planning' I think. Under your intended site selection for 2030-2040 you have swathes of land (fields) within and around the 5-10 historic village centres remit, that you are looking to use for major housing development. These site selections make a mockery of your rules to protect neighbourhoods and residents. If all governments had managed our migration properly, we would not be needing millions of extra homes ruining our countryside. Ukrainian and Afghanistani peoples had great difficulty moving to safety here, in great need of asylum the 'red tape' was horrendous and impossible, whilst access via the English Channel 'no problem'.

Whilst this document is not part of the 2030-2040 site selection, I hope you will remember the 5-10 historic village centres in your future plans. If Caister can come to Filby's doorstep via Nova Scotia Farm, Ormesby St. Margaret can come to Filby's Ormesby Lane fields (up to the chicken house?) and merge with Caister's building projects, whilst going up to and including Scratby I would suggest something is very wrong with your vision for the future of Great Yarmouth and surrounding villages (do remember Caister is a town not a village). You will not be protecting or considering residents wishes if you place the afore mentioned sites into your 'allocated' pot for future development. Developers would be very pleased that you are so accommodating to their needs for future pay days and profits, and for the government you would solve some of the housing crisis. That it would ruin this area for everyone would be 'unfortunate' but the developers and governments housing departments (and that includes whoever wins the next general election) would be very happy.

Page 111 with regard to brick colour, I feel yellow/mellow coloured bricks are much more pleasing to the eye than the red bricks and I would like to see these included in your development acceptability – grey stone colour could also be considered. I also think the apartments on page 84, fig.59 picture are visually acceptable although only to 3 floors not 5.


Finally, just to remind you that this is a farming area producing our food, I enclose a copy of a picture of a vessel loaded with wheat for export/shipment from our outer harbour from the Mercury dated 4/8/23. Record grain exports need fields not major housing developments – Nova Scotia Farm!!!

Appendix 3 – Schedule of Modifications to Final GY Design Code

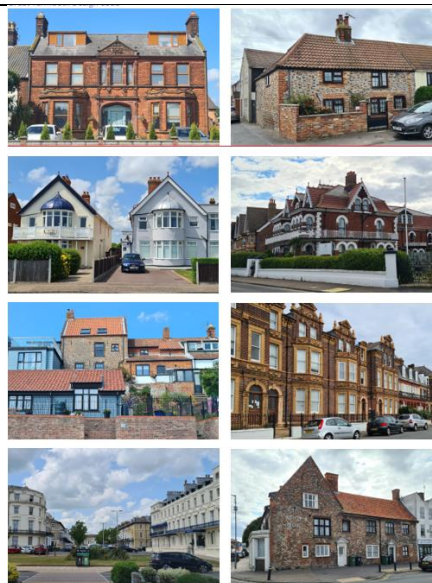
Page of Final (Adopt) Version GY Design Code SPD	Paragraph/ Fig/ Appendix of Final (Adopt) Version of Design Code SPD	Modification/ change suggested by	Modifications/changes made to Final (Adopt) Version of GY Design Code SPD
4.	1.1 Scope and purpose of the Design Code	Internal (GYBC)	<p>Amendments to second paragraphs as:</p> <p>It is a tool to assist in meeting the Strategic Objectives of the Adopted Local Plan¹, which include designing local environments to be high quality and more resilient to a changing climate; and enhancing the quality of the borough's building environment by improving the character of its townscapes and promoting local distinctiveness. <u>The Design Code is intended to inspire higher standards of design across the borough, creating better places for generations to come. It is also intended to ensure more certainty, consistency and speed in the determination of planning applications at all scales, making the planning process more effective at delivering new development that meets the needs of the local area.</u></p>
4.	1.2 Status of the Design Code	K. Newnham,	<p>Amendment to second and third paragraphs as:</p> <p>The Great Yarmouth Design Code is intended for adoption as a Supplementary Planning Document supporting the Adopted Local Plan. In due course, subject to potential reforms of the planning system, the Design Code may be incorporated into the new Local Plan, or be adopted as a Supplementary Plan.</p> <p>When adopted, the Design Code will have <u>has been adopted as a Supplementary Planning Document and has</u> material weight in the assessment of planning applications by the Borough Council as the Local Planning Authority, as well as in appeals. <u>Following the passing of the Levelling Up and Regeneration Action 2023, the Design Code may be incorporated into the new Local Plan, or be adopted as a Supplementary Plan.</u></p>

5.	1.4 Structure of the Design Code	Bourne Leisure (via Lichfields)	<p>Amendments to 'Borough wide design requirements' as:</p> <p>Borough wide design requirements: these summarise design standards that apply across the whole borough area., where relevant to the type of development. These are organised thematically and are aligned to the structure of the National Model Design Code.</p>
5.	1.4 Structure of the Design Code	Broadland Housing Association (via Bidwells)	<p>Amendments made to the 'Required, expected and best practice code elements' as:</p> <p>Some elements of the design code capture mandatory requirements, set out in national, county level or local policy, that all development must comply with.</p> <p>Other code requirements should be met, but are not mandatory as they are subject to discretion and may need to be balanced against other aspects of design. If development proposals do not comply with these code requirements, the onus will be on applicants to demonstrate why compliance is not feasible or appropriate.</p> <p>The code also includes recommendations that are intended to assist applicants in preparing the best possible design proposals. These represent best practice above and beyond mandatory requirements and policy. We hope that applicants will take the opportunity to use these recommendations to improve their proposals, in order to sustain, enhance and improve the distinctive character of Great Yarmouth.</p> <p><u>Within the SPD design requirements are set out for specific types of development proposal. These are categorised as: 'Required'; 'Expected'; and 'Best Practice'. These seek to provide additional detail on how to comply with the policies set out in the Local Plan. They do not introduce new policy, but provide a practical guide to what would be considered to constitute policy compliance.</u></p> <p><u>Applicants will be expected to demonstrate that proposals are designed in compliance with the requirements set out. As the planning system operates on a discretionary basis, a balanced view must be taken by decision-makers about the weight ascribed to each aspect of a proposal and in some cases, applicants may demonstrate that it would be unfeasible, or unviable to be fully policy compliant in every detail, or that betterment can be achieved via a different approach. However, the onus is on applicants to justify their approach in these cases.</u></p> <p><u>All 'required' standards are based on national or local policy requirements. All development should comply with these required standards, unless there are strong planning reasons to justify an alternative approach. These 'required' elements carry the most weight in the assessment of the planning balance.</u></p>

			<u>All ‘expected’ standards are recognised approaches to meeting the expectations of policy. Other ways of demonstrating compliance may be acceptable, but will need to be assessed on a case by case basis.</u>
6.	1.6 How the Design Code has been developed	Internal (GYBC)	<p>Insertion of new section ‘How the Design Code has been developed’ as:</p> <p><u>The Design Code has been developed through extensive consultation and engagement with statutory bodies, stakeholders and representatives of the local community, and in line with the National Model Design Code and National Design Guide. It follows the approach set out in national guidance to be locally specific and relevant in terms of the level of analysis and the focus of the Design Code.</u></p> <p><u>A steering group including representatives from Norfolk County Council including Highways, the LLFA, and tree officers, along with Great Yarmouth Borough Council planning and conservation officers, and Historic England, have guided the process. The content of the design code reflects the input of these stakeholders and represents agreed approaches to designing high quality buildings, streets, spaces and developments of all kinds.</u></p> <p><u>Engagement at the drafting stage took place with parish and ward councillors, applicants and agents from the development sector, the Great Yarmouth Civic Society, and other stakeholders including Natural England, the Environment Agency, and Active Norfolk. Full public and statutory consultation took place on the draft Design Code in 2023, following which amendments were made in response to comments received.</u></p>
7.	2.1 Landscape character, coastal change and flood risk	Broads Authority	<p>Amendments to the second paragraph as:</p> <p>The borough includes a number of important landscape and green infrastructure designations. Aside from the Broads National Park area, for which the Broads Authority is the LPA, these include:</p>
8.	2.2 Historic development	Internal (GYBC)	<p>Amendments to second and third paragraph as:</p> <p>Great Yarmouth, as the main town in the borough, developed in three distinct areas - the medieval town - for a short period, a more prosperous mercantile centre than Norwich - within the walls, the 19th century expansion as a seaside resort coupled with its continuing importance for fishing and fish processing, and the 20th century expansion with estate housing development after WW1 and continuing after WW2 and to the present day. <u>Great Yarmouth Market is one of the largest historic market-places in Britain; a market is presumed to have existed at Great Yarmouth long before the granting of King John’s charter of 18 March 1207-1208.</u></p> <p><u>Until the 19th century, building was only permitted within the Medieval town walls. The limited space dictated that houses were built as closely together as possible, which led to the development of The</u></p>

			<p><u>Rows. Unique to Great Yarmouth, the Rows were a network of 145 very narrow streets which ran parallel to each other. They were so narrow that a special 'Troll Cart' was developed to transport goods along them. The Rows took up most of the land inside the town walls. At first both rich and poor people lived there together.</u></p> <p><u>The wealthier people gradually moved out, and their houses were divided up into smaller properties. This left a diverse range of architecture. Grand merchant houses stood next to tiny dwellings which were built back-to-back with the houses in the next row.</u></p>
8.	Figure 1	Internal (GYBC)	<p>Insertion of new Figure 1 as:</p>  <p><u>Fig. 1. Faden's map of 1797, showing the historic pattern of Rows and Plains inside the medieval walls of Great Yarmouth. The map can be further explored at http://www.fadensmapofnorfolk.co.uk/</u></p>
9-10.	2.3 Local building materials	Internal (GYBC); Historic England	<p>Amendments to third, fourth, fifth and sixth paragraphs as:</p> <p>Painted brick, and render, is not as common <u>commonly seen today</u> as exposed brick or flint, <u>due in part to the erosion of historic lime renders</u>, but is was relatively frequently used. <u>Historically, many brick and/or flint buildings would have been rendered - unless decorative flint or brickwork was meant to be exposed - to protect the rubble core of the flint walls as well as the soft Norfolk brick.</u></p> <p>In many locations the choice of paint as a finish was determined by weathering characteristics, with black tar paint on north- or west-facing elevations due to the prevailing wind exposure and risk of damp, or</p>

			<p>seaward elevations in coastal locations, as a protective coating. South- and street-facing elevations were typically paint <u>limewashed</u> in white or in other colours <u>which were determined through locally available natural pigments</u></p> <p>Timber weatherboarding is <u>can be</u> found in rural areas, <u>particularly on agricultural buildings</u>, but is relatively infrequently <u>infrequent</u>, and is <u>has since the 19th century been</u> typically painted black <u>with tar</u> for improved weathering in the same way as the painting of brick buildings, with <u>limewash</u> - <u>both</u> white or other colours and <u>coloured</u> - on less exposed elevations. Pantiled roofs - which have a Dutch origin - are typical for vernacular buildings, in both red and black <u>glazed</u> forms, while <u>reed</u> thatch was highly prevalent historically, due to the Broads reedbeds, but was largely replaced with hard roof coverings during the 19th and 20th centuries. Plain tile also found, and slate became common after the coming of the railways meant that importing Welsh slate became economic.</p>
10.	2.4 Heritage designations and assets	Internal (GYBC); Historic England	<p>Amendments to first, second and third paragraphs as: The borough includes a wide range of heritage assets, many of national significance. <u>The borough includes 431 listed buildings, 9 are considered to be at risk, 14 Scheduled Ancient Monuments and 18 Conservation Areas. These heritage assets can be enhanced by development within their settings, but can also be harmed by inappropriate design.</u></p> <p>These are highlighted, where relevant, in character area descriptions and the relevant guidance and information should be consulted, including the Conservation Area Appraisal, for Conservation Areas, and <u>such as</u> the Historic England listing entry, for listed buildings, scheduled ancient monuments and historic parks and gardens.</p> <p>Conservation Area Appraisals <u>are in the process of being prepared</u> for the borough are currently unavailable online but can be obtained on request from the <u>borough's Conservation Team</u> Areas. When published and/or adopted, these should also be considered as part of the informing process for future planning applications within those specific areas.</p>
12.	Figure 3	Historic England	<p>Insertion of photographic examples of building materials and details for the Great Yarmouth area as Figure 3:</p>

			
13.	Figure 4	K. Newnham	Amendment to Figure 4 annotation as: Fig. 4. 1797 Faden map, current boundary of Great Yarmouth borough indicated in red. <u>The map can be further explored at http://www.fadensmapofnorfolk.co.uk/</u>
14.	Figure 5	K. Newnham	Amendment to Figure 5 annotation as: Fig. 5. Ordnance Survey map from 1888. <u>This map can be further explored via the National Library of Scotland website, https://maps.nls.uk/</u>
15.	Figure 6	K. Newnham	Amendment to Figure 6 annotation as: Fig. 6. Ordnance Survey map from 1949. <u>This map can be further explored via the National Library of Scotland website, https://maps.nls.uk/</u>
17.	3.1 Design Vision	NCC Public Health	Amendment to fourth bullet point as: <ul style="list-style-type: none"> Be designed for the lifestyles, technology and needs of the present and the future, <u>including supporting health and wellbeing</u>, while complementing the heritage and landscapes of the borough.
18.	4.1 Addressing climate change and conserving resources	Internal (GYBC)	Amendments to first paragraph as: Climate change is the biggest challenge we face and it is a strategic priority that <u>for</u> all development proposals to <u>address this</u> challenge through mitigation and adaptation.

18.	CC1: Ensure walking, cycling and public transport are the natural modes of travel for all users	Broadland Housing Association (via Bidwells)	<p>Amendments to 'Expected' criteria as: Minimise the walking distance from front doors to public transport nodes <u>through site layouts that incorporate direct walking routes.</u></p> <p>Ensure all development is <u>as accessible as possible</u> by public transport, <u>by clustering development around existing or proposed public transport routes and increasing the density of development around public transport nodes.</u></p>
20.	Figure 9	Broads Authority	<p>Amendments to Figure 9 annotation as: Summer sun angle – <u>overhangs and awnings exclude direct sunlight and associated heat gains</u></p> <p>Winter sun angle – <u>Retractable awnings can be raised in winter to allow solar heat gain.</u></p> <p>Amendment to fourth paragraph of Figure 9 annotation as: Floor-to-ceiling glazing on south-facing elevations contributes little to daylighting internal spaces, but increases. <u>It can cause light pollution issues, and increase</u> overheating unless shaded from direct sun. Raising sills makes overheating less likely.</p>
21.	CC3: Integrate on-site renewable energy generation and low and zero carbon heating, cooling and ventilation systems	Broadland Housing Association (via Bidwells), Internal (GYBC)	<p>Amendments to 'Expected' criterion as: Use air source or ground source heat pumps to provide heating.</p> <p>Amendments to 'Best Practice' criterion as: <u>Use air source or ground source heat pumps to provide heating where practicable.</u></p> <p>No gas connections should be provided to new development</p> <p>Use mechanical ventilation with heat reclaim (MVHR) ventilation systems. and do not provide active cooling (air conditioning).</p>
21.	Using passive design and low-carbon technology (dialogue box)	Internal (GYBC)	<p>Amendment to fourth and sixth paragraphs as:</p> <p>Heating uses far more energy than lighting and small power, so reducing carbon emissions from heating is very important. Using gas for heating directly emits greenhouse gas emissions and should not be used.</p> <p>The UK's electricity network is rapidly becoming entirely low-carbon, so using electricity to heat buildings does not involve high carbon emissions. Direct electric heating (such as electric panel heaters) is expensive</p>

			to run, but air-source or ground- source heat pumps are energy-efficient so should be used as the heat source <u>where practicable</u> . Solar thermal panels (which are different from PV panels, which only generate electricity) are also an effective way to provide zero-carbon hot water and heating.
22.	CC4: Minimise potable water use	Broadland Housing Association (via Bidwells)	<p>Amendments to ‘Expected’ criterion as: Integrate rainwater harvesting and greywater reuse to reduce potable water use <u>in non-residential developments.</u></p> <p>Amendments to ‘Best Practice’ criterion as: <u>Integrate rainwater harvesting and greywater reuse to reduce potable water use for residential developments.</u></p>
22.	CC5: Reduce embodied carbon emissions resulting from construction	Broadland Housing Association (via Bidwells); McCarthy & Stone (via Planning Bureau)	<p>Amendments to ‘Expected’ criterion as: Retain and reuse existing structures where this is the most carbon efficient option and the structure contributes, or can be suitably adapted, to the positive character of the local area.</p> <p>Amendments to ‘Best Practice’ criterion as: <u>Retain and reuse existing structures where this is the most carbon efficient option and the structure contributes, or can be suitably adapted, to the positive character of the local area.</u></p>
23.	CC6: Ensure development is flood safe and flood resilient	Broadland Housing Association (via Bidwells); Lead Local Flood Authority	<p>Amendments to ‘Expected’ criterion as: Use salt tolerant materials and construction below the flood datum, in areas at risk of tidal flooding. <u>Comply with LLFA guidance for flood safety and resilience.</u></p> <p>Include new ‘Best Practice’ criterion as: <u>Use salt tolerant materials and construction below the flood datum, in areas at risk of tidal flooding.</u></p>
23.	CC7: Reduce the risk of surface water flooding on and around the site	Lead Local Flood Authority; Anglian Water; Hemsby Parish Council	<p>Delete ‘Required’ criteria as: Meet surface water run-off rates required by the Lead Local Flood Authority (LLFA). Submit detailed design drawings of all proposed SuDS features to demonstrate compliance with the principles and standards set out in the CIRIA SuDS Manual.</p> <p>Amendments to ‘Expected’ criteria as: <u>Apply the LLFA’s Developer Guidance appropriately to all developments for surface water management.</u></p> <p><u>Meet surface water run-off rates required by the Lead Local Flood Authority (LLFA).</u></p>

			<p><u>Submit detailed design drawings of all proposed SuDS features to demonstrate compliance with the principles and standards set out in the CIRIA SuDS Manual.</u></p> <p>Design SuDS to be multifunctional, for example as wildlife habitats, for formal or informal recreation, for parking, and/or supporting <u>to support</u> community educational learning, and/or for rainwater/stormwater harvesting and reuse.</p> <p>Avoid fences around SuDS features such as ponds and watercourses, <u>through design of gradients and depths, and use of natural planting as a barrier.</u></p>
25.	CC8: Reduce urban heat island effect	Broadland Housing Association (via Bidwells)	<p>Delete 'Expected' criterions as: Minimise hard landscaping and maximise soft landscaping, including water surfaces.</p> <p>Shade hard landscaped spaces, streets and paths through tree planting and/or awnings and other adjustable shading devices.</p> <p>Use insulating and heat reflecting materials for both buildings and landscapes, including for roofs. These can include green and brown roofs and light coloured materials.</p> <p>Include new 'Best Practice' criterions as: <u>Minimise hard landscaping and maximise soft landscaping, including water surfaces.</u></p> <p><u>Shade hard landscaped spaces, streets and paths through tree planting and/or awnings and other adjustable shading devices.</u></p> <p><u>Use insulating and heat reflecting materials for both buildings and landscapes, including for roofs. These can include green and brown roofs and light coloured materials.</u></p>
25.	CC9: Minimise resource usage through future building maintenance, alterations and adaptation	Broadland Housing Association (via Bidwells)	<p>Delete 'Expected' criterions as: Use materials that can be reused and recycled at end of life</p> <p>Design to minimise energy intensive maintenance requirements over the lifetime of the development.</p> <p>Design buildings to be adaptable to different uses without requiring demolition.</p>

			<p>Design short-life systems and materials—for example mechanical and electrical installations—to be replaceable without requiring substantial alterations to long-life building elements, such as structure and external envelope.</p> <p>Include new ‘Best Practice’ criteria as: <u>Use materials that can be reused and recycled at end of life</u></p> <p><u>Design to minimise energy intensive maintenance requirements over the lifetime of the development.</u></p> <p><u>Design buildings to be adaptable to different uses without requiring demolition.</u></p> <p><u>Design short-life systems and materials—for example mechanical and electrical installations—to be replaceable without requiring substantial alterations to long-life building elements, such as structure and external envelope.</u></p>
25.	Reducing the urban heat island effect (new dialogue box)	Broadland Housing Association (via Bidwells)	<p>Insertion of new dialogue box ‘Reducing the urban heat island effect’ as:</p> <p><u>Reducing the urban heat island effect</u> <u>The urban heat island effect occurs when hard landscaping, a lack of shading, and dark coloured materials absorb heat from the sun and increase temperatures in the area. A recent study showed that the Kilburn and South Hampstead area in London, with 38% vegetation cover, experienced heat over 7°C hotter than Regent’s Park with 89% vegetation cover, just a short distance away.¹</u> <u>Urban heat is a particular problem at night, due to materials like concrete and stone absorbing heat in the day then slowly releasing it at night. This prevents urban areas cooling down, intensifying heatwaves, and can cause stress and health issues and acutely impacts vulnerable citizens – including children and the elderly.</u></p> <p><u>Vegetation cover and albedo are two of the most important factors which determine the strength of the urban heat island effect. Albedo describes how reflective a surface is. High albedo surfaces, such as white roofs, are reflective and absorb less heat than low albedo surfaces such as asphalt roads. Vegetation cools the air around it through the evaporation of water.</u></p>

			<p><u>Spaces that are designed to maximise vegetation, shade and high albedo surfaces, can reduce the urban heat island effect and make built-up areas more comfortable, as well as reducing energy use on cooling internal spaces, and encouraging people to walk and cycle during hot weather.</u></p> <p><u>1 Arup, Urban Heat Island Snapshot, 2023 - https://www.arup.com/perspectives/publications/research/section/urban-heat-snapshot</u></p>
26.	Useful Resources	Lead Local Flood Authority; Natural England	<p>Amendment to Useful Resources as:</p> <ul style="list-style-type: none"> • Norfolk County Council are preparing a SuDS adoptions guidance manual. When finalised, the Design Code will be updated to include a reference. • <u>Natural England guidance - Introduction to Freshwater Wetlands for Improving Water Quality - JP044 (https://publications.naturalengland.org.uk/)</u> • <u>Norfolk County Council, as the LLFA, have guidance for developers at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers</u>
27.	CI1: Design with regard to local context, including the surrounding built environment, topography, landscape and drainage.	Anglian Water	<p>Amendment to 'Expected' criterion as:</p> <p>Analyse the site context with regard to development form and pattern, landscape <u>topography and character</u>, heritage assets, green and blue spaces, <u>underlying soils and geology</u>, views to and from the site, and locally prevalent materials and building details, and submit analysis within Design & Access Statement.</p>
29.	CI3: Create a positive and distinctive sense of place for new development	Lead Local Flood Authority; Persimmon Homes	<p>Amendment to 'Expected' criteria as:</p> <p>Include distinctive, beautiful and unique features within major development. Features may include landmark buildings, high quality public art, public realm and landscaping, <u>including SuDS.</u></p> <p>Create a range of character areas within large-scale housing developments which comprise significant extensions to existing settlements (such as those allocated by Policies CS18, GN1 and CA1) to achieve a clear design identity for each street or cluster. This <u>should also be addressed at outline application stage as part of a masterplanned approach, and</u> can be achieved through the use of different approaches to layout, house designs, or variation in materials and details.</p>
29.	Figure 14	Internal (GYBC)	<p>Amendment to first annotation under Figure 14:</p> <p>Examples of large sites with clearly defined character to different parts of the development, achieved through careful masterplanning. <u>Both developments show a legible and well-connected street layout using a broadly gridded arrangement.</u></p>

			<p>Deletion of fourth annotation under Fig 14: Both developments show a legible and well-connected street layout using a broadly gridded arrangement.</p>
30.	CI4: Use external materials and detailing which complement the local context and are appropriate for the local climate	Badger Building	<p>Amendment to 'Expected' criterion as: Alterations and energy efficiency improvements should not obscure high quality existing external materials such as brick and flint work. Replacement windows, balcony metalwork and similar should be of similar quality as the existing —upVC windows, doors, fascias and cladding are not generally acceptable material.</p>
32.	SM1: Create a walkable and integrated network of streets and pedestrian/cycle routes.	Sport England	<p>Amendment to 'Expected' criterion as: Use site layouts to link existing streets, paths and cycle routes in the wider area, and to create new cycling and walking routes that connect local destinations <u>and encourage active travel.</u></p>
33.	SM2: Design movement routes to clear and consistent standards which prioritise vulnerable users, children, pedestrians and cyclists.	Internal (GYBC)	<p>Amendment to 'Expected' criterion as: <u>Follow the principles of the street design examples in figures 17-23, which show indicative acceptable approaches to new streets within new masterplanned development.</u></p>
42.	SM4: Ensure the amount and design of cycle parking and storage encourages cycling on an everyday basis	Broadland Housing Association; Persimmon Homes; Internal (GYBC)	<p>Amendment to title of design code 'SM4' as: SM4: Ensure the amount and design of cycle parking and storage incentivises encourages cycling on an everyday basis</p> <p>Amendment to 'Required' criterion as: Meet NCC minimum requirements for the amount and design of cycle storage and parking across all forms of development.</p> <p>Amendment to 'Expected' criterion as: Meet <u>For non-residential development, meet NCC minimum requirements for the amount and design of cycle storage and parking.</u></p>

			<p>For residential development, meet the following requirements for cycle storage in order to meet household needs in full, including cycles for children, for sport and leisure, and for visitors.</p> <ul style="list-style-type: none"> For one-bedroom dwellings and HMOs, provide 1 resident cycle space per bedspace, and 1 visitor space per dwelling (which can be uncovered/HMO room. For dwellings of two or more bedrooms, provide 1 resident cycle space per bedroom, plus one additional resident space, and outside of 1 visitor space per dwelling. For example a secure enclosure, three-bedroom dwelling should have 4 resident spaces and 1 visitor space.e.g. a Sheffield stand). For retirement housing, provide 1 secure resident cycle space, and one visitor cycle space, per two bedspaces. Many older people use cycles, and in particular e-bikes, for exercise and leisure. For all residential cycle storage, provide one electric outlet per two cycle spaces to facilitate e-bike charging. Provide adequate secure cycle storage to accommodate at least one cargo bike per dwelling. Cycle storage must be additional to garages counted as an allocated parking space <u>towards vehicle parking standards , unless the garage is large enough to accommodate cycle parking as well as a car.</u> Cycle storage can be within curtilage of dwelling but must be secure and covered e.g. cycle locker; dedicated store/shed; dedicated space within hallway/ secure porch; dedicated space within expanded garage. <u>Visitor spaces can be uncovered and outside of a secure enclosure, e.g. a Sheffield stand.</u> <p><u>Where practicable, locate</u> cycle storage closer to entrance doors, than car parking/ storage.</p> <p>Amendment to Policy links relating to ‘SM4’ as: A2: Housing design principles <u>CS9: Encouraging well-designed, distinctive places</u> <u>I1: Vehicle parking for developments</u></p>
42.	Figure 26	Internal (GYBC)	<p>Deletion of second and third annotation under Figure 26: Left: Secure cycle store in Edinburgh has good visibility, deterring theft.</p> <p>Right: cycle store and refuse store combined in an attractive and durable enclosure as part of front curtilage yard space.</p>

46.	PS1: Integrate existing natural features, including water and trees, in site layouts	Internal (GYBC)	Amendment to Policy links relating to 'PS1' as: <u>A2: Housing design principles</u>
47.	PS2: Provide a sufficient quantity, type, and quality, of public open space and green infrastructure with development	Broadland Housing Association; Persimmon Homes	Amendment to 'Required' criterion as: Quantity of open space provided must comply with Policy H4 - Open Space SPD <u>provision for new housing development - and should refer to the Open Space SPD which contains numerical standards</u> and some guidance on typology design requirements in Appendix 2.
48.	PS4: Improve biodiversity on and around the development site	Lead Local Flood Authority; Broadland Housing Association (via Bidwells);	Delete 'Required' criterion as: Design development to maximize the opportunity of securing at least 10% biodiversity net gain on-site. Amendment to 'Expected' criterion as: Use the location, type and design of open spaces, <u>including SuDS</u> , to improve the connectivity of wildlife habitats in the wider area, including the potential to connect to habitats that may be created through future adjacent development.
49.	PS5: Include street trees along movement routes and as part of public spaces	Sport England; Persimmon Homes;	Amendments to 'Expected' criteria as: Position street trees on median strips, in verges, between parking bays, and/or on pavements of sufficient width <u>so as not to block active travel routes and infrastructure.</u> On sites close up to <u>1km from</u> the sea, plant salt tolerant species such as, <u>but not limited to</u> , Whitebeam or Holm Oak. Hawthorn and Pendunculate <u>Pedunculate</u> Oak are also tolerant of cold exposed sites.

49.	Useful Resources	Norfolk County Council Natural Environment Team; Sport England	<p>Amendments to Useful Resources as:</p> <ul style="list-style-type: none"> • <u>CIRIA BNG Best Practice Guidance Biodiversity Net Gain Principles and Guidance for UK construction and developments (ciria.org)</u> • <u>Natural England Brochure Biodiversity Net Gain; An introduction to the benefits: V2 BNG Brochure (https://naturalengland.blog.gov.uk/wp-content/uploads/sites/183/2022/03/BNG-Brochure_Final_Compressed.pdf)</u> • <u>Active Design Guidance - https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</u>
52.	BF2: Ensure an appropriate sense of enclosure of streets and public spaces, and clear relationships between public and private space	Internal (GYBC)	<p>Amendments to 'Expected' criterion as:</p> <p>Create a visual sense of enclosure with a good relationship between the height and massing of buildings, landscape features (including trees) and the street. In urban settings, local centres and high streets, building heights should be equal or greater than the width of the space between them. In other locations, building heights should be approximately half the width of the space between them. In lower density locations, the scale of street trees should be at least as tall as buildings when mature <u>Example design approaches are shown in figures 17-23 and should be used as reference.</u></p> <p><u>In urban settings, local centres and high streets, the ratio of building heights to street width should be between 1:1 and 1:2. In other locations, the ratio of building heights to street width should be between 1:1 and 1:5. Street trees should be as tall as height of buildings or taller in accordance with the street code example layouts.</u></p>
53.	Figure 34	Persimmon Homes	<p>Amendment to Figure 34 annotation as:</p> <p>Diagrams from National Model Design Code showing recommended <u>suggested</u> ratios of building height to street width for different street types <u>and different neighbourhood types. A site specific approach should be taken to establish the most appropriate enclosure ratio, with reference to area specific code requirements and Streets and Movement section of the design code.</u></p>
58.	BD3: Create functional and accessible new homes with sufficient internal space.	Broadland Housing Association (via Bidwells); Persimmon Homes	<p>Amendments to 'Expected' criterion as:</p> <p>Meet the Nationally Described Space Standards (NDSS) for the internal spaces within dwellings.</p> <p>Meet the M4(2) standard (accessible and adaptable) within Part M of the Building Regulations, for all new homes unless impractical, <u>for example</u> due to site topography or flood risk. For homes within Flood Zone 3, where habitable spaces cannot be provided on the entrance storey, include lift access, or internal staircases which are sized to permit the installation of a stairlift if required, from street level to habitable spaces above the flood datum.</p>

			<p>Amendment to 'Best Practice' criterion as: <u>Meet the Nationally Described Space Standards (NDSS) for the internal spaces within dwellings.</u></p>
59.	BD5: Ensure adequate privacy for habitable rooms (living rooms, dining rooms, kitchens or bedrooms) and private outdoor amenity space	Persimmon Homes	<p>Amendments to 'Expected' criterion as: When rear-facing or side-facing windows into habitable rooms are directly opposite each other, ensure a minimum separation of 25m 20m unless windows are obscured or a fence or other visual barrier of above eye-level height (as viewed from the potential vantage point) is designed in.</p> <p>Where living rooms are located above ground level, rear-facing windows should be a minimum of 35m 30m from rear-facing windows into habitable rooms of any other dwelling.</p>
59.	Figure 40	Persimmon Homes	<p>Amendment to first annotation in relation to Figure 40 as: Minimum 25m 20m between habitable rooms. If upper rooms are living rooms, increase to 35m 30m.</p>
60.	BD6: Provide sufficient quality and quantity of private outdoor amenity space for residential development	McCarthy & Stone (via Planning Bureau); Internal (GYBC)	<p>Amendments to 'Expected' criterion as: Provide external private amenity space that meets the following minimum standards:</p> <p><u>Specialist housing, including older people's housing, is not required to meet these requirements but should demonstrate that adequate good quality, accessible and functional outdoor amenity space is provided for residents.</u></p> <p>Amendment to 'Policy links' relating to 'BD6' as: CS9(i): Encouraging well-designed, distinctive places</p>
61.	BD7: Provide convenient and discreet refuse storage and utilities to meet user requirements.	Internal (GYBC)	<p>Delete 'Required' criterions as: Provide residential refuse storage areas that meet the requirements of the local waste collection service.</p> <p>Demonstrate that commercial development proposals include adequate space for refuse storage and collection.</p> <p>Amendment to 'Expected' criterion as:</p>

			<p><u>Provide residential refuse storage areas that meet the requirements of the local waste collection service.</u></p> <p><u>Demonstrate that commercial development proposals include adequate space for refuse storage and collection.</u></p>
62.	BD9: Use boundary treatments that contribute positively to the character of the public realm and wider landscape.	Hemsby Parish Council	<p>Amendment to 'Expected' criterion as: Ensure natural surveillance to streets and public spaces by limiting boundary treatments to the front of buildings to below 1.2m 1m in height.</p>
62.	BD10: Provide external lighting which minimises light pollution while ensuring safety.	Broads Authority	<p>Amendments to 'Expected' criteria as: Design <u>Where external lighting is required, design</u> lighting, and its controls, to preserve dark skies and avoid excessive light pollution.</p> <p>Provide adequate external lighting to ensure users of buildings and spaces, including more vulnerable user groups, feel safe at night-, <u>without contributing to light pollution.</u></p>
62.	BD11: Design appropriate deterrents to nuisance bird nesting and roosting	Badger Building; Broads Authority	<p>Amendment to title of design code 'BD11' as: Design appropriate deterrents to <u>nuisance</u> bird nesting and roosting</p> <p>Amendments to 'Expected' criteria as: Design roof forms, sills, parapets <u>Consider how building form</u> and other horizontal surfaces to <u>design can</u> deter <u>nuisance</u> bird nesting and roosting, <u>such</u> as far as possible without requiring additional deterrents. Include adequate access to all parts of buildings <u>by seagulls and pigeons, while creating habitat</u> for cleaning and maintenance Include appropriate, visually discreet bird deterrents where necessary <u>threatened species such as swifts, swallows</u> and ensure <u>house martins.</u></p> <p><u>Where</u> deterrents are <u>necessary, ensure they are visually discreet and</u> minimally visible from the public realm.</p>
63.	Useful Resources	Natural England	<p>Amendments to Useful Resources as:</p> <ul style="list-style-type: none"> Institute of Lighting Professionals Guidance Note 1: reducing obtrusive lighting through design (https://theilp.org.uk/category/ilp-guidance-notes/)

66.	5.1 Great Yarmouth, within the town walls	Internal (GYBC)	<p>Amendments to second paragraph as: The area within the medieval town walls of Great Yarmouth is of high historic significance, with a high density of listed buildings surrounded by the Scheduled Ancient Monument of the Town Wall. It includes several Conservation Areas, which are well described by the corresponding Conservation Area Appraisals, as well as site specific Local Plan policies and Supplementary Planning Documents. These should be fully read and referenced in relation to any development proposals at any scale, <u>and including several Conservation Areas.</u></p> <p>Inclusion of new third paragraph as: <u>A number of site specific Local Plan policies and Supplementary Planning Documents are relevant to this character area, and these should be fully read and referenced in relation to any development proposals at any scale.</u></p>
68.	Figure 47	Internal (GYBC)	<p>Amendment to first annotation under Figure 47 as: Top left: South Quay and the waterfront. Currently somewhat dominated by vehicle traffic, this should improve with the opening of the third river crossing. <u>The Georgian waterfront is mainly of brick.</u></p> <p>Amendment to fifth annotation under Figure 47 as: Some well-restored and sensitively infilled streets remain, <u>with new development and adaptation of existing buildings using traditional materials such as brick, pantiles and timber,</u> but car parks disrupt the historic row pattern.</p>
69-70.	5.1 Great Yarmouth, within the town walls – Design Requirements	Historic England; Internal (GYBC)	<p>Amendments to ‘Height and massing’ requirements as: Two storey development is not <u>generally</u> approach for the urban character of the area.</p> <p>Amendments to ‘Street elevation design’ requirements as: New shopfronts <u>shopfront designs</u> should strictly follow the guidance of <u>be in accordance with the</u> Shopfronts Design Guide.</p> <p>Amendment to ‘Building design and materials’ requirements as: External façades should <u>typically</u> be predominantly <u>well-detailed and</u> high quality masonry such as brick, flint or stone <u>or traditional lime render.</u> Timber cladding <u>weatherboarding</u> can be appropriate in small areas. Render should be avoided. Visible <u>More prominent</u> pitched roofs should be slate, good quality plain or pan tiles, zinc <u>or pantiles,</u> or other standing seam <u>metal</u> roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>

			<p>Amendment to 'Landscape design and materials' requirements as: <u>Create public access to the full length of the Town Wall on both sides, where physically feasible, with associated public realm and landscaping which can include active uses (play, outdoor seating, outdoor gym, café seating sport and recreation).</u></p> <p>Amendment to 'Other' requirements as: Create public access to the full length of the Town Wall on both sides, where physically feasible, with associated public realm and landscaping which can include active uses (play, outdoor seating, outdoor gym, café seating sport and recreation).</p>
71.	5.2 Great Yarmouth Seafront	Internal (GYBC)	<p>Amendments to second paragraph as: The seafront character area stretches from Jellicoe Road in the north to Main Cross Road in the south. It includes the buildings and landscapes on both sides of the seafront road (Marine Parade, North Drive) and includes the major tourist destinations of Great Yarmouth as well as the beach itself. Part of the character area is covered by the Seafront Conservation Area and is well described in the Conservation Area Appraisal, and site specific policies in the Local Plan also apply to parts. <u>These should be fully read and referenced in relation to any development proposals at any scale.</u></p> <p>Amendments to first paragraph under 'Marine Parade/South Beach Parade' as: Most of this part of the seafront is well described in lies within the Seafront and Camperdown Conservation Area Appraisals which should be fully considered. The following is a high level summary <u>of the characteristics of the conservation area.</u></p>
74-77.	5.2 Great Yarmouth Seafront – Design Requirements	Historic England	<p>Amendment to 'Height and massing' requirements as: Marine Parade/South Beach Parade (east side): Due to the nature of seafront attractions, height parameters are not appropriate but building heights and massing should be carefully determined <u>through site specific analysis</u> to limit impact on views and setting of heritage assets.</p> <p>Amendment to 'Street elevation design' requirements as: Elevation design could should include ornamental and decorative detailing including bay windows, decorative metalwork to balconies, eaves and verge detailing and shaped timber fascias, <u>while ensuring maintenance is fully considered.</u></p> <p>Amendment to 'Building design and materials' requirements as:</p>

			<p>North Drive: External façades should use good quality typically be appropriately detailed brick, flint, or hung tile. Visible Timber weatherboarding can be appropriate in small areas. More prominent pitched roofs should be slate, good quality plain or pan tiles, zinc or pantiles, or other standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Amendment to 'Other' requirements as: Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals. Enhancing the appearance and setting of the many listed buildings along the seafront must be a priority.</p>
78.	5.3 Gorleston town centre and historic core	Internal (GYBC)	<p>Amendments to second paragraph as: This character area comprises the historic core of Gorleston, including the Conservation Area between the southern length of its High Street and eastern industrial estate. The remaining region of the town centre to the north is within the Gorleston Conservation Area Extensions. Its corresponding Conservation Area Appraisal and Management Plan should be fully read and referenced in relation to any development proposals within the bounds of both the Conservation Area and its proposed extensions.</p>
80-81.	5.3 Gorleston town centre and historic core – Design Requirements	Internal (GYBC)	<p>Amendments to 'Street elevation design' requirements as: New shopfronts shopfront designs should strictly follow the guidance of be in accordance with the Shopfronts Design Guide.</p> <p>Amendments to 'Building design and materials' requirements as: External façades should typically be predominantly well-detailed and high quality masonry such as brick or, flint, or traditional lime render or painted brick in colours drawn from the local palette. Timber cladding weatherboarding can be appropriate in small areas but fibre cement cladding is not appropriate. Visible. More prominent pitched roofs should be slate, good quality plain or pan tiles, zinc or other pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Alterations and energy efficiency improvements should not obscure high quality existing external materials such as brick and flint work. Replacement windows, balcony metalwork and similar should be of similar quality as the existing —UPVC windows, doors, fascias and cladding are not acceptable.</p>
86.	5.5 Great Yarmouth and Gorleston port and industrial areas	National Property Grid	<p>Amendment to third bullet point under 'Areas characteristics' as:</p>

		Holdings (via First Plan)	<ul style="list-style-type: none"> There is a notable contrast between South Quay (historic waterfront) and the industrial development pattern on the other side of the river although they are seen together in the prominent riverfront vistas. <u>The Victorian gasholder is prominent in long views.</u>
88-89.	5.5 Great Yarmouth and Gorleston port and industrial areas – Design Requirements	Internal (GYBC); National Grid Property Holdings (via First Plan)	<p>Amendments to ‘Building design and materials’ requirements as:</p> <p>External façades should <u>typically be predominantly well-detailed and</u> high quality masonry such as brick or, flint, or traditional lime render or painted brick in colours drawn from the local palette. Timber cladding <u>weatherboarding</u> can be appropriate in small areas. Render should be avoided. Visible. <u>More prominent</u> pitched roofs should be slate, good quality plain or pan tiles, zinc or other pantiles, or standing seam <u>metal</u> roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Amendments to ‘Other’ requirements as:</p> <p><u>Views of the Victorian gasholder should be considered and enhanced by the placement and massing of new development.</u></p>
92.	5.6 Caister-on-Sea village centre – Design Requirements	Internal (GYBC)	<p>Amendments to ‘Street elevation design’ requirements as:</p> <p>New shopfronts <u>shopfront designs</u> should strictly follow the guidance of <u>be in accordance with the</u> Shopfronts Design Guide.</p> <p>Amendments to ‘Building design and materials’ requirements as:</p> <p>External façades should <u>typically be well-detailed and</u> high quality masonry such as brick or, flint, traditional lime render or painted brick in colours drawn from the local palette, or timber. <u>Timber</u> weatherboarding. Metal cladding can be appropriate in small areas. Visible <u>More prominent</u> pitched roofs should be slate, good quality plain or pan tiles, zinc or other pantiles, or standing seam <u>metal</u> roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>
97-98.	5.7 Terraced streets and squares – Design Requirements	Historic England; Internal (GYBC)	<p>Amendments to ‘Development pattern’ requirements as:</p> <p><u>Development should reinforce the strong character of this area type and avoid infill development that dilutes the terraced pattern.</u></p> <p>Amendments to ‘Building design and materials’ requirements as:</p> <p>External façades should <u>typically be well-detailed and</u> high quality masonry such as brick or, flint, traditional lime render or painted brick in colours drawn from the local palette, or timber. <u>Timber</u> weatherboarding. Metal cladding can be appropriate in small areas. Visible <u>More prominent</u> pitched roofs should be slate,</p>

			<p>good quality plain or pan tiles, zinc or other pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p> <p>Amendment to ‘Other’ requirements as: Maintain and enhance the character of the Conservation Areas in line with the emerging Conservation Area Appraisals.</p>
100-101.	5.8 Interwar housing estates – Design Requirements	Internal (GYBC)	<p>Amendments to ‘Building design and materials’ requirements as: External façades should use good typically be well-detailed and high quality brick, flint, or hung tile, timber cladding or. Timber weatherboarding or render. Visible may also be appropriate. More prominent pitched roofs should be slate, good quality plain or pan tiles, zinc or other pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>
106.	5.10 Historic village centres	Internal (GYBC)	<p>Amendments to first paragraph as: This area type comprises the historic cores of the rural villages, predominantly made up of organic development up to the early 20th century. Historic village centres are mostly, but not all, covered by conservation area appraisals and these should be consulted where relevant. Some villages lack conservation areas (i.e. except for Scratby, Ormesby St Michael, Filby, Mautby, and Fritton, etc.) but the latter do still have an attractive informal village centres and these fall into this area type.</p>
108-109.	5.10 Historic village centres – Design Requirements	Internal (GYBC)	<p>Amendments to ‘Maximum / minimum densities / plot ratios’ requirements as: Minimum 30 dwellings per hectare.</p> <p><u>Minimum 30dph within historic village centres which fall within Belton, Hemsby, Hopton-on-Sea, Martham, Ormesby St Margaret and Winterton.</u></p> <p><u>Within other historic village centres, residential densities should be a minimum of 20 dph.</u></p> <p>Amendments to ‘Building design and materials’ as: External façades should typically be well-detailed and high quality masonry such as brick or, flint, traditional lime render or painted brick in colours drawn from the local palette, or timber. Timber weatherboarding. Metal cladding can may also be appropriate in small areas. Visible. More prominent pitched roofs should be slate, good quality plain or pan tiles, zinc or other pantiles, or standing seam metal roofing. Other materials can be appropriate if clearly justified by the architectural concept.</p>

			Amendments to 'Other' design requirements as: Maintain and enhance the character of the Conservation Areas in line with the <u>emerging</u> Conservation Area Appraisals.
110.	5.11 Plotlands	Internal (GYBC)	Amendments to first paragraph as: Great Yarmouth includes a number of 'plotland' developments which originally grew up on marginal land in mostly seafront locations. Many are now threatened by coastal <u>erosion and/or sea level rise but some remain well-loved and distinctive neighbourhoods with</u> erosion and/or sea level rise but some remain well-loved and distinctive neighbourhoods with an unusual pattern and character. Some plotland areas now lie within coastal change management areas. Development proposals within this area type are typically small-scale infill development, on-plot replacement dwellings, extensions and alterations.
111-112.	5.11 Plotlands – Design Requirements	Internal (GYBC)	Amendments to 'Other' requirements as: Maintain and enhance the character of the Conservation Areas in line with the <u>emerging</u> Conservation Area Appraisals.
113-114.	6.1 New housing developments	Persimmon Homes; Sport England	Amendments to first bullet point under 'Relationship to landscape' as: <ul style="list-style-type: none"> New housing developments are highly visible in the landscape. Layout and design should ensure they form a positive backdrop to views and in particular that boundary treatments to the edge of developments have a rural character. Fronting new development onto access lanes around the perimeter of the site is not typical <u>and Fronting new development onto the landscape is not typical in rural settings and it is preferable for rear gardens to form the boundary to the rural landscape around the development. The use of close boarded fencing on to the landscape should be avoided, instead natural boundary treatments should be used. Walking and cycling routes should provide permeability to the landscape beyond as well as views out from the development to the rural landscape.</u> it is preferable for rear gardens to form the while walking and cycling routes should provide permeability to the landscape beyond as well as views out from development to the rural landscape. Amendment to first bullet point under 'Phasing' as: <ul style="list-style-type: none"> Phased development should ensure that green infrastructure and functional walking and cycling routes are built as early as possible in order to build in active lifestyles <u>and encourage active travel</u> for new residents from the start.
117.	6.3 New industrial, commercial and retail development	Broads Authority	Amendments to first paragraph as:

			<p>Industrial, commercial and retail development fulfils important functions but, in out-of-town locations can fulfil important functions but rarely contributes <u>in particular, frequently fails to contribute</u> positively to the character of the local area.</p> <p>Amendments to third bullet point under 'Landscape design' as:</p> <ul style="list-style-type: none"> • External <u>Where external</u> lighting <u>is required</u>, this should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.
118.	6.4 Development in the rural area	Broads Authority	<p>Amendments to second bullet point under 'Landscape design' as:</p> <ul style="list-style-type: none"> • External <u>Where external</u> lighting <u>is required</u>, this should be very carefully designed to limit light pollution while ensuring a safe and attractive environment at night.
119.	6.5 Holiday Parks	Bourne Leisure (via Lichfields)	<p>Amendments to second paragraph as:</p> <p>The borough-wide requirements of the Design Code apply equally to holiday park development, <u>where relevant based on siting and context</u>, and the following points capture some of the priorities in terms of masterplanning and integration with context.</p> <p>Amendments to first bullet point under 'Landscape setting' as:</p> <ul style="list-style-type: none"> • Mitigate opportunities for <u>Minimise</u> recreational disturbance to natural wildlife/landscape locations through the design of the movement network/connection to green spaces as well as provision of suitable alternative natural green spaces for recreation. <p>Amendments to second bullet point under 'Landscape setting' as:</p> <ul style="list-style-type: none"> • Ensure boundary treatments create a positive and attractive frontage to streets and to the countryside. Close boarded fencing is not appropriate- <u>for boundary treatments visible from the surrounding countryside or the public realm</u>. Static caravans and lodges must be well-screened from public view points and the view from neighbouring homes and rights of way should be enhanced by extensive on-site landscaping
	Throughout		Typographical and grammatical corrections made throughout the document.

Great Yarmouth Borough-Wide Design Code

SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Habitat Regulations Assessment (HRA) Screening Report

January 2024



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1. Introduction

- 1.1 The Conservation of Habitats and Species Regulations 2017 provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) also states that Ramsar sites should be afforded the same level of protection as the European sites.
- 1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).
- 1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states: *‘Where a land use plan: (a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) Is not directly connected with or necessary to the management of the site, the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives.’*
- 1.4 The HRA is therefore undertaken in stages and should conclude whether or not a plan would adversely affect the integrity of any sites.
- 1.5 The first stage is to assess whether a plan is likely to have a significant effect on a designated site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle and cannot take into account mitigatory measures. If a likely significant effect is identified, an appropriate assessment of those likely effects is then necessary.
- 1.6 This report comprises the first stage of the Habitat Regulations Assessment for the Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) and screens whether the document is likely to result in a significant effect on the integrity of designated sites.
- 1.7 The Great Yarmouth Borough-Wide Design Code SPD is a tool to help shape placemaking in the borough and will apply to all scales and forms of development within the borough (aside from areas which the Broads Authority is the Local Planning Authority), including householder applications, small sites, major developments, and regeneration sites. The SPD does not establish the principle of development across the borough but supplements the implementation of relevant design-based policies¹ in the Local Plan Part 1 Core Strategy (Adopted 2015) and Local Plan Part 2 (Adopted 2021) which have already been subject to Habitats Regulations Assessment.
- 1.8 The Screening Report has been subject to consultation alongside the draft SPD. Natural England supported the conclusions of the screening report and its findings. No other comments were made on the report.

¹ These include policies CS1, CS4, CS9, CS10, CS11, CS12, CS13, CS16, CS17, CS18, GSP6, GSP7, GY2, GY3, GY4, GY5, GY6, GY7, GY10, A1, A2, H3, H4, H8, H9, H10, H11, B1, L1, L2, E4, E5, E6, E7 and I1.

2. Protected sites covered by this report

- 2.1 The protected sites considered in this report includes all the sites considered within the Habitat Regulations Assessment for the Local Plan Part 1 Core Strategy and Local Plan Part 2. This used a starting point of looking at sites within a 20km buffer of the Borough Council's administrative boundary. The following sites within this buffer area were discounted, due to distance and a lack of an impact pathway:
- Haisborough, Hammond and Winterton SAC (marine)
 - Paston Great Barn SAC
 - Outer Thames Estuary SPA (marine)
 - Benacre to Easton Bawents SAC/SPA
- 2.2 Given that this Supplementary Planning Document seeks to support the implementation of the Local Plan Part 1 Core Strategy and Local Plan Part 2 it is considered appropriate to exclude the above sites from this assessment too.
- 2.3 Therefore, the designated sites considered by this screening assessment are as follows:
- Winterton-Horsey Dunes SAC
 - North Denes SPA
 - Breydon Water SPA/Ramsar site
 - Broadland SPA/Ramsar site
 - The Broads SAC
- 2.4 Appendix 2 sets out more detail about the sites above including their interest features, condition and threats.

3. Other Plans and Projects

- 3.1 Regulation 105 of the 2017 Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 3.2 The purpose of the Great Yarmouth Borough-Wide Design Code (SPD) is to help implement the design-based policies of the Local Plan Part 1 Core Strategy and Local Plan Part 2. Regulations dictate that a SPD must not conflict with the development plan. The Supplementary Planning Document does not diverge from the design principles set out in the Local Plan Part 1 Core Strategy or Local Plan Part 2 but provides additional detail to aid their implementation.
- 3.3 The Local Plan Part 1 Core Strategy and Local Plan Part 2 was subject to a Habitat Regulations Assessment which concluded there would be likely significant effects on the above sites as a result of increased recreational impact associated with new development. To mitigate this, the assessment recommended the preparation and implementation a mitigation and monitoring strategy. This has now been implemented. The strategy involves all new residential and tourist development making a financial contribution towards the mitigation proposals detailed in the strategy.

4. Assessment of likely significant effects

- 4.1 The table below considers each section of the guidance in the Great Yarmouth Borough-Wide Design Code Supplementary Planning Document for potential likely significant effects on the above-mentioned designated sites.

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Introduction	This section provides introductory context only.	None	None	No
About Great Yarmouth Context	This section provides contextual information only.	None	None	No
Design vision for Great Yarmouth	This section consolidates a design vision for the design code which is consistent with achieving both natural and built environment objectives of the Local Plan Part 1 Core Strategy and Local Plan Part 2.	None	None	No
Borough-wide design requirements – Addressing climate change and conserving resources	This sub-section builds upon local plan policies CS1, CS9, CS12, CS13, CS16, A2 and E7. It provides detailed design guidance to help address climate change through design principles, mitigation and adaptation. No impact is considered likely.	None	None	No
Borough-wide design requirements – Context and identity	This sub-section builds upon local plan policies CS9, CS10, A2 and E5. It provides detailed design guidance to ensure developments respond to local context and strengthens local distinctiveness, setting out site analysis principles to guide an appropriate design response for development. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Borough-wide design requirements – Streets, movement and parking	This sub-section builds upon local plan policies CS9, GSP7, A2, and I1. It provides detailed design guidance for developments to prioritise the needs of walking and cycling whilst minimising the impact of necessary vehicle movement. No impact is considered likely.	None	None	No
Borough-wide design requirements – Public open space, nature and water	This sub-section builds upon local plan policies CS11, GSP6, A2, H4, and E4. It provides detailed design guidance to encourage development to provide good quality access to open space, nature and water and encourage on-site biodiversity. The guidance does not undermine the need for developments to undertake Habitat Regulation Assessment where appropriate. No impact is considered likely.	None	None	No
Borough-wide design requirements – Built form	This sub-section builds upon local plan policies CS1, CS9, A1, A2, and H3. It provides detailed design guidance to encourage sites to be developed effectively and in scale with its surroundings. No impact is considered likely.	None	None	No
Borough-wide design requirements – Building design	This sub-section builds upon local plan policies CS4, CS9, A1, A2 and E6. It provides detailed design guidance for specific buildings, predominantly focused on their visual appearance and function. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Area specific design requirements – Great Yarmouth, within the town walls	This sub-section provides guidance to aid the design of new development with the Great Yarmouth town centre area. It does not establish the principle of development, this being established through existing local plan policies and specifically policies GY1, GY2, GY3, GY4 and GY5. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	None
Area specific design requirements – Great Yarmouth seafront	This sub-section provides guidance to aid the design of new development within the Great Yarmouth seafront area. It does not establish the principle of development; this being established through existing local plan policies and specifically policies GY6 and GY7. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area specific design requirements – Gorleston town centre and historic core	This sub-section provides guidance to aid the design of new development within the Gorleston town centre area. It does not establish the principle of development; this being established through existing local plan policies and specifically policy R3. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Area specific design requirements – Gorleston seafront	This sub-section provides guidance to aid the design of new development within the Gorleston seafront area. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area specific design requirements – Great Yarmouth and Gorleston port and industrial areas	This sub-section provides guidance to aid the design of new development within the Great Yarmouth and Gorleston port and industrial areas. It does not establish the principle of development; this being established through existing local plan policies specifically policy GY10. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area specific design requirements – Caister-on-Sea village centre	This sub-section provides guidance to aid the design of new development within the Caister-on-Sea village centre. It does not establish the principle of development; this being established through existing local plan policies specifically policy R4. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Area type requirements – Terraced streets and squares	This sub-section provides guidance to aid the design of new development within the borough's terraced streets and squares areas. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area type requirements – Interwar housing estates	This sub-section provides guidance to aid the design of new development within the borough's existing interwar housing estates. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area type requirements – Post-war housing estates	This sub-section provides guidance to aid the design of new development within the borough's existing post-war housing estates. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
Area type requirements – Historic village centres	This sub-section provides guidance to aid the design of new development within the borough's existing historic villages. It does not establish the principle of development; this being established through existing local plan policies and specifically policy R5. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Area type requirements – Plotlands	This sub-section provides guidance to aid the design of new development within the borough's existing plotland areas. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Design requirements by development type – New housing developments	This sub-section provides detailed design guidance for new developments permitted within the borough. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Design requirements by	This sub-section provides detailed design guidance for infill development /	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
development type – Infill development/ redevelopment	redevelopment permitted within the borough. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.			
Design requirements by development type – New industrial, commercial and retail development	This sub-section provides detailed design guidance for new industrial, commercial and retail development permitted within the borough. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Design requirements by development type – Development in the rural area	This sub-section provides detailed design guidance for development in the rural area of the borough. It does not establish the principle of development; this being established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.	None	None	No
Design requirements by development type – Holiday parks	This sub-section provides detailed design guidance for holiday park development in the borough. It does not establish the principle of development; this being	None	None	No

Section of SPD	Assessment of potential impact on designated sites	Designated sites which could possibly be affected	Likely significant effect identified	AA needed?
	established through existing local plan policies. The guidance therefore expands on existing adopted policy and does not, in itself, promote additional development. No impact is considered likely.			

5. Conclusions

- 5.1 The Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) sets out flexible and practical guidance to help shape placemaking across the borough. The SPD does not promote or support new development in addition or different to that which is already supported through existing policies in the Local Plan Part 1 Core Strategy and Local Plan Part 2. Rather, it provides detailed design guidance on how development should come forward in terms of layout, design, protection and enhancement of the natural, built and historic environment, and improving the health and well-being of communities. As such no likely significant effects on internationally designated habitat sites are considered to arise from the SPD as drafted alone or in combination with any other plans or strategies. The SPD has therefore been ‘screened out’ and no appropriate assessment is required.

Appendix 1: Sources of background information

Great Yarmouth Consolidated Local Plan (Local Plan Part 1 Core Strategy – Adopted 2015, Local Plan Part 2 – Adopted 2021) -

<https://storymaps.arcgis.com/stories/fa64b44d16b74a6b9173280f373c4b80>

Appendix 2: Designated Sites Considered

The table below provides details on the designated sites considered as part of this screening assessment. The table is adapted from the Habitats Regulations Assessment of the Great Yarmouth Local Plan Part 2 (Footprint Ecology, 2020).

Site	Reason for designation, trends in key species (where known)	Condition	Threats and Reasons for adverse condition	Notes / other issues
The Broads SAC, Broadlands SPA/Ramsar	Hard oligo-mesotrophic waters with Charophytes, natural eutrophic lakes with <i>Magnopotamium</i> or <i>Hydrocharition</i> type vegetation, transition mires and quaking bogs, calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caracion daravallianae</i> , alkaline fens and alluvial forests with <i>Alnus glutinosus</i> and <i>Fraxinus excelsior</i> , <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils. Desmoulin's whorl snail <i>Vertigo moulinsiana</i> , otter <i>Lutra lutra</i> and fen orchid <i>Liparis loeselii</i> . Breeding bittern and marsh harrier (both increasing), wintering hen harrier, Bewick's and whooper swan (no trends available) and wigeon (stable) shoveler (declining) and gadwall (stable).		Management neglect and succession, water abstraction, drainage, sea level rise and saline incursions. Sewage discharges and agricultural runoff. Tourism and recreation	Calcareous fens in support Annex II fen orchid <i>Liparis loeselii</i>
Relevant component SSSIs				
Burgh Common & Muckfleet Marshes	Floristically-rich fen meadows, tall fen vegetation and drainage dykes.	22 % favourable; 29 % unfavourable recovering; 49 % unfavourable no change.	Water pollution - agriculture/run off	Likely to be affected by upstream abstraction issues.
Hall Farm Fen, Hemsby	Floristically rich unimproved fen grassland with dykes unusual in supporting both acidic and calcareous plant communities.	100 % unfavourable no change.	Water abstraction.	Water abstraction likely to be affecting this site.
Trinity Broads	Shallow, inter-connected lakes with fringing reedswamp, wet carr woodland and fen.	29 % favourable; 36 % unfavourable recovering; 36 % unfavourable no change.	Inappropriate scrub control. Water abstraction. Water pollution - agriculture/run off. Water pollution – discharge.	
Shallam Dyke Marshes, Thurne	Grazing marsh and clearwater drainage dykes.	1 % favourable; 3 % unfavourable recovering; 79 % unfavourable no change; 17 % unfavourable declining.	Drainage, Inland flood defence works, Water pollution - agriculture/run off	

Site	Reason for designation, trends in key species (where known)	Condition	Threats and Reasons for adverse condition	Notes / other issues
Upper Thurne Broads & Marshes	Open water and marginal reedswamp, species rich mixed and <i>Cladium</i> fen, base-poor seepage community, grazing marsh, alder carr. Marsh harrier and bittern	40 % favourable; 2 % unfavourable recovering; 47 % unfavourable no change; 11 % unfavourable declining.	Water pollution - agriculture/run off. Drainage. Inappropriate css/esa prescription. Agriculture – other. Siltation.	
Winterton-Horsey Dunes SAC, Great Yarmouth North Denes SPA	Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>), Humid dune slacks, Embryonic shifting dunes, Shifting dunes along shoreline with <i>Ammophila arenaria</i> . Breeding little tern (variable numbers between years).		Declines in management, water abstraction, land drainage, scrub encroachment.	
Relevant component SSSIs				
Great Yarmouth North Denes	Full successional sequence of vegetation from pioneer to mature types; foredune, mobile dune, semi-fixed dune and dry acid dune grassland, accreting ness (promontory) Largest UK breeding colony of little tern on the foreshore.	100 % favourable.		
Winterton-Horsey Dunes	An extensive dune supporting well developed dune heath, slacks and dune grassland. Little terns breed on the foreshore.	30 % favourable; 56 % unfavourable recovering; 14 % unfavourable no change.	Inappropriate coastal management	
Breydon Water SPA/Ramsar	Breeding common tern <i>Sterna hirundo</i> (no trends available), wintering Bewick's swan (declining), avocet <i>Recurvirostra avosetta</i> (stable) and golden plover <i>Pluvialis apricaria</i> (stable), ruff <i>Philomachus pugnax</i> , wintering Lapwing <i>Vanellus vanellus</i> (SPA) (stable). At least 20,000 wintering waterfowl		Sea-level rise, recreational disturbance	
Relevant component SSSIs				
Breydon Water	The only intertidal flats occurring on the east coast of Norfolk attracting large numbers of wildfowl and waders on passage and during the winter months.	100 % favourable.		
Halvergate Marshes	Halvergate Marshes support wintering waterfowl including Bewick's swan, lapwing and golden plover.	32 % favourable; 44 % unfavourable recovering; 24 % unfavourable no change.	Inappropriate weed control. Inappropriate css/esa prescription. Inappropriate cutting/mowing. Water abstraction.	

Site	Reason for designation, trends in key species (where known)	Condition	Threats and Reasons for adverse condition	Notes / other issues
			Inappropriate ditch management	

Great Yarmouth Borough-Wide Design Code

SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Strategic Environmental Assessment (SEA)

Screening Report

July 2024



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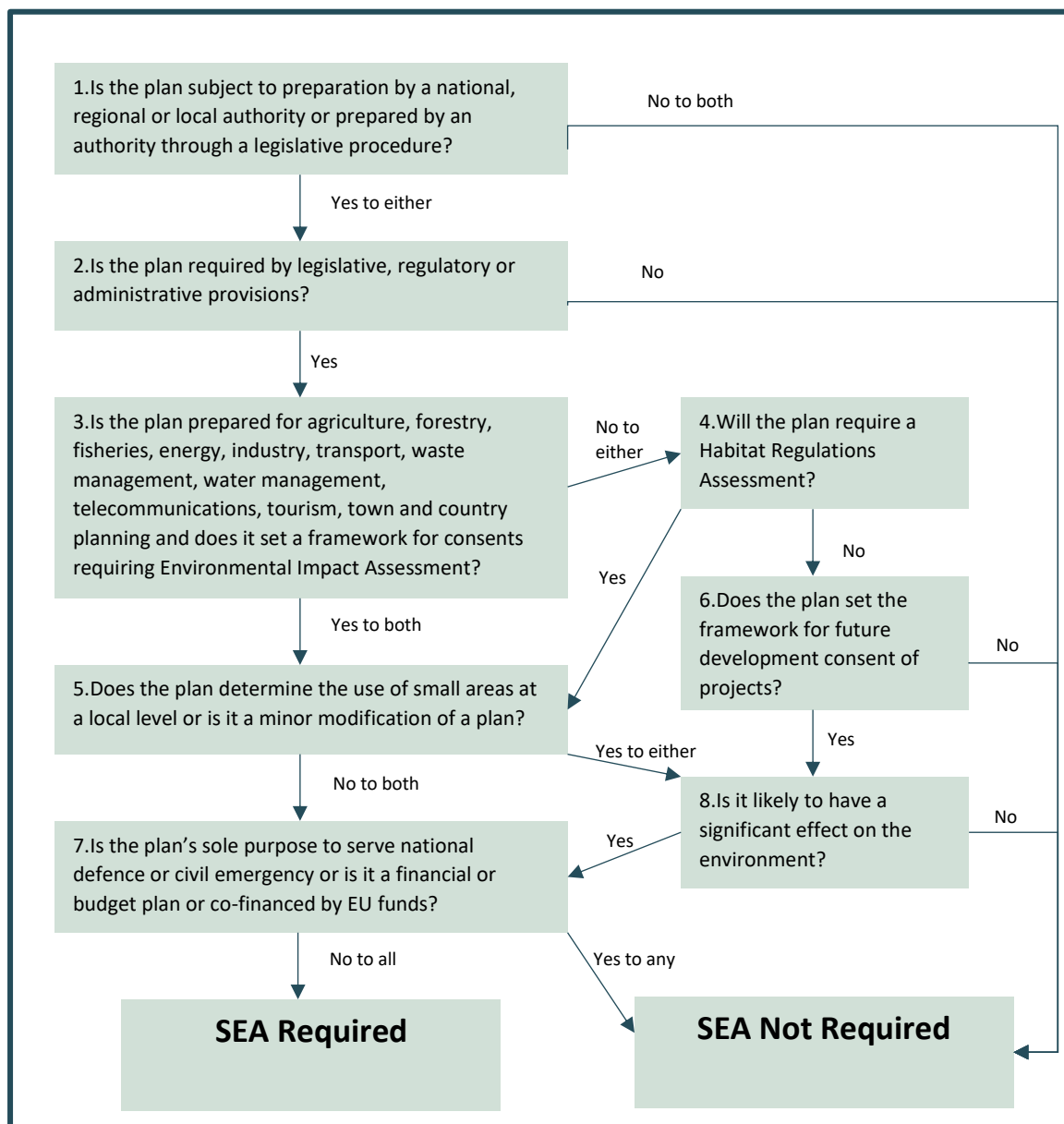
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1. Introduction

- 1.1 The Environmental Assessment of Plans and Programmes Regulations (2004) requires plans (including Supplementary Planning Documents) which are likely to have an effect on the environment to be subject to a Strategic Environmental Assessment (SEA).
- 1.2 In some circumstances a Supplementary Planning Document (SPD) could have significant environmental effects and may fall within the scope of the regulations and so require Strategic Environmental Assessment.
- 1.3 This screening report is designed to test whether or not the contents of the Great Yarmouth Borough-Wide Design Code SPD requires a full Strategic Environmental Assessment. The Screening Report was subject to consultation alongside the final draft SPD. Natural England supported the conclusions of the screening report and its findings. No other comments were made on the report.
- 1.4 The screening assessment is presented in two parts. The first part assesses whether the SPD constitutes a 'plan or programme' that requires SEA under the Regulations (see Figure 1). The second part of the assessment considers whether the SPD is likely to have a significant effect upon the environment (Stage 8, in Figure 1), using criteria drawn from Schedule 1 of the Regulations. Schedule 1 of the Regulations sets out the following criterion for considering likely significant effects:
 1. The characteristics of plans and programmes, having regard, in particular, to:
 - a. the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
 - b. the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
 - c. the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
 - d. environmental problems relevant to the plan or programme; and
 - e. the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).
 2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—
 - a. the probability, duration, frequency and reversibility of the effects;
 - b. the cumulative nature of the effects;
 - c. the transboundary nature of the effects;
 - d. the risks to human health or the environment (for example, due to accidents);
 - e. the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
 - f. the value and vulnerability of the area likely to be affected due to—
 - i. special natural characteristics or cultural heritage;
 - ii. exceeded environmental quality standards or limit values; or
 - iii. intensive land-use; and

- g. the effects on areas or landscapes which have a recognised national, Community or international protection status.

Figure 1 - Application of SEA to plans



2. Screening Assessment

- 2.1 Table 1 below outlines the responses to the questions posed in Figure 1 in relation to the Great Yarmouth Borough-Wide Design Code SPD.

Table 1 - SEA Criterion Screening

SEA Criterion	Yes/No	Explanation
1. Is the SPD subject to preparation and/or adoption by a national, regional or local authority	Yes	The preparation and adoption of the SPD is undertaken by the Council as the local planning authority, in accordance with the

SEA Criterion	Yes/No	Explanation
<p>OR</p> <p>prepared by an authority for adoption through a legislative procedure by Parliament or Government?</p> <p>(Article 2(a))</p>		<p>Town and Country Planning (Local Planning) Regulations 2012.</p> <p>GO TO STAGE 2</p>
<p>2. Is the SPD required by legislative, regulatory or administrative provisions?</p> <p>(Article 2(a))</p>	Yes	<p>The SPD is not a requirement and is optional under the provisions of the Town and Country Planning Act and the regulations. However, if adopted its guidance will supplement and help implement Local Plan policies.</p> <p>GO TO STAGE 3</p>
<p>3. Is the SPD prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use</p> <p>AND</p> <p>does it set a framework for future development consent of projects in Annexes I and II of the EIA Directive?</p> <p>(Article 3.2 (a))</p>	<p>Yes</p> <p>No</p>	<p>The SPD has been prepared for the purposes of town and country planning. It supports the Great Yarmouth Local Plan and will be a material consideration in the determination of relevant planning applications.</p> <p>The SPD only provides detailed design guidance to help support and implement the Strategic Objectives of the Local Plan where this concerns achieving high quality design. This includes supporting the implementation of policies CS1, CS4, CS9, CS10, CS11, CS12, CS13, CS16, CS17, CS18 of the Local Plan Part 1 (Core Strategy) and policies GSP6, GSP7, GY1, GY2, GY3, GY4, GY5, GY6, GY7, GY10, A1, A2, H3, H4, H8, H9, H10, H11, B1, L1, L2, E4, E5, E6, E7, I1 of the Local Plan Part 2.</p> <p>The Local Plan provides the main framework for future development consent of project which may require Environmental Impact Assessment.</p> <p>GO TO STAGE 4</p>
<p>4. Will the SPD, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?</p> <p>(Article 3 (2)(b))</p>	No	<p>This has been screened separately. See the Habitat Regulations Assessment (HRA) Screening Report of the SPD.</p> <p>GO TO STAGE 6</p>

SEA Criterion	Yes/No	Explanation
5. Does the SPD determine the use of small areas at local level OR is it a minor modification of a plan or programme (Article 3 (3))	N/A	N/A
6. Does the SPD set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Article 3(4))	N/A	The SPD will be a material consideration in the determination of planning applications for development within the local planning authority area. GO TO STAGE 8
7. Is the SPDs sole purpose to serve national defence or civil emergency OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7 OR Is it a financial or budget PP? (Article 3.8-3.9)	N/A	N/A
8. Is the SPD likely to have a significant effect on the environment? (Article(3.5))	No	See the following section summarising the reasoning / justification for this decision.
Conclusion The Regulations do not require a SEA for the Great Yarmouth Borough-Wide Design Code SPD.		

- 2.2 Table 2 below assesses the likelihood of significant effects arising from the SPD as per criterion 8 above.

Criteria for determining Likely Significant Effect (Schedule 1)	Assessment
1. The characteristics of plans and programmes, having regard, in particular, to:	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>The SPD, once adopted, would be a material consideration in the determination of planning applications for development within the local planning authority area of Great Yarmouth.</p> <p>The overarching design framework is set by the Local Plan, and as such will provide the direct</p>

	detail for future development. The SPD does not allocate resources, but helps to guide the design of local developments that are localised in nature with the promotion of healthy environments.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The SPD conforms with the NPPF, NPPG, and provides more detailed guidance in relation to the design policies in the Great Yarmouth Local Plan Core Strategy and LPP2. Whilst there are other SPDs that cover other localised design guidance, this SPD is intended to sit alongside and complement them. Therefore, it will not significantly influence other plans or programmes.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The SPD encourages enhancement and preservation of the environment, with an emphasis on green infrastructure, addressing climate change and use of efficient energy and materials. It also strongly encourages sustainable place development in line with the NPPF to prevent needless waste and increase sustainable patterns of movement. The SPD therefore supports sustainable development.
(d) environmental problems relevant to the plan or programme;	One of borough's key environmental problems is flood risk, which the SPD helps to address by encouraging sustainable development for future flood resilience and to help implement SUDs into developments. The SPD also considers the future impact of climate change and promotes more sustainable patterns of movements across the borough, reducing increases in carbon and greenhouse gas emissions.
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	No impact. The SPD is not directly relevant to the implementation of European legislation.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
(a) the probability, duration, frequency and reversibility of the effects;	The SPD aims to encourage high quality design development. Development will therefore be expected to follow the Design Code to be appropriately designed, considering impacts on amenity, character, environment, heritage etc. This will result in positive effects across the built and natural environment.
(b) the cumulative nature of the effects;	The SPD conforms to related strategic policies and it is intended that the effects will have a positive cumulative benefit for the borough.

(c) the transboundary nature of the effects;	No impacts. No transboundary effects (i.e. no other EU Member States) are anticipated.
(d) the risks to human health or the environment (for example, due to accidents);	It is not considered that the SPD would present a risk to human health. The SPD is expected to have a positive impact by promoting and maintaining green infrastructure, place attachment, wellbeing and increasing adaptation to climate change.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The magnitude and spatial extent of any effects is not expected to be significant because of the localised nature. The effects of the SPD will be at the borough-wide scale and lower.
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use.	Sites are assessed against relevant local plan policies. The SPD will not set policy related to specific land use and will not influence the principle of development, but instead will be a guide to developers for infrastructure and design techniques. This includes preserving cultural heritage.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	The SPD will help to harmonise new development where these potentially interface with the Broads Executive Area.

3. Conclusions

- 3.1 The Great Yarmouth Borough-Wide Design Code Supplementary Planning Document (SPD) is in accordance with the Council's Local Plan Core Strategy and LPP2 which have been subject to a full Strategic Environmental Assessment. The SPD sets out flexible and practical guidance to help shape placemaking across the borough. The design code has potential to provide multiple benefits such as encouraging the preservation and enhancement of the built and natural environments, as well as improving the health and well-being of communities.
- 3.2 Given the above the SPD will not have any significant effects on the environment and therefore a full Strategic Environmental Assessment is not required.

URN: 22-264
Subject: The Star Hotel
Report to: Cabinet 29th January 2024
Report by: James Wilson – Head of Environment and Sustainability
Phil Turner – Property Enabling Officer
Sue Bolan – Enabling & Empty Homes Officer



SUBJECT MATTER

The Star Hotel has been vacant for several years and has been the target of anti-social behaviour and vandalism. The building is listed and occupies a prime position on the Historic Quay. It has been widely understood that there are complex legal issues relating to the ownership of the building.

Whilst a wider decision will be required over the Council's future actions surrounding the Star Hotel, this paper provides details of the costs to make the building secure and watertight, whilst an options paper for the future of the building is developed.

The activity will slow down the degradation of the building, protecting this historic asset and prevent further vandalism.

Recommendations

That Cabinet:

- 1. Note the work carried out to date.**
- 2. Agree to progress works to secure the building and make it water-tight. This includes an allocation of £81,000 to undertake these works in default.**

1.0 INTRODUCTION

- 1.1** The Star Hotel is a Grade II listed building on Hall Quay in Great Yarmouth, originally built in the 1700's ("the Property"). It was a popular hotel and has been used by local businesses and tourists for accommodation, meetings and social events. In January 2020 it was sold.
- 1.2** The new owner from January 2020 sold individual rooms of the Property on a leasehold basis. Information provided by the leaseholders indicates that the purchase price would include contribution towards renovation works to the property with leaseholders receiving an income from the letting of the room. These works were never carried out, and the property has been empty ever since.

2.0 ACTIONS TO DATE

2.1 Antisocial Behaviour Response

The first report of ASB was on 24th September 2021. Following this there have been numerous minor and major incidents which have involved, Council officers, police and fire colleagues, an indication of the work involved is detailed below:

- Rough sleeping and collection of items to the rear of the property, including human waste and drug paraphernalia.
- Break in at the property and fire started, leading to multiagency response and serious damage to the property through two floors.
- Report of young person being held against their will, police attended, and all left safely.
- Report of county lines gangs intimidating individuals
- Property being stripped of all bedroom and kitchen fittings.
- Reports of gangs in the property and offensive weapons found.

GYBC has made temporary attempts to secure the building, several times. The property Enabling Officer visits the property twice a week and the rough sleeping team monitor the property daily. This ensures all issues are captured and dealt with promptly. Whilst effective, this is a resource burden on the Council and more permanent means of securing the building are required to reduce the level of intervention needed.

2.2 Property Ownership

The Property was purchased in January 2020 by The Star GY Limited, now dissolved. There are 42 leaseholders registered on the title with a 43rd pending registration. The Property was then transferred to 36644 Ltd a Maltese registered company in 2021 (the two companies share the same director). As part of the sales process, the leaseholders were provided assurances that the renovation works would be covered as part of the purchase price. Once renovations were completed, leaseholders expected an income from the rental of the room as part of the Hotel.

The current owner is registered in Malta this brings additional complications with action against the Property and particularly the securing of any charges to the Property.

3.0 Proposals

- 3.1 It is proposed that the Council carry out enough of the works listed in the urgent work notice to secure and make the Property watertight as detailed in 4.2. Legal advice has been sought, as we are not proposing to complete all works in the notice. Our responsibility in carrying out urgent works in default is to complete enough works to stop the Property from deteriorating further and ensure its preservation for the future, while not causing excessive or unnecessary costs to be incurred. Securing it from entry and the roof from water ingress will meet this requirement while not incurring excessive costs for the Owner or the Council.

The Council could do nothing, especially where it is considered financially unviable for the Council to be involved. However, this would continue to be a drain on the Council's resources as the anti-social behaviour will continue and it could see the property deteriorate to the point of requiring demolition and at risk of destruction from fire or water damage.

- 3.2 Once the property is secure a longer-term plan for its future is required.

4 FINANCIAL IMPLICATIONS

4.1 Costs incurred to date

Works have been carried out at the Property since September 2021. These have been against clearing and securing and under emergency powers. As of 16th October 2023, works have been carried out to the value of £21,660 to prevent further access and antisocial behaviour. This amount is not secured.

4.2 Costs to Secure

Legal advice has been sought, regarding level of works in default which should be carried under the Urgent Works Notice. Whereas the Owner would be expected to complete all the work, works in default should be only those necessary to prevent further deterioration and not cause additional cost to the Owner.

Therefore, it is proposed that the works carried out in default are limited to.

Roof works

1. Provide safe scaffolding access to allow for inspection and remedial repairs to the roof to make wind and weather tight and free from collapse.
2. Allow for a structural engineer to inspect damaged areas of roof and provide report with specification for remedial repair.
3. Subject to the outcome of a structural engineer's report allow for the replacement of damaged, deteriorated or rotten roof members (rafters, purlins). These should be replaced in a like for like manner.
4. Carefully lift existing slates around damaged area and set aside for reuse. Allow for perished and missing slates to be replaced with new slates to match existing in size, dimension, colour, and texture.
5. Remove battens to the damaged area of roof and cut back to sound battens. Replace damaged battens with treated timber battens matching the dimensions of the existing. New battens should be fixed by screws and following the existing gauge.
6. Relay slates in a like-for-like manner replicating the original means of fixing. Ensure that the roof is watertight.
7. Secure the building.
8. Allow temporary boarding and metal shutters to carefully secure ground floor windows, doors and all means of access (whilst avoiding any damage to the listed fabric) to prevent unauthorised access and further damage.

It is estimated that works to this level will cost in the region of £80,000.

4.3 Legal costs

It is expected that the works in default and adhering a cost to the Property may not be prohibitive.

Should the Council decide to take further action then this would be subject to a further report detailing any further legal cost based on the action proposed.

5 RISK IMPLICATIONS

- 5.1 There are numerous risks associated with this property. Those known at this stage are captured below but these could be added to as time progresses.
- 5.2 The costs accrued so far are not secured against the property at present. Ongoing works to secure the Property, under emergency powers, will need to be accrued to ensure the Property is kept safe. Legal colleagues and officers are trying to establish whether these costs can be secured until this is confirmed, these costs are at the Council's expense.
- 5.3 Despite the appropriate notices having been served, works in default of the Urgent Works Notice, if approved, would be difficult, costly and would take a long time to be secured as a charging order against the property, as it is owned by a Maltese company.
- 5.6 If illegal access to the property continues, there are several risks to the property itself. Water ingress is deteriorating the interior and without this being rectified will cause irrevocable damage to the fabric of the property, this will also make the structure of the property unsafe internally, creating a risk of injury through collapsing floors / ceilings.
- 5.7 The fire service has stated that, due to the amount of damage to the property, they no longer know how it would act in a fire and therefore will attend a fire but will not enter the property unless there is a risk to life. The police have stated the same, the risk to their officers due to the condition of the Property means they will not attend unless there is a risk to life.
- 5.8 Risk to the lives of those entering the property. The Council is aware that people are gaining access to the property to deal and take drugs. On visiting the premises there is also evidence of people protecting their rooms and belongings in a violent manner evidenced by signs and weapons found. It is important to note that at present the property is secure and no one is believed to be in the property, however it continues to be constantly monitored to ensure it remains this way. Should access be gained to the level it was previously, there is serious concern for the safety of those involved, especially with the reluctance of emergency personnel to enter the property.
- 5.9 An Asbestos survey has been carried out at the property; a risk assessment is in place with PPE instructions for those going in. However, despite signs being erected to this affect, people gaining access illegally are risking their own health.
- 5.10 Should officers be required to enter the property to check for occupants following a break in. It is important to note that due to the asbestos present in the property, an appropriate asbestos cleaning / decontamination unit should be created for those exiting the property, followed by appropriate disposal of contaminated articles. This will cause additional costs which would be at the Council's expense.
- 5.11 The property continues to take up a lot of Council resources, both in officer time and financially. Not doing something with the property will continue to see a drain on these resources, to secure the Property and address anti-social behaviour.
- 5.12 Reputational risk to the Council. Should the Council choose not to act to ensure the preservation of the property, alongside the property falling into further disrepair, the reputation of the Council will be at risk for not taking action to protect the property which is a high profile listed building and

addressing the anti-social behaviour occurring at the Property. Equally spending an exorbitant amount of taxpayer's money to rectify this issue could be seen as reputation risk also.

6 LEGAL IMPLICATIONS

- 6.1 NP Law are working closely with officers on this project. All points are being discussed before action is taken and appropriate authority will be sought before action is taken.
- 6.2 Counsel has been appointed to assist with establishing the current status and the Urgent Works Notice and to establish if the leases are valid.

7 BACKGROUND DOCUMENTS

Town & Country Planning Act 1990

Local Government (Miscellaneous Provisions) Act 1982

Planning & Compulsory Purchase Act 2004

Empty Homes Policy – Housing & Neighbourhoods Committee – 6th December 2018

Acquisition and Disposal Policy – February 2021

Homelessness Update and Temporary Accommodation Acquisition - Housing & Neighbourhoods Committee – 10th November 2022

Area for consideration	Comment
Monitoring Officer Consultation:	Through ELT
Section 151 Officer Consultation:	Through ELT
Existing Council Policies:	Empty Homes Policy Acquisition and Disposal Policy
Financial Implications (including VAT and tax):	Section 4
Legal Implications (including human rights):	Section 6
Risk Implications:	Section 5
Equality Issues / EQIA assessment:	After an initial consideration there are no known protected characteristics for the Leaseholders or Owner. If protected characteristics become apparent an assessment will be carried out prior to further action.
Crime & Disorder:	Section 2
Every Child Matters:	No

CABINET

URN: 23-069

Report Title: HRA Service Charge Review Update

Report to: ELT

13 December 2023

Cabinet

29 January 2024

Responsible Cabinet Member: Cllr Graham Plant

Responsible Director/Officer: Nicola Turner, Head of Housing Assets

Is this a Key decision? Yes

Date added to Forward Plan of Key Decisions if a Key Decision: 17 July 2023



EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

This report outlines a proposed revised approach to charging Council Tenants and Leaseholders for services provided to their homes. Currently tenants pay the same charge for caretaking services despite a range of service levels being delivered in different locations. In addition, there are services which are provided to some homes but not all for which no service charge is currently charged and this report proposes de-pooling these charges to allow new service charges to be introduced.

Cabinet previously approved a consultation of tenants and leaseholders on introducing the above changes and this report details the outcome of that consultation and recommends that the new approach is introduced from April 2024.

RECOMMENDATIONS:

That Cabinet:

- 1) Approve the new approach to charging tenants for services provided through the Housing Revenue Account as set out in the report.
- 2) Approve the new approach to charging leaseholders for services provided through the Housing Revenue Account, subject to no material objections being received during the next two stages of consultation.
- 3) Note that the actual costs of service charges will be set as part of the 2024/25 Housing Revenue account budget.

1. Introduction

- 1.1 The Council provides a range of caretaking and gardening services that support the management and provision of a clean, safe environment for residents accessing communal areas adjacent to the Council's social housing homes. Service charges to tenant/leaseholders should fully cover the cost of providing these services, however this is not currently the case as not all services provided are funded by a service charge.
- 1.2 In September 2023, Cabinet considered a report which set out a new approach to charging for the provision of services to Council tenants and leaseholders which would result in the Council de-pooling the cost of a number of services which are provided to some but not all tenants but for which there is not currently a service charge paid. As the cost of these services is not currently recovered via a service charge, the cost of these services is met from the Housing Revenue Account rental income meaning all tenants pay for these services irrespective of whether they receive the service or not. The report also proposed a new approach which would mean the introduction of different charges to reflect the different level of services provided. Overall, the new approach is designed to increase transparency and fairness so that tenants and leaseholders pay specific service charges for the services they receive and the charge reflects the level of service they receive. This will also allow tenants and leaseholders to hold the Council to account for the cost and quality of services provided.
- 1.3 The report approved by Cabinet, recommended that a consultation was undertaken of all tenants and leaseholders to seek their views on the proposed changes to allow Cabinet to make a final decision as to whether or not the approach to service charges would be changed. Following Cabinet's approval of the report and the consultation, a letter and questionnaire was sent to all Council tenants to seek their views on the proposed changes. A separate questionnaire was sent to leaseholders as they currently pay for garden maintenance services and so there was no requirement to consult them on the introduction of such a charge. Copies of the questionnaires are attached at Appendix A. Whilst a paper questionnaire was sent, there was also the opportunity to complete the survey online. The consultation ran from Friday 6 October 2023 to 11.59pm on Sunday 5 November 2023. This report provides details of the outcome of the consultation and seeks Cabinet approval of the next steps.

2 Consultation Results

- 2.1 A total of 855 responses were received to the survey. This included 790 (13.85% response rate) tenant responses and 65 (17.95% response rate) leaseholder responses. 10.38% of surveys were completed online. Whilst 855 completed survey forms were received, not all tenants or leaseholders completed all questions.
- 2.2 The headline results are shown below, with detailed results for each question shown at Appendix B.

Tenant and leaseholder consultation results:

Question	% Of respondents who agree/consider it fairer
Do you agree with the principle that tenants and leaseholders who receive a more frequent service such as caretaking or grounds maintenance should pay more than those tenants who receive a less frequent service?	60.91%
Do you agree with the proposal to change the caretaking charge so there are different service charges to reflect how often the caretakers visit and clean an area or how often the grounds maintenance service cut the grass/tidy communal areas?	62.23%
Do you think having different costs for services to reflect the frequency of that service will be fairer than all tenants/leaseholders paying the same charge?	66.51

Tenant consultation results (reflecting additional questions only asked of tenants)

Question	% Of respondents who agree/consider it fairer
Do you agree with the principle that only those tenants who receive a service should pay for that service? For example, should only tenants who have communal areas pay for the grounds maintenance of those areas, rather than this cost being paid out of the rent of all council homes?	66.63%
Do you agree with the proposal to introduce service charges for the tenants who receive that service, so it is no longer part of the rent (de-pooling)? For example, introducing charges for tenants who live in flats and have communal lighting or charging for grounds maintenance of communal areas.	52.07%
Do you think showing service charges separately from rent is fairer than what we currently do?	64.01%

- 2.3 The Survey of Tenants and Residents (STAR survey) carried out in December 2022 and January 2023 showed that some tenants and leaseholders had made comments that the Council does not collect grass cuttings when the grass on the Council's housing estates is cut. The survey therefore asked an additional question, to see whether there was support in principle to increase the grounds maintenance service charge to cover the costs of grass collection. Of all those that answered this question, only 25.33% of respondents

supported an increased charge, 52.08% did not support an increased charge and 22.59% did not know. It is therefore not proposed to enhance the specification of the grounds maintenance contract to include grass collection and the cost of grounds maintenance will continue to be on the basis of cutting of grass areas only.

2.4 Analysis of the survey has shown that there was a difference in views depending on the type and tenure of home occupied by respondents:

- Leaseholders had a greater tendency to support the principles and proposals than tenants
- Sheltered tenants tended to be less supportive than tenants as a whole across all questions
- Tenants with a communal areas / shared space are less in agreement across all questions
- Where respondents said they had no communal area, they were more supportive of the proposals
- Tenants living in flats were more in agreement across all questions with tenants in houses less likely to agree.

3.0 Next Steps

3.1 Overall, 52% of tenants support the proposed approach of de-pooling. 62% of tenants and leaseholders agreed with the proposal to introduce differential charges to reflect different levels of service provision and 67% thought this would be fairer. On this basis, it is proposed that the Council will de-pool those areas of services which are provided to some tenants and not all and introduce differential levels of service charges to reflect the different levels of service. The earliest these changes could be made are from 1 April 2024, although some service charges may not be able to be introduced before April 2025. This will see the following new service charges being introduced for tenants:

- Grounds maintenance charge to include differential charges to reflect different levels of grounds maintenance service
- TV aerial (properties not on current TV aerial contract and service charge)
- Communal lighting
- Blinds and other furnishing (Jubilee Court and future new build homes only reflecting what is provided and maintained by the Council)
- Road and estate maintenance charge (rates will be differential reflecting contractual cost of maintenance charges to the Council)

In addition the Enhanced Tenancy Management Charge for sheltered homes will be renamed the Sheltered Housing Management Fee to aid transparency on what this service charge relates to.

The existing Caretaker Basic and Caretaker Enhanced service charges will be replaced with new Internal Caretaking and External Caretaking charges with differential rates to reflect the frequency of the service.

The following new charges will be introduced for leaseholders:

- Road and estate maintenance charge (rates will be differential reflecting contractual cost of maintenance charge to the Council)
- 3.2 As part of the development of the Housing Revenue Account budget for 2024/5, the Council will review the costs of all services it provides through service charges. The new service charges costs will be approved as part of the approval of the 2024/5 Housing Revenue Account budget.
 - 3.3 Tenants will be notified of the new service charge amounts through their statutory rent increase notification. In accordance with legislative requirements, leaseholders require three stages of consultation before the changes can be introduced with effect from April 2024. The initial consultation letter and questionnaire started this process, with a second letter required to be sent following Cabinet and the final letter sent in February 2024. All consultation responses will be considered before the final decision is made to implement the changes set out in this report.
 - 3.4 Following consideration by Cabinet of this report, tenants who purchase their home through the Right to Buy scheme and purchase a freehold house or bungalow which benefits from communal area will be charged an annual grounds maintenance fee, with the charge reflecting the applicable rate for a tenanted property.

4.0 Financial Implications

- 4.1 De-pooling service charges and introducing differential rates for service charges to reflect different levels of service provision will have minimal impact upon the Housing Revenue Account in the medium term. Service charges must reflect the cost of provision and are therefore charged on a cost recovery basis, although the cost charged to leaseholders includes an element to reflect the management costs associated with delivering the services and the costs of the leasehold service. It is however, noted that the Enhanced Tenancy Management Fee for sheltered housing does not fully cover the cost of the sheltered housing service and some cost is therefore met from rental income.

Existing social rent tenants will see no increase in their total housing cost as a result of the changes set out in this report as the cost of de-pooled service charges is deducted from the net rent. The only change in cost from April 2024 onwards will reflect annual rent increase and review of service charge costs. The rent for tenants on Affordable Rents is inclusive of service charges already and so this change will not change the total rent which can be charged, subject to the April 2024 rent increase.

New tenancies created from 1 April 2024 and let on a social rent, will not have their rent discounted to reflect introduction of the new service charges.

5.0 Risk Implications

- 5.1 The approach will provide all tenants and leaseholders with clear understanding of the services they receive and the cost of these services. This increases transparency and ensures that the Council can be held to account for the services it provides through the Housing Revenue Account. Whilst this may lead to more queries and challenges on service charge costs or the quality of services, the Council has a clear and consistent approach to calculating service charges based on costs of service delivery.

6.0 Legal Implications

- 6.1 The Housing Act 1985 and Landlord and Tenant Act 1985 legislation includes a specific requirement for landlords to consult on all major changes to a tenant/leaseholders tenancy/lease agreements. All tenants/leaseholders have been consulted on the changes set out in this report, the outcome of that consultation has informed this report and the recommendation to implement de-pooling and the introduction of differential service charges to reflect different levels of services.

7.0 Background Papers

HRA Service Charge Review – Cabinet Report 11 September 2023

Areas of consideration: e.g. does this report raise any of the following issues and if so how have these been considered/mitigated against?

Consultations	Comment
Monitoring Officer Consultation:	Pre-circulated for comment
Section 151 Officer Consultation:	Pre-circulated for comment
Existing Council Policies:	N/A
Equality Issues/EQIA assessment:	All tenants and leaseholders were consulted on the proposed change. An EQIA will be undertaken of the impact of the changes set out in the report.



Service Charge Consultation

We would very much value your views about some proposed changes to how rent and service charges are set by Great Yarmouth Borough Council, investment in the Council's homes and how we communicate with you. Please take a few minutes to answer the questions here and, at the end of the survey, there is some information and definitions to help explain what is being proposed. If you prefer to complete this survey online, please use the link below or scan the QR code.



Link: **<https://forms.office.com/e/VZPecEwa60>**

We are asking for your name and address to support feedback to any questions and comments.

Name:

First line of address:

Email:

Section 1 – About your home

1. What type of home do you live in?

Flat ☐ Bungalow ☐ Maisonette ☐ House ☐

2. Do you have a communal area / shared space

Yes ☐ No ☐

3. Do you live in sheltered housing?

Yes ☐ No ☐

Section 2 – Service Charges

4. Do you agree with the principle that only those tenants who receive a service should pay for that service? For example, should only tenants who have communal areas pay for the ground's maintenance of those areas, rather than this cost being paid out of the rent of all council homes?

Strongly agree ☐ Agree ☐ Not sure ☐ Disagree ☐ Strongly disagree ☐

5. Do you agree with the proposal to introduce service charges for the tenants who receive that service, so it is no longer part of the rent (de-pooling)? For example, introducing charges for tenants who live in flats and have communal lighting or charging for grounds maintenance of communal areas.

Strongly agree ☐ Agree ☐ Not sure ☐ Disagree ☐ Strongly disagree ☐

6. Do you think showing service charges separately from rent is fairer than what we currently do?

Strongly agree ☐ Agree ☐ Not sure ☐ Disagree ☐ Strongly disagree ☐

7. Do you agree with the principle that tenants who receive a more frequent service such as caretaking or grounds maintenance should pay more than those tenants who receive a less frequent service?

Strongly agree ☐ Agree ☐ Not sure ☐ Disagree ☐ Strongly disagree ☐

8. Do you agree with the proposal to change the caretaking charge so there are different service charges to reflect how often the caretakers visit and clean an area or how often the grounds maintenance service cut the grass/tidy communal areas?

Strongly agree ☐ Agree ☐ Not sure ☐ Disagree ☐ Strongly disagree ☐

9. Do you think having different costs for services to reflect the frequency of that service will be fairer than all tenants paying the same charge?

Much fairer ☐ Yes, this is fair ☐ Not sure ☐ Unfair ☐ Very unfair ☐

The Feedback from the Survey of Tenants and Residents carried out earlier this year and feedback from the Caretaking and Gardening surveys, shows that many tenants and leaseholders have commented that grass cuttings are not collected when the grass is cut. The current contract for grounds maintenance does not include collection of grass cuttings. The council is considering amending this contract to include grass cutting collection, but this would increase the service charge for people as it would be an enhancement of the current service. At the moment, we do not know how much extra this would cost, but we do want your views on the principle of introducing an additional charge to collect grass cuttings.

10. In principle, do you support the grounds maintenance charge being higher if grass cuttings were collected?

Yes ☐

No ☐

I don't know ☐

Section 3 – Getting involved

The Council is currently producing a new Housing Investment Plan which will provide a clear, costed investment plan for the next five years setting out how the Great Yarmouth Borough Council will invest in existing and new council homes. The plan is in its very early stages, and we would like your views on the plan and how your rent is invested in new and existing homes. You can be involved by attending a workshop, answering some survey questions online or via a paper survey. We are also developing a number of new policies, such as the Estates Services Policy and reviewing existing policies and strategies and we would like your thoughts on these to ensure they reflect what you think is important.

If you would like to be involved and share your views, please let us know how you would like to be contacted and what you would like to be involved with. There is no commitment, and you can change your mind at any time. If you do not want to get involved please answer question 13 below.

11. How do you want to be involved? (tick all that apply)

Attend a workshop ☐ Complete a paper survey ☐ Complete an online survey ☐

12. Do you want to be involved in the development of:

Housing Investment Plan ☐ Other strategies and policies ☐

Something else? – If yes please state below (what is important to you that you would like to have a say on)

Section 4 – News & Views Magazine

Please let us know what types of articles and information you would like included in future editions of News and Views. Please tick all that apply. Please also tell us if there is anything else you would like to see in News and Views. **Information on:**

Support to help me manage my finances ☐

Support to help me manage my tenancy ☐ My rights and responsibilities as a tenant ☐

The service standards for the housing service ☐

Damp and mould – how the Council will respond to reports of damp and mould ☐

13. Articles on:

How to share your views on the service ☐

A day in the life of a Housing employee (i.e. Caretaker, Housing Officer) ☐

Grants available to improve your local area ☐

New schemes and initiatives ☐

Please use the space here to list your ideas on what else you would like to see included:

14. News and Views is a magazine which is distributed at least twice a year. Would you be interested in receiving a digital version by email or receiving a link to an interactive online version? Please let us know how you would prefer to receive News and Views in the future:

Through the post as a magazine ☐

By email ☐

An email link to an online interactive magazine ☐

Thank you for sharing your views. Please return your completed form using the pre-paid envelope by 6 November 2023.

Service Charge Consultation Information and Definitions

What is a communal area?

Any shared area available for tenants including green space, paved areas, drying areas, stairwells, internal corridors or walkways.

What is grounds maintenance?

Cutting the grass in communal areas, maintaining shrub beds and trees in communal areas, weed control and sweeping of paved areas.

What is caretaking?

Caretaking includes health and safety checks, cleaning of internal areas and removal of litter.

How would new service charges be calculated?

If a grounds maintenance charge was introduced, the annual cost of the service would be divided by the number of homes which benefit from the service. This annual cost per property would be divided by 50 weeks to work out the weekly service charge.



Leaseholder Service Charge Consultation

Please let us know your view on the proposed changes to service charges. At the end of this survey is some additional information and definitions in relation to the proposed changes.

Name:

First line of address:

Email:

Survey Questions

1. Do you have a communal area / shared space

Yes ☐ No ☐

2. Do you agree with the principle that tenants and leaseholders who receive a more frequent service such as caretaking or grounds maintenance should pay more than those tenants who receive a less frequent service?

Strongly agree ☐ Agree ☐ Not sure ☐ Disagree ☐ Strongly disagree ☐

3. Do you agree with the proposal to change the caretaking charge so there are different service charges to reflect how often the caretakers visit and clean an area or how often the grounds maintenance service cut the grass/tidy communal areas?

Strongly agree ☐ Agree ☐ Not sure ☐ Disagree ☐ Strongly disagree ☐

4. Do you think having different costs for services to reflect the frequency of that service will be fairer than all leaseholders paying the same charge?

Much fairer ☐ Yes, this is fair ☐ Not sure ☐ Unfair ☐ Very unfair ☐

5. The Feedback from the Survey of Tenants and Residents carried out earlier this year and feedback from the Caretaking and Gardening surveys, shows that many tenants and leaseholders have commented that grass cuttings are not collected when the grass is cut. The current contract for grounds maintenance does not include collection of grass cuttings. The council is considering amending this contract to include grass cutting collection, but this would increase the service charge for people as it would be an enhancement of the current service. At the moment, we do not know how much extra this would cost, but we do want your views on the principle of introducing an additional charge to collect grass cuttings.

In principle, do you support the grounds maintenance charge being higher if grass cuttings were collected?

Yes ☐ No ☐ I don't know ☐

6. News and Views

Please let us know what types of articles and information you would like included in future editions of News and Views. Please tick all that apply. Please also tell us if there is anything else you would like to see in News and Views.

Articles on:

How to share your views on the service ☐

A day in the life of a Housing employee (i.e. Caretaker, Housing Officer) ☐

Grants available to improve your local area ☐

New schemes and initiatives ☐

Please use the space here to list your ideas on what else you would like to see included:

7. News and Views is a magazine which is distributed at least twice a year. Would you be interested in receiving a digital version by email or receiving a link to an interactive online version? Please let us know how you would prefer to receive News and Views in the future:

Through the post as a magazine ☐

By email ☐

An email link to an online interactive magazine ☐

Service Charge Consultation Information and Definitions

What is a communal area?

Any shared area available for tenants including green space, paved areas, drying areas, stairwells, internal corridors or walkways.

What is grounds maintenance?

Cutting the grass in communal areas, maintaining shrub beds and trees in communal areas, weed control and sweeping of paved areas.

What is caretaking?

Caretaking includes health and safety checks, cleaning of internal areas and removal of litter.

Appendix B: Consultation Results

A total of 855 surveys were returned:

- Tenant responses – 790
- Leaseholder responses – 65

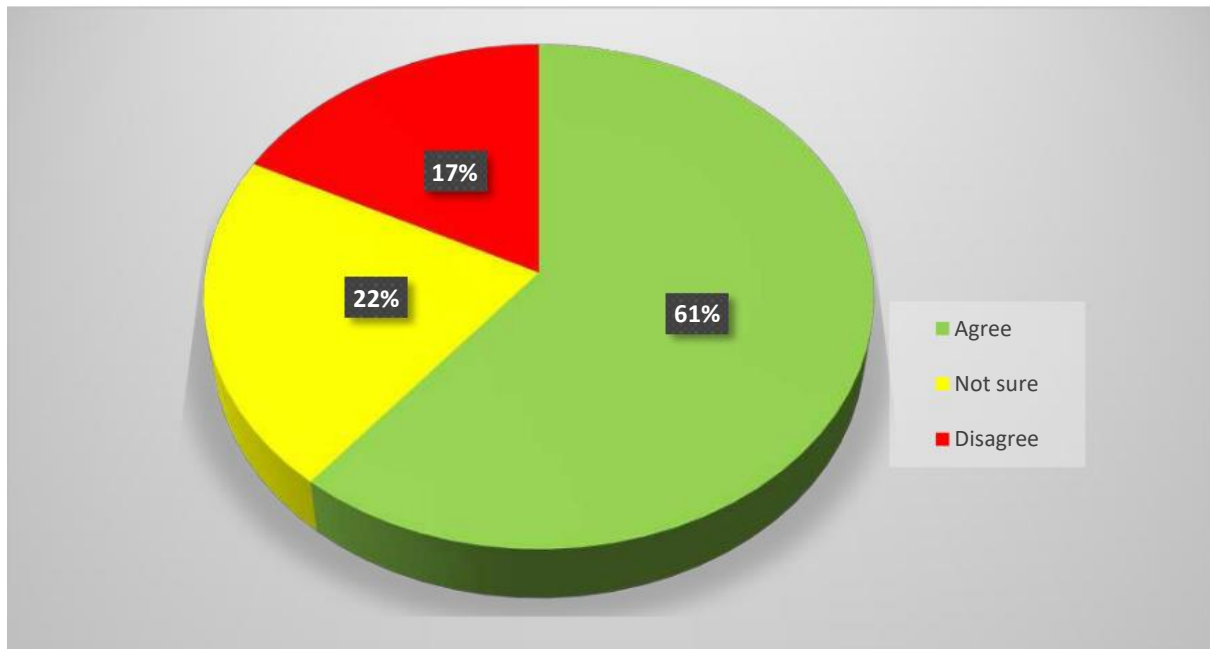
Note that not all questions were responded to for each returned survey. The charts show the percentage of responses to the specific question.

For tenants, where the respondent provided this information, the results below are broken down according to the type of home.

The charts below show the responses for each question in the order asked in the survey.

Section 1: Questions asked of both tenants and leaseholders

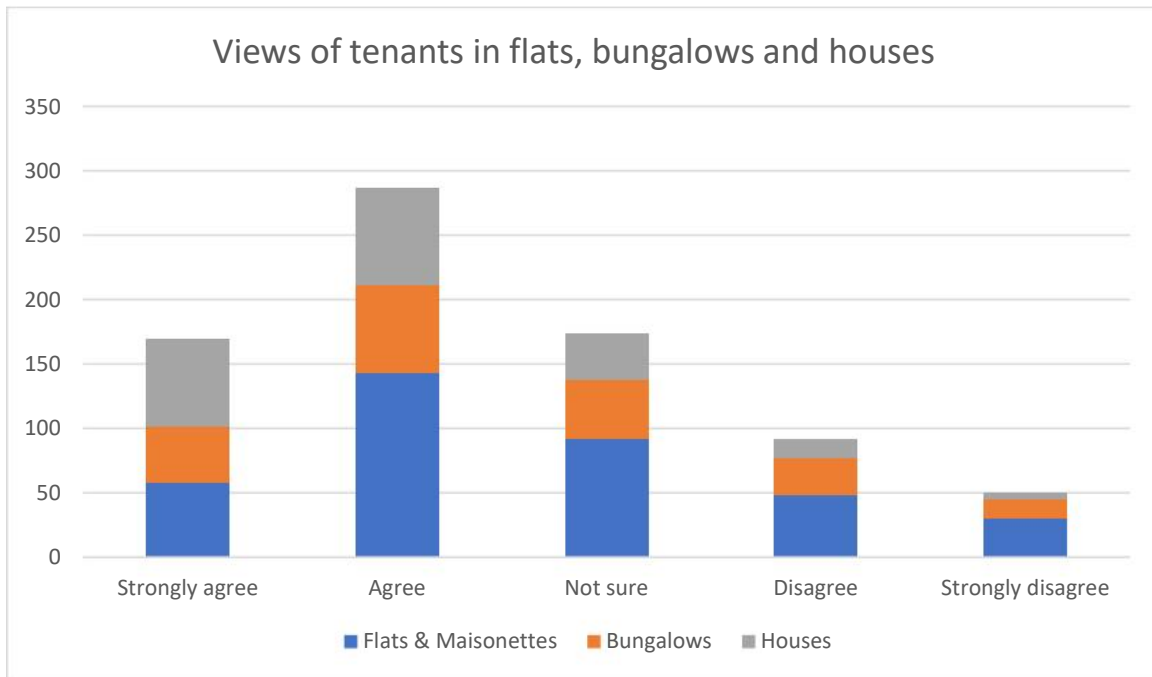
Question: Do you agree with the principle that tenants and leaseholders who receive a more frequent service such as caretaking or grounds maintenance should pay more than those tenants who receive a less frequent service?



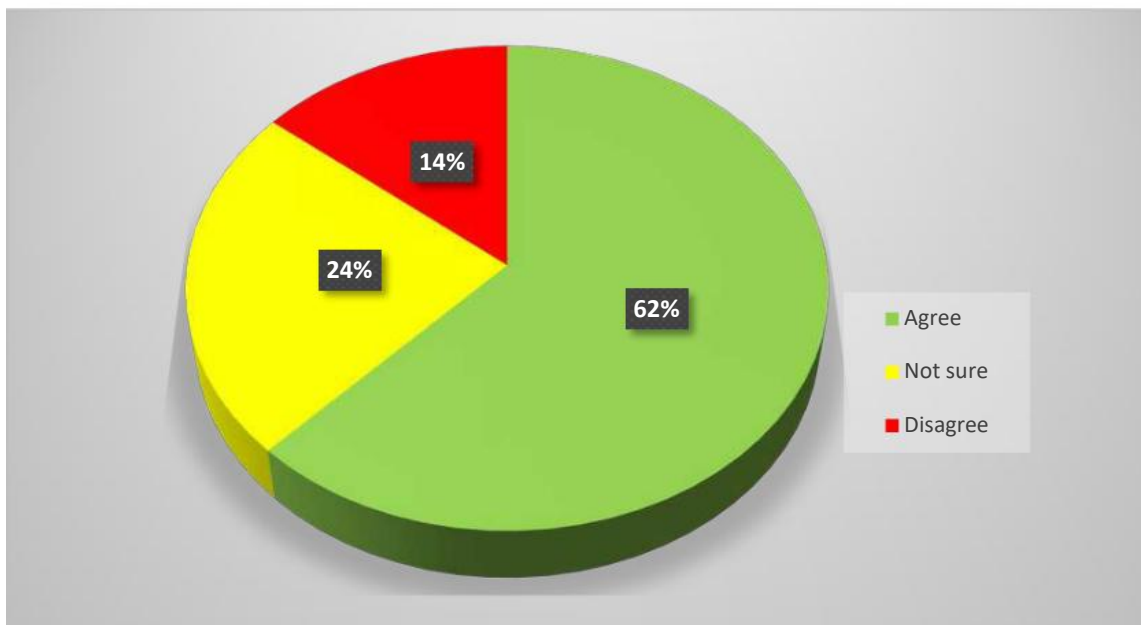
Respondent	Strongly agree	Agree	Not sure	Disagree	Strongly disagree	Response percent agree
TOTAL Combined	205	306	181	94	53	60.91%
Tenants only	172	287	175	92	50	59.15%
Leaseholders	33	19	7	2	3	82.54%

The table below provides a breakdown of responses by property type (tenants only):

Answer Options	Bungalow	Flat	House	Maisonette	Not known	Response percent	Response count
Strongly agree	43	53	69	5	1	22.09%	171
Agree	69	139	75	3	0	36.95%	286
Not sure	47	87	36	4	1	22.61%	175
Disagree	28	46	15	2	1	11.89%	92
Strongly disagree	16	27	5	2	0	6.46%	50
Total tenants answered							774
Total skipped / anonymous address							16



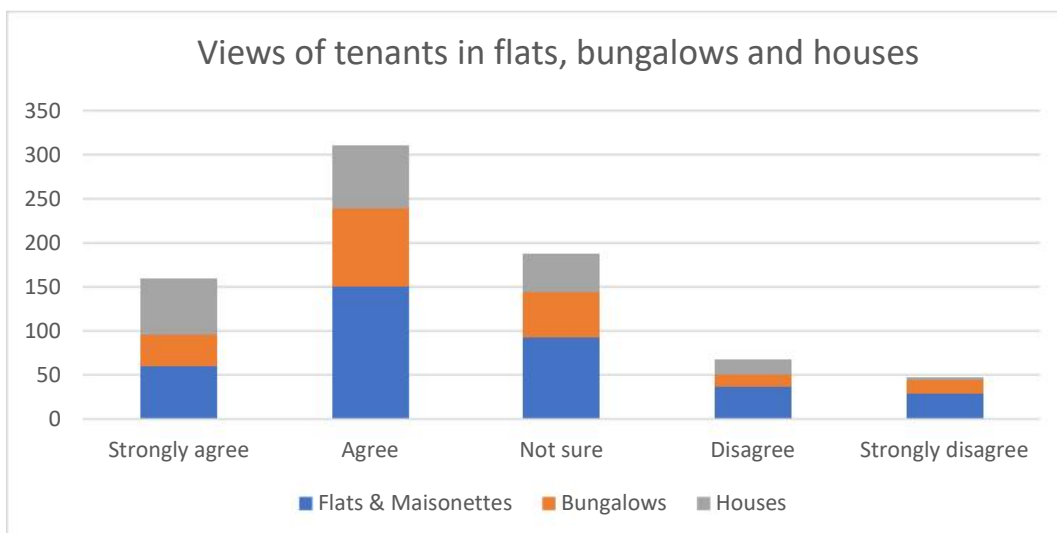
Question: Do you agree with the proposal to change the caretaking charge so there are different service charges to reflect how often the caretakers visit and clean an area or how often the grounds maintenance service cut the grass/tidy communal areas?



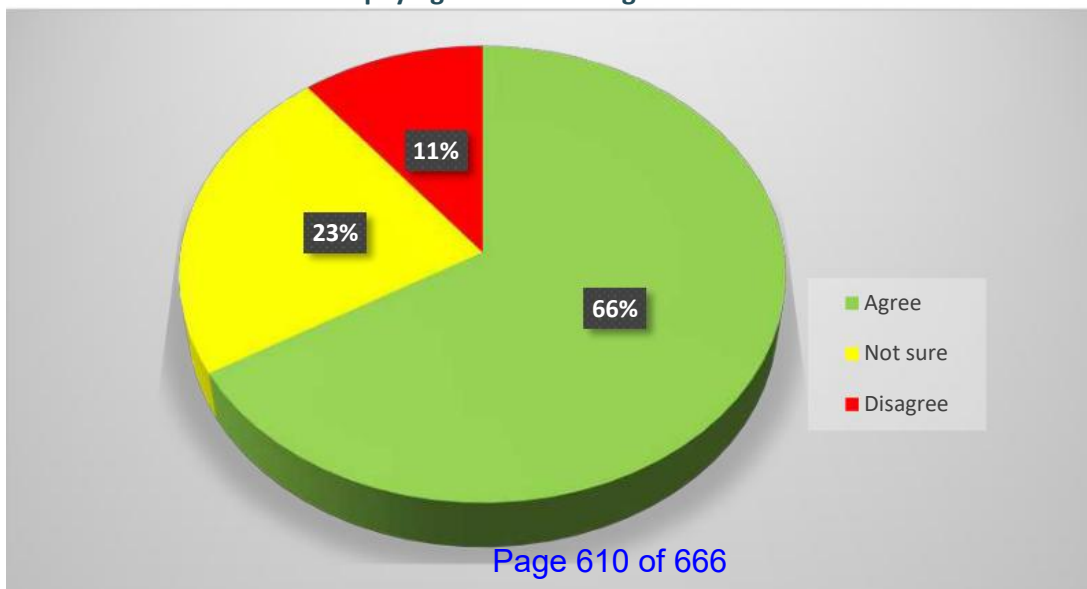
Respondents	Strongly agree	Agree	Not sure	Disagree	Strongly disagree	Response percent agree
TOTAL Combined	193	331	199	69	50	62.23%
Tenants	161	313	189	67	48	60.93%
Leaseholders	32	18	10	2	2	78.13%

The table below provides a breakdown of responses by property type (tenants only):

Answer Options	Bungalow	Flat	House	Maisonette	Not known	Response percent	Response count
Strongly agree	36	56	64	4	1	20.70%	161
Agree	89	144	71	6	1	40.10%	311
Not sure	51	89	44	4	1	24.32%	189
Disagree	14	37	16	0	0	8.67%	67
Strongly disagree	15	27	4	2	0	6.21%	48
Total answered							776
Total skipped							14



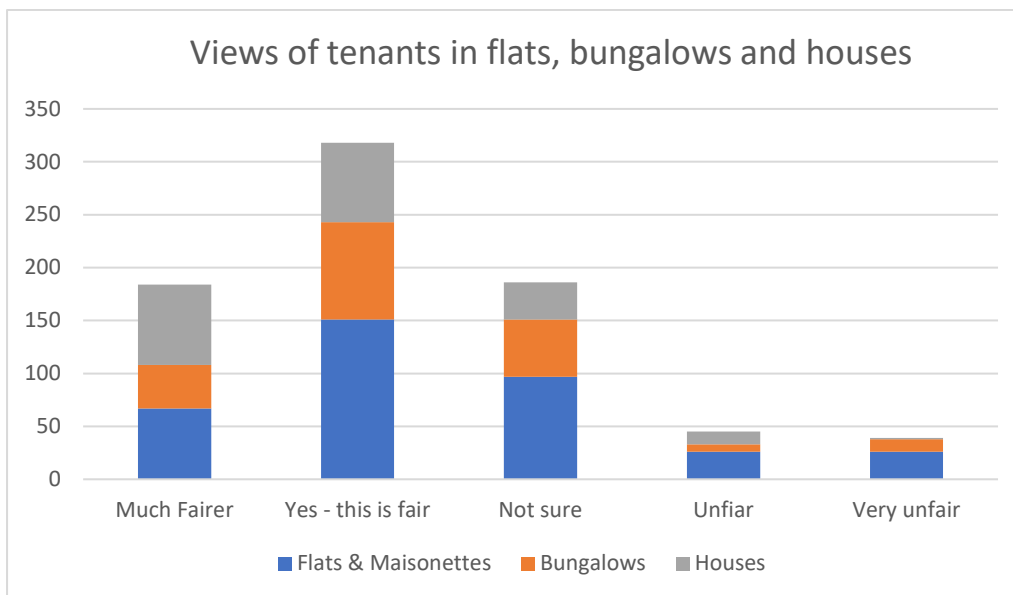
Question: Do you think having different costs for services to reflect the frequency of that service will be fairer than all tenants paying the same charge?



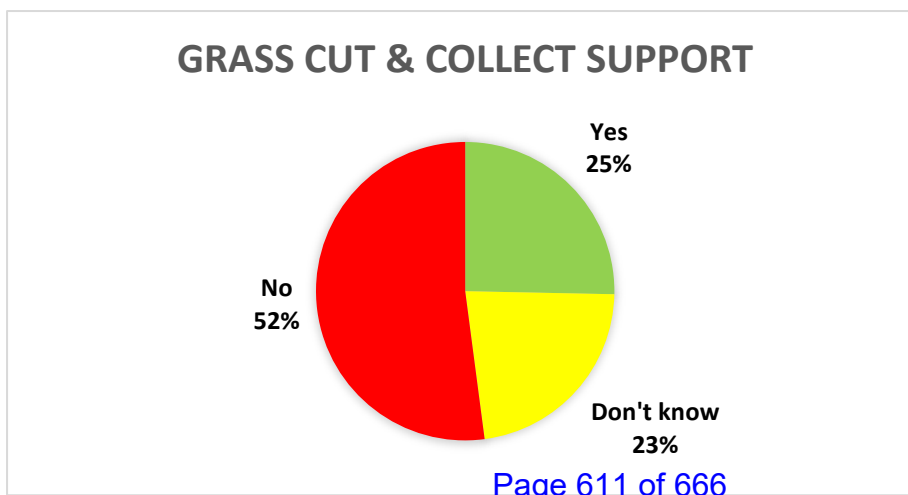
Respondents	Strongly agree	Agree	Not sure	Disagree	Strongly disagree	Response percent agree
TOTAL Combined	216	344	192	47	43	66.51%
Tenants	185	322	186	67	48	65.25%
Leaseholders	31	22	6	2	4	82.81%

The table below provides a breakdown of responses by property type (tenants only):

Answer Options	Bungalow	Flat	House	Maisonette	Not known	Response percent	Response count
Much fairer	41	62	76	5	1	23.87%	185
Yes – this is fair	92	145	75	6	2	41.29%	320
Not sure	54	94	35	3	0	24.00%	186
Unfair	7	26	12	0	0	5.81%	45
Very unfair	12	24	1	2	0	5.03%	39
	Total answered						775
	Total skipped						15



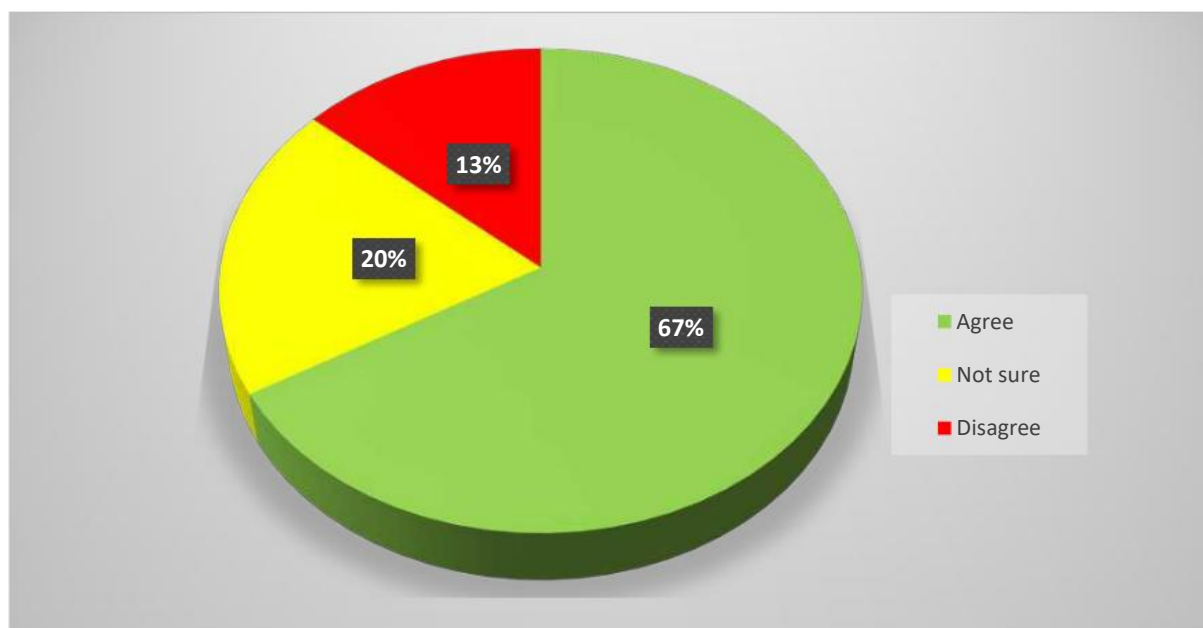
Question: In principle, do you support the grounds maintenance charge being higher if grass cuttings were collected?



Q7 - Grass Collection	Yes communal area	No communal area	Live in sheltered housing	Leasehold	Overall	Percentage overall
Yes	92	113	61	7	213	25.33%
Don't know	64	175	39	15	190	22.59%
No	193	109	122	41	438	52.08%
TOTAL					841	
Total skipped / anonymous address					9	

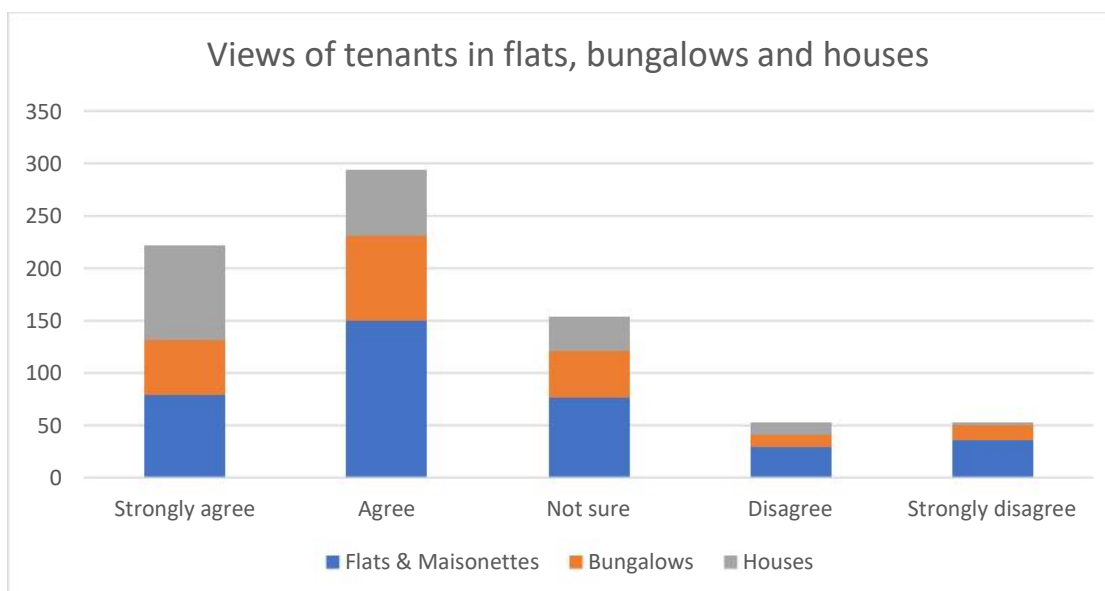
Section 2: Additional questions for tenants

Question: Do you agree with the principle that only those tenants who receive a service should pay for that service? For example, should only tenants who have communal areas pay for the ground's maintenance of those areas, rather than this cost being paid out of the rent of all council homes?

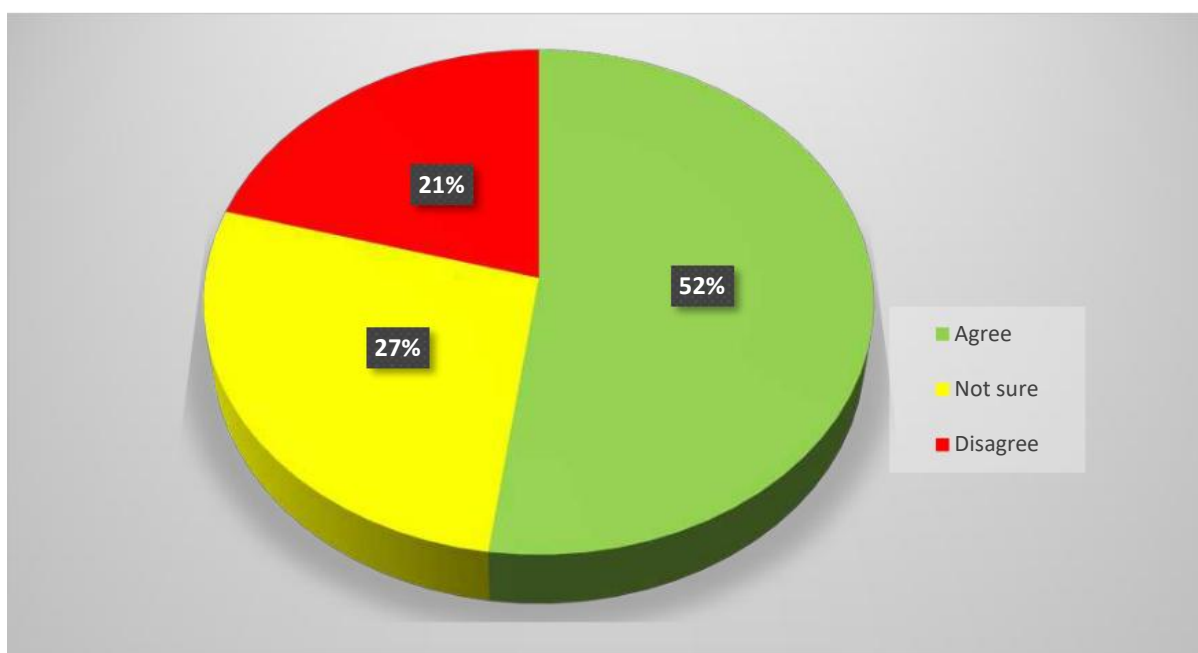


Detail of tenant responses according to type of home on the principle of only paying for services received:

Answer Options	Bungalow	Flat	House	Maisonette	Not known	Response percent	Response count
Strongly agree	52	76	91	3	1	28.63%	223
Agree	82	142	62	8	2	38.00%	296
Not sure	45	73	33	3	0	19.77%	154
Disagree	12	29	12	0	0	6.80%	53
Strongly disagree	15	33	3	2	0	6.80%	53
Total answered							778
Total skipped / anonymous address							11

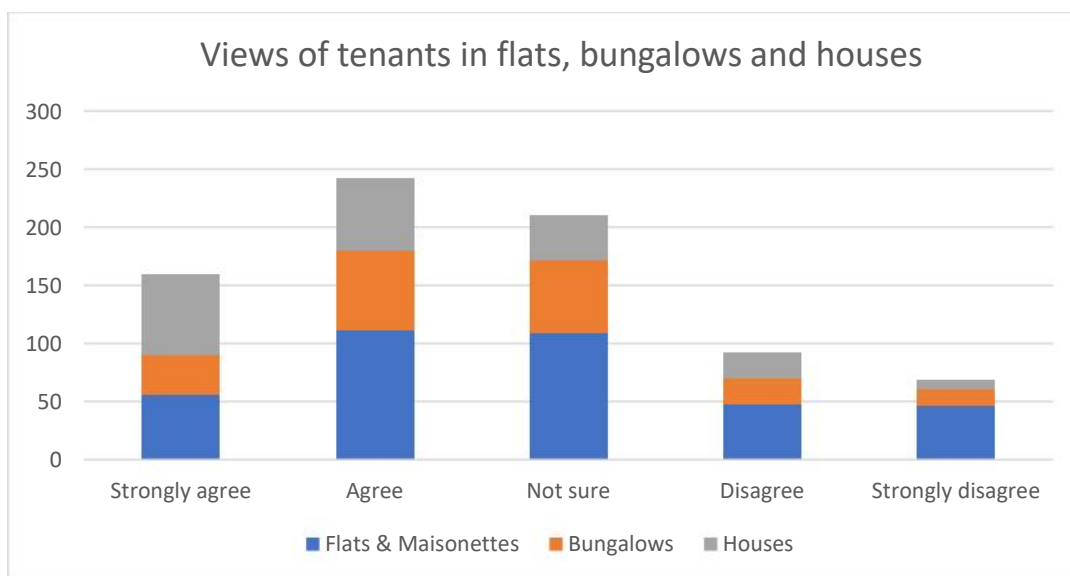


Question: Do you agree with the proposal to introduce service charges for the tenants who receive that service, so it is no longer part of the rent (de-pooling)? For example, introducing charges for tenants who live in flats and have communal lighting or charging for grounds maintenance of communal areas.

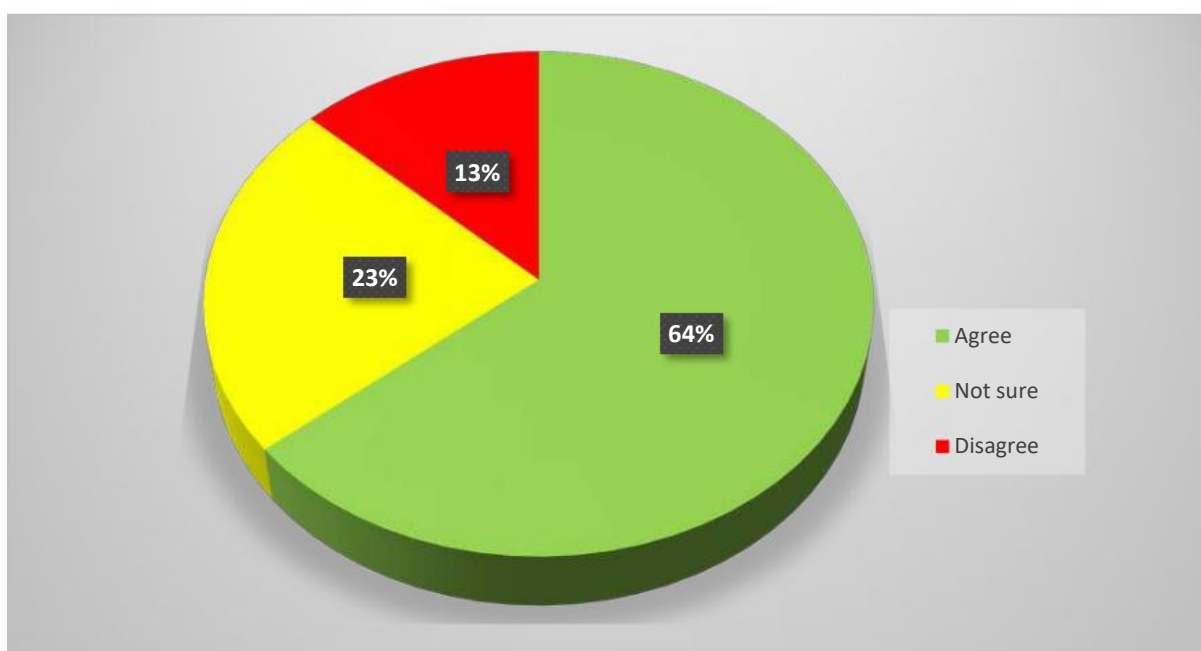


Detail of tenant responses according to type of home Support proposal to introduce service charge for those who receive the service (de-pooling):

Answer Options	Bungalow	Flat	House	Maisonette	Not known	Response percent	Response count
Strongly agree	35	54	69	1	1	20.67%	160
Agree	68	105	63	6	1	31.40%	243
Not sure	64	101	38	7	1	27.26%	211
Disagree	22	48	22	0	0	11.89%	92
Strongly disagree	14	44	8	2	0	8.79%	68
Total answered							774
Total skipped / anonymous address							16



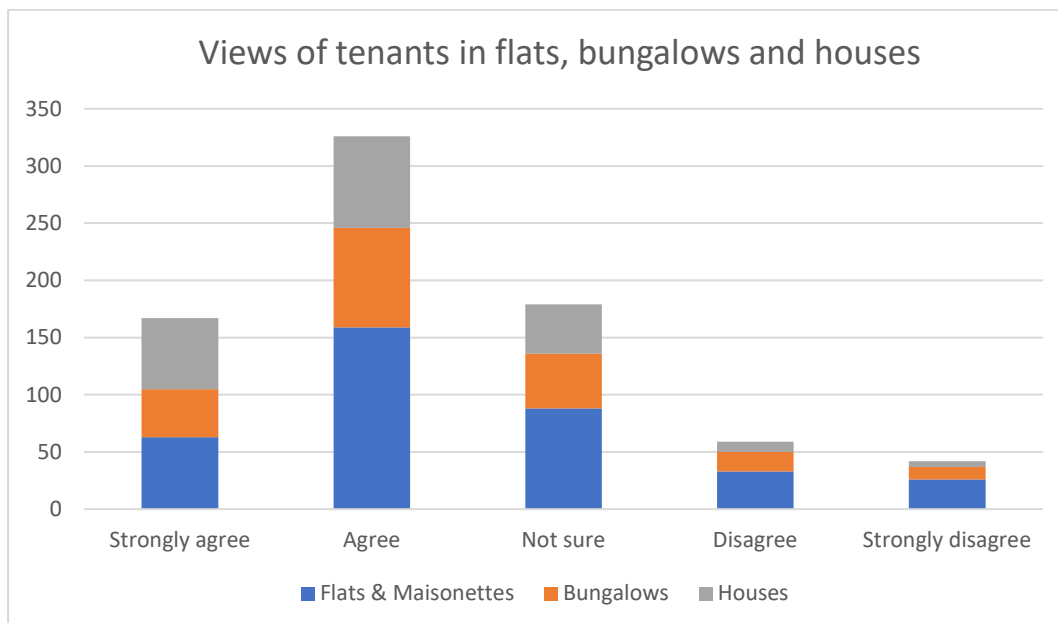
Question: Do you think showing service charges separately from rent is fairer than what we currently do?



Respondents	Strongly agree	Agree	Not sure	Disagree	Strongly disagree	Response percent agree
Tenants	169	329	179	59	42	64.01%

Detail of tenant responses according to type of home on showing service charges separately:

Answer Options	Bungalow	Flat	House	Maisonette	Not known	Response percent	Response count
Strongly agree	42	60	62	3	2	21.72%	169
Agree	87	151	80	8	1	42.29%	329
Not sure	48	85	43	3	0	23.01%	179
Disagree	17	33	9	0	0	7.58%	59
Strongly disagree	11	24	5	2	0	5.40%	42
Total answered							778
Total skipped / anonymous address							12



Summary of comments

Comments – Tenant Survey

There were 107 comments left as part of the completion of the survey. Of these, 32 were directly related to the consultation.

In summary comments and questions were related to:

- Ability to opt in and out of a charge – examples given included communal aerial where this is not used due to using an alternative supply / communal aerial does not support Sky TV
- Consideration to residents adopting areas or taking on responsibility for communal cleaning or gardening
- Support / suggestion for additional charges to cover carpets, blinds, white goods to support new households and existing tenants
- Support that everyone should share the charges to maintain a social community
- The current frequency of services and the choice tenants have (more and less)
- Quality of work and standards – what are tenants paying for and best use of time particularly referencing grass cutting when it does not need doing can operatives carry out other jobs including weeding and moss removal. Comments also included re-tendering the grass cutting due to the poor services delivered this year
- Value for money
- Query of standards should expect and confusion with wider borough services and council tax – clearly some respondents not clear on whose role or who is responsible for a local area
- Concern that itemising everything would lead to an increase in charges
- Query about how this is paid where there are private houses (RTB) on a street and whether tenants take an unfair proportion

Comments – Leaseholder survey

There were 15 comments left as part of the completion of the survey. Of these, 10 were directly related to the consultation.

In summary comments and questions were related to:

- Frequency of service (too much/too little)

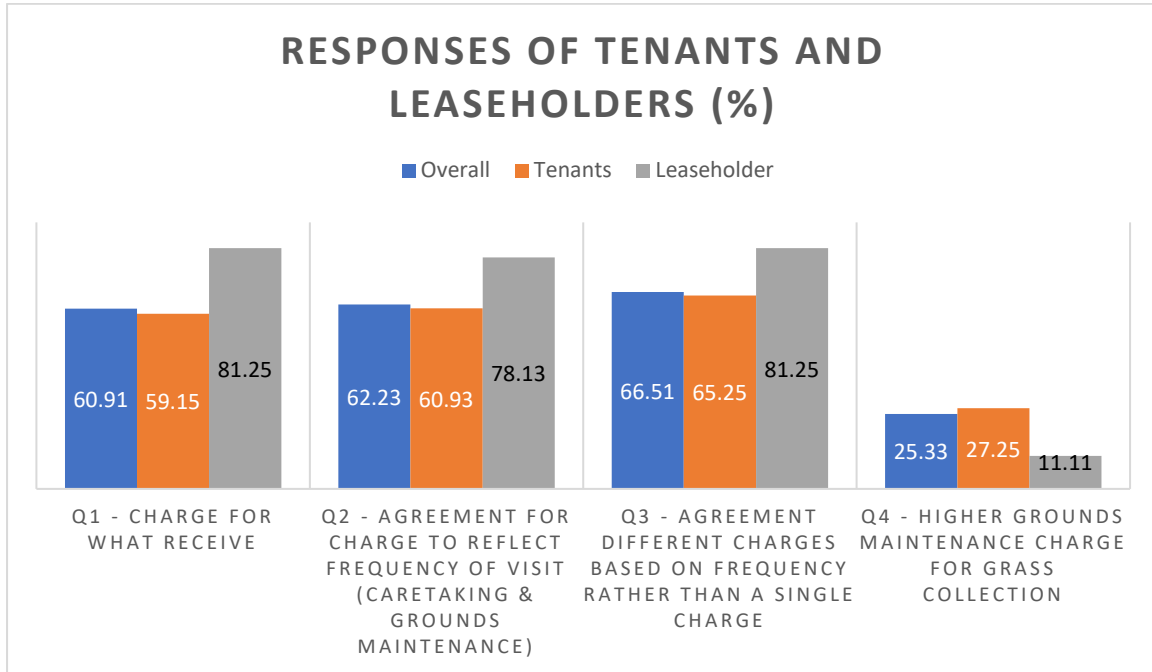
- Service standards and expectations – clarity of what paying for

Other comments relate to:

- More transparency on expenditure
- Leasehold service management fee (why/high cost)

Tenant and Leaseholder Responses Analysis

Leaseholders have a greater tendency to support the principles and proposals than tenants, other than in relation to question 4.



CABINET



URN: 23-205

Report Title : Update – Regulation of Investigatory Powers Act 2000

Report to: Cabinet

Date of meeting : 8th January 2024

Responsible Cabinet Member:

Responsible Director / Officer : Monitoring Officer

Is this a Key decision ? No

Date added to Forward Plan of Key Decisions if a Key Decision: N/A

EXECUTIVE SUMMARY / INTRODUCTION FROM CABINET MEMBER

To advise Cabinet that: (i) no requests have been made for covert surveillance to be undertaken under the Regulation of Investigatory Powers Act 2000 (RIPA) since the last report in September 2020 and that following advice from the Investigatory Powers Commissioner's Office (IPCO); (ii) an appendix has been added to the Council's RIPA policy to provide guidance on the use of social media in surveillance activity, and that (iii) officer training will be undertaken in 2024.

RECOMMENDATION:

That Cabinet note the report.

1. Introduction

The Council has not exercised covert surveillance powers under RIPA since December 2011 and the last authorisation given was cancelled within the same month. It is the Council's starting position that covert surveillance, to which RIPA relates, should not be used, but that this position should be kept under review, and reconsidered if proportionate need should arise.

It is a requirement that Members are advised annually of any requests made by officers to carry out surveillance under RIPA, even where this is nil.

An inspection of local authorities' RIPA records and policy is undertaken by IPCO every three years approximately. Following the previous inspection of the Council's records by IPCO in 2020 the Inspector recommended a number of policy updates which were implemented in September 2020.

An additional suggestion arising from the inspection the was that the Council adopt guidance in relation to the use of social media in investigative or enforcement work, even if the extent of the impact was only to make officers aware of when they might be at risk of crossing the line into covert surveillance, so as to avoid it. Managers should also monitor any investigative activity undertaken by their teams to determine whether the guidance is being followed.

Regular RIPA training for officers is also a requirement, even in those authorities where covert surveillance is not currently undertaken. Again, this will have the effect of raising officer awareness to prevent covert surveillance being undertaken inadvertently, as well as preparing officers for the application/authorisation process should the need arise.

GYBC is due an inspection by IPCO. The inspector would look at records, policy and the state of officer awareness/training. As yet no date has been confirmed for an inspection.

2. Authorisations

Members are advised that over the past three years since the last inspection no requests have been made by any service area to seek authorisation for covert surveillance as defined under RIPA. Statistics on authorisations are required to be reported to IPCO by the end of January each year.

3. Policy Update

The Social Media Guidance (attached) has already been provided to officers for operational use in the form of an appendix to the RIPA policy.

4. Training

Training was last carried out in 2018. Training for officers with investigative or enforcement roles, and for the Executive Directors and CEO, who authorize applications internally (prior to application to a Magistrate) will be carried out by June 2024.

5. Financial Implications

Funding for officer training comes from the corporate training budget.

6. Legal & Risk Implications

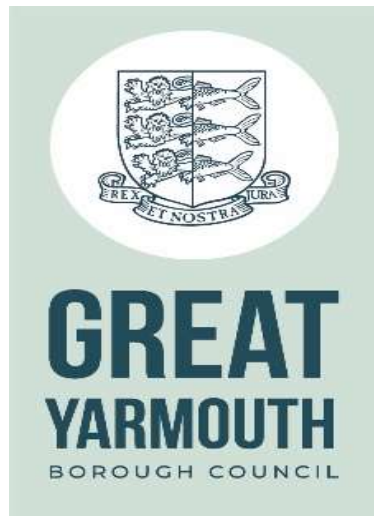
A failure to understand and apply RIPA correctly could lead to a breach of human rights, and/or may impact on the admissibility of evidence in enforcement proceedings.

7. Background Papers

None

Areas of consideration: e.g. does this report raise any of the following issues and if so how have these been considered/mitigated against?

Consultations	Comment
Monitoring Officer Consultation:	MO's report
Section 151 Officer Consultation:	At ELT
Existing Council Policies:	RIPA Policy
Equality Issues/EQIA assessment:	No



USE OF SOCIAL MEDIA IN INVESTIGATIONS PROCEDURE

Head of Legal and Governance

Great Yarmouth Borough Council

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1 CONTEXT - REGULATION OF INVESTIGATORY POWERS ACT 2000 (RIPA)

- 1.1 This procedure should be read in conjunction with the Council's RIPA Policy, as well as the statutory codes of practice issued by the Secretary of State and the Investigatory Powers Commissioner's Office (IPCO).
- 1.2 The purpose of this procedure is to help officers understand when use of social media in investigative work may be acceptable and when it is not permitted without a formal authorisation under RIPA.
- 1.3 It applies to any investigatory work undertaken by officers.
- 1.4 RIPA authorisation of the use of social media provides safeguards if a claim is made under Article 8 of the European Convention on Human Rights (the right to respect for private and family life).
- 1.5 For a criminal investigation, evidence obtained contrary to procedure may be inadmissible, as well leaving scope for a civil action against the Council.
- 1.6 Social media has become a significant part of many people's lives, with people regularly using and interacting with many different forms of social media. By its very nature, social media accumulates a sizable amount of information about a person's life, from daily routines to specific events. Their accessibility on mobile devices can also mean that a person's precise location at a given time may also be recorded whenever they interact with a form of social media on their devices.
- 1.7 Social media can therefore be a very useful tool when investigating alleged offences with a view to bringing a prosecution in the courts or taking other action. The use of information gathered from the various different forms of social media available can go some way to proving or disproving, for example, whether a statement made by a defendant, or an allegation made by a complainant, is truthful or not.
- 1.8 Not all information published on social media is true and care must be taken as to the validity of information recorded. The information obtained must only relate to the investigation being carried out and not for a general "fishing" expedition.

2 MEANING OF ‘SOCIAL MEDIA’ IN THIS PROCEDURE

- 2.1 Social media encompasses a wide and dynamic range of web-based services typically facilitating individuals or businesses to construct a public or semi-public profile or creating a platform for sharing views or information. Typical characteristics include: - the ability to show a list of other users with whom the primary user shares a connection, often termed “friends” or “followers” - Hosting capabilities for audio, photographs and video content. It includes community based web sites, online discussion forums and chat rooms. This is not an exhaustive list and similar or new websites or communication systems will also fall within scope of the term.
- 2.2 Current examples include: - Facebook - Twitter - Instagram - LinkedIn - Pinterest - TikTok - Tumblr - Flickr - YouTube - Reddit

3 RELEVANCE OF PRIVACY SETTINGS

- 3.1 The majority of social media services will allow its users to dictate who can view their activity, and to what degree through the use of privacy settings.
- 3.2 The information publicly available is known as an individual’s public profile.
- 3.3 Publishing content or information using a public, rather than a private setting, means that the individual publishing it is allowing everyone to access and use that information and to associate it with them. It should not be seen however as authority to be monitored by the council. The information is still the property of that individual.
- 3.4 The opposite of a public profile is a private profile, where a user does not allow everyone to access and use their content, and respect should be shown to that person’s right to privacy under Article 8.
- 3.5 Even though a user has set their profile to be private it might be shared by a third party who has a public profile. Care should be taken in such cases and if there is any doubt about the use of such information discuss it with your manager.

4 THE PRINCIPLES

- 4.1 The diversity of social media means that it is impracticable to prescribe the threshold for requiring authorisation under RIPA in all of the various scenarios that may exist. Ultimately any decision to make an application should be taken pragmatically and then actioned as per the relevant policies and procedures as referenced above.
- 4.2 If in any doubt, the guiding principle is to refer to a line manager, with assistance from Legal Services, as necessary.
- 4.3 Reviewing open source sites does not require authorisation unless the review is carried out with some regularity.
- 4.4 Using social media for investigatory purposes, under statutory powers or otherwise, will meet the definition of “**directed surveillance**” if it is:
- i) covert;
 - ii) likely to reveal private information; and
 - iii) done with some regularity

The primary consideration is then the privacy setting and whether the person being monitored has a public or private profile. A public profile will allow anyone to see information whereas with a private profile you have to be a friend of the person to see information about them.

- 4.5 A “one-off” is one on-line visit or a series of three or four visits that are closely connected in purpose, time and stage of the investigation. For example three visits within two weeks of each other could be a “one-off” if they relate to the same investigation and are closely related. However if there is a visit once a week for several weeks that would not be a “one-off” as it would appear to be monitoring the activity of the person.
- 4.6 It follows that there is no real difference between information from a social media source with public settings and a public website. A “one-off” piece of surveillance therefore would be outside the remit of the RIPA authorisation process.

- 4.7 For any surveillance that is more than a one-off those involved in considering whether to seek a RIPA authorisation should consider the parallel situation: live, covert observance of a person in public places.
- 4.8 A planned “one-off” drive-by, to establish a simple fact about a person, such as their place of abode, will also not require an authorisation, where there are no known other facts, such as a transaction occurring at the same time, likely to reveal private information.
- 4.9 If there are repeated observances, constituting more than a one-off, then the investigator should consider the real life, parallel situation and relate the use of internet to following a person, covertly, but in public. If an authorisation would be required in the real world, one would also be required in the virtual world.
- 4.10 Continued covert visits are likely to be unjustifiable without formal consideration under RIPA. Further surveillance by an investigating officer looking to obtain potential evidence requires a review of the need for authorisation with a line manager.
- 4.11 Further considerations will then include the reason for the surveillance and collateral information that may reasonably be suspected of being detected, as a precursor to a procedural application. Generally, the more necessary and proportionate the surveillance, the more likely that a formal application will be required.
- 4.12 Where there is need to apply on-line to join a platform this may require authorisation for use of a CHIS. This will be dependent on the existence of a “relationship.”
- 4.13 If the application to join a site is a formality and there is no interaction with a suspect or their group, this will require a directed surveillance authorisation only.
- 4.14 The potential for a “relationship” to have been established or maintained must be considered formally with a line manager in such cases, obtaining advice from Legal Services as necessary.
- 4.15 Consideration must be given to the potential for the activity to constitute entrapment.
- 4.16 These rules apply to the use of any officer or agent of the Council

- 4.17 False identities are not unlawful, but real identities of others should not be adopted. However where it is considered that there is need to go beyond a person's privacy settings, by be-friending them using a false identity or pseudonym, this must be discussed with your manager and a RIPA authorisation will always be required. This can be equated to using a disguise to obtain information about a person which is directed surveillance and would require RIPA authorisation.
- 4.18 If you engage in any form of relationship with the account operator then s/he becomes a CHIS and will require RIPA authorisation as well as management by a Controller and Handler with a record being kept and a risk assessment created.

5. WHAT IS NOT PERMITTED UNDER THIS PROCEDURE

- 5.1 When it is discovered that an individual under investigation has set their social media account to private, officers should not attempt to circumvent those settings under any circumstances. Such attempts would include, but are not limited to:

- sending "friend" or "follow" requests to the individual, setting up or using bogus social media profiles in an attempt to gain access to the individual's private profile,
- contacting the individual through any form of instant messaging or chat function requesting access or information,
- asking family, friends, colleagues or any other third party to gain access on their behalf, or otherwise using the Social Media accounts of such people to gain access, or
- any other method which relies on the use of subterfuge or deception.

Officers should keep in mind that simply using profiles belonging to others, or indeed fake profiles, in order to carry out investigations does not provide them with any form of true anonymity. The location and identity of an officer carrying out a search can be easily traced through tracking of IP Addresses, and other electronic identifying markers.

- 5.2 Regardless of whether the social media profile belonging to a suspected offender is set to public or private, it should only ever be used for the purposes of evidence gathering. Interaction or conversation of any kind

should be avoided at all costs, and at no stage should an officer seek to make contact with the individual through the medium of social media. Any contact that is made may lead to accusations of harassment or, where a level of deception is employed by the officer, entrapment, either of which would be detrimental and potentially fatal to any future prosecution that may be considered.

- 5.3 If an officer needs to carry out any of the above then this must be discussed with their Manager and if necessary be approved by Legal Services.

6 CAPTURING EVIDENCE

- 6.1 Once a decision has been made to capture evidence from an individual's social media profile this must be recorded in writing and signed off by two officers. Content available from an individual's social media profile identified as being relevant to the investigation being undertaken then needs to be recorded and captured for the purposes of producing as evidence at any potential prosecution. Depending on the nature of the evidence, there are a number of ways in which this may be done.
- 6.2 Where evidence takes the form of a readable or otherwise observable content, such as text, status updates or photographs, it is acceptable for this to be copied directly from the site, or captured via a screenshot, onto a hard drive or some other form of storage device, and subsequently printed to a hard copy. The hard copy evidence should then be exhibited to a suitably prepared witness statement in the normal way. Where evidence takes the form of audio or video content, then efforts should be made to download that content onto a hard drive or some other form of storage device. The storage device should then be exhibited to a suitably prepared witness statement in the normal way.
- 6.3 When capturing evidence from an individual's public social media profile, steps should be taken to ensure that all relevant aspects of that evidence are recorded effectively. For example, when taking a screenshot of a person's social media profile, the officer doing so should make sure that the time and date are visible on the screenshot in order to prove when the evidence was captured. Likewise, if the evidence being captured is a specific status update or post published on the person's profile, steps should be taken to make sure that the date and time of that status update

or post is visible within the screenshot. Without this information, the effectiveness of the evidence is potentially lost as it may not be admissible in court.

- 6.4 Due to the nature of social media, there is a significant risk of collateral damage in the form of other innocent parties' information being inadvertently captured alongside that of the suspected offender's. When capturing evidence from a social media profile, steps should be taken to minimise this collateral damage either before capturing the evidence, or subsequently through redaction. This might be particularly prevalent on social media profiles promoting certain events, where users are encouraged to interact with each other by posting messages or on photographs where other users may be making comments.

7 General

- 7.1 Social media accounts must only be accessed on devices belonging to the Council. If there is a need to access an account on one not belonging to the council this must be discussed and approved in writing by your Manager. A log must be kept of the use social media in any investigation detailing the reasons why it was necessary to use it, the results found and any collateral damage to other parties. This must be approved by your Manager if it will be used in evidence.

Examples

1. An officer is suspected of undertaking additional employment in breach of their contract of employment. The HR department wish to look at the officer's social media accounts to find out if they show anything that to prove this is true. The officer has their profile set to public and HR only look at the accounts once. Such activity does not constitute directed surveillance for the purposes of the RIPA as the officer's profile is set to public and the accounts are only looked at once.
2. An officer claiming compensation for injuries allegedly sustained at work is suspected of fraudulently exaggerating the nature of those injuries. The officer's manager wishes to look at the officer's social media accounts to see if posts can prove or disprove the exaggeration of the claim. The manager is intending to monitor the accounts over a period of time. The account settings are public. The proposed surveillance is likely to result in the obtaining of private information and, as the alleged misconduct

amounts to the criminal offence of fraud, a directed surveillance RIPA authorisation must be considered. Full notes of the surveillance must be kept. If the officer then changes their account settings to private the Manager should not send a friend request to the officer but should discuss the next steps with their manager as there might be other ways of obtaining the required information.

3. Officers intend to commence proceedings for an injunction where there has been a breach of planning control. They do not know the current address of the proposed defendant. It is suggested that by looking at their social media accounts it might be possible to find out their current address. If it is likely that no criminal offence committed then RIPA cannot be used. RIPA cannot be used for civil action. It is unlikely that by looking at social media accounts the information required would be found. Other methods of obtaining the information should be used.
4. Officers seek to conduct directed surveillance against an individual on the grounds that this is necessary and proportionate for the collection of a tax as they have been claiming various housing and council tax rebates. They wish to monitor social media accounts on an ongoing basis to assist in the evidence gathering. The accounts have a public profile. Such surveillance could also result in the obtaining of some information about members of the individual's family, who are not the intended subjects of the surveillance. The authorising officer should consider the proportionality of this collateral intrusion, and whether sufficient measures are to be taken to limit it, when granting the authorisation. This may include not recording or retaining any material obtained through such collateral intrusion.

8 Related information

This document should be read in conjunction with the Council's Regulation of Investigatory Powers Act Policy & Procedure (available on the Council's website and Intranet) the Act itself:

<https://www.legislation.gov.uk/ukpga/2000/23/contents>

and the statutory Codes of Practice:

<https://www.gov.uk/government/collections/ripa-codes>

Further guidance may be found at the IPCO website:

<https://www.ipco.org.uk/>

CABINET

URN 23-175

Subject Fees and Charges 2024/25

Report to Cabinet - 29 January 2024

Report by: Financial Services Manager



SUBJECT MATTER/RECOMMENDATIONS

This report recommends for approval the schedule of fees and charges for the 2024/25 financial year which have been set in line with the fees and charges policy 2020/21 to 2024/25.

RECOMMENDATIONS

That Cabinet:

- 1) Approve the schedule of fees and charges for 2024/25 as detailed in appendix A of the report as per the fees and charges policy from 1 April 2024;
- 2) RECOMMEND TO COUNCIL approval of those fees and charges as detailed within Appendix B from 1 April 2024.

1. INTRODUCTION / BACKGROUND

- 1.1 The Council approved a fees and charges policy in December 2019 covering the period 2020/21 to 2024/25. This policy is part of the financial planning process within which the Council's fees and charges would be set annually. Income from fees and charges provides a key source of income to the Council for the provision of its services. The setting of the fees and charges for the 2024/25 will be final year in line with the current policy and therefore the policy will be refreshed ahead of the setting of the fees and charges for future budget setting processes.
- 1.2 Operating within a fees and charges policy provides a clear framework for setting the annual fees and charges for services provided by the Borough Council. There will be occasions when decisions around the setting of fees and charges need to be made that are outside of the policy, for example in response to local factors which influence demand for a service. There needs to be clear reasons for making changes outside of the policy and these would need to consider the longer-term income generation opportunities and overall impact to the financial position of the authority.
- 1.3 The setting of the fees and charges annually provides a key element of the annual budget setting process to inform the service income budgets which also consider local demand and other local factors. In addition, future financial projections will make assumptions on the level of planned increases to fees and charges in line with the current policy to provide

estimates on the level of future income that maybe achievable, although the impact of demand and other economic factors will be taken into account also.

- 1.4 The policy sets out some criteria and rationale for the annual changes to fees and charges which largely allow for the annual setting of charges to be set to ensure that they recover the cost of the service, increases of RPI only or RPI plus up to 2%, for the period until 2024/25. There are exceptions to this including the following:
- Where fees are statutory and are therefore outside the scope of control for the Council to set;
 - Where fees are set within national rules for cost recovery, for example land charges and building control.
- 1.5 Fees and charges set within the framework are reported to Cabinet for approval as part of the annual budget setting process, those that are outside of the frame will form a recommendation to Council as part of the later budget report.

2. FEES AND CHARGES PROPOSALS FOR 2024/25

- 2.1 The proposed fees and charges for 2024/25 are detailed at Appendix A to the report. All fees and charges have been reviewed by services and options for increases considered ranging from no increase to maximum increases in line with the policy of RPI plus upto 2%, RPI in September 2023 was 8.9%. The policy also allows for the recovery of costs for a service and therefore this has been taken into account when setting the charges for the coming year, for example the increased inflationary costs that the council is facing in the provision of the services provided and where fees have not been reviewed to reflect the current costs of delivery, a number of the fees have therefore increased above the RPI increases to reflect the cost recovery criteria of the policy. For administration purposes, the proposals will have been rounded, as applicable, for example where charges are reliant upon change such as car parking charges. As part of the review of fees and charges market forces are taken into account to ensure that fees still remain competitive where applicable so as not to impact on demand for services.
- 2.2 For 2024/25 most fees and charges set are within the policy within the above criteria, there are however a few exceptions which are detailed at Appendix B and cover a number of new fees and charges introduced across a number of services for operational and for consistency in the following areas, these will form recommendations to Council :
- 2.2.1 Customer Services – Car Parks and Crematoria
 - 2.2.2 Environmental Services – Administrative provision of replacement bins
 - 2.2.3 Planning – A review of the planning fees and charges has been undertaken to introduce a revised charging structure for pre-application, minor residential, medium residential, major residential and non residential.
 - 2.2.4 Events – New charges are being proposed for the charging of events on Council Car parks and council land as outlined within the appendix.

3. FINANCIAL IMPLICATIONS

- 3.1 The financial implications from the proposed changes have been factored into the detailed service budgets for 2024/25 and used to inform the future financial projections.

4. RISK IMPLICATIONS

- 4.1 There is a risk of non-delivery of budgeted income from the fees and charges for example as a result of a reduction in demand for a service, an element of this risk is mitigated by the informed calculation of the income budgets taking into account known local and national factors and also current and past trends.
- 4.2 Where the level of income is related to service demand there are factors that are outside of the control of the Council, for example the impact that weather can have on the level of car parking income, or confidence in the economy on planning application income. A prudent approach is taken to the setting of these income budgets and the more significant demand income budgets, for example car parking fee income and planning income are closely monitored during the year.
- 4.3 The level of income from fees and charges is reviewed during the year in terms of delivery of income targets as part of the budget monitoring process and therefore future charges could be subject to change to mitigate any financial risks.
- 4.4 The general reserve includes an allowance for fluctuations in income from demand led services which can be used to mitigate significant impacts during the year of reductions in income, although this should not be a long-term source of mitigation.

5. CONCLUSIONS

- 5.1 The proposed fees and charges for 2024/25 have been calculated based on the current fees and charges policy and also reflecting increased cost and inflationary pressures on the Council. The additional income will deliver help to mitigate some of the funding gap currently forecast and mitigate additional costs of service provision. The proposals have been factored into the detailed budget for 2024/25.

Consultations	Comment
Monitoring Officer Consultation:	ELT Consultation
Section 151 Officer Consultation:	Report Author
Existing Council Policies:	Fees and Charges Policy
Equality Issues/EQIA assessment:	Fee increases for non statutory services may not impact on specific protected characteristics, but will impact on those who have a low income, however those people will be directly affected by any increased cost of living.

Fees & Charges 2024/25

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Fee and Charges note

Generally any increase in fees and charges will take effect from 1st April 2024.
RPI for September 2023 is 8.9%

The prices quoted in this book are **inclusive of Value added Tax (VAT)** when VAT is applicable, therefore individuals and companies do not need to add VAT to the prices quoted. Please refer to the VAT code key below for further details.

VAT Code Key

Current standard rate of VAT is 20%

This schedule for fees and charges show the rate of VAT applicable which is denoted by

S - Standard Rated

EX - Exempt

OS - Outside scope

ZE - Zero rated

P - VAT to be added standard rated elements in packages.

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Cremation and Cemeteries						
Funeral Services						
Essential Rose package – Cremation only no service or attendance.	£1,295.00	£1,300.00	OS	£5.00	0.4%	
Essential Plus Rose package – Cremation and 15- minute service in the chapel with attendance (includes music choices). Service times 08:15, 16:00, 16:30 (price excludes VAT)	£1,995.00	£2,095.00	P	£100.00	5.0%	
Premium Rose package – Flexible cremation & 25- minute service in the chapel with attendance. Includes music choices. Service times: 09:15, 10:00, 11:30, 12:15, 13:00, 13:45, 14:30, 15:15. (price excludes VAT).	£2,495.00	£2,620.00	P	£125.00	5.0%	
Cremation Charges						
<i>The Fee Includes an Environmental Charge of £65</i>						
Non-viable foetus or still born child	No Charge	No Charge				
The body of a child of fours years, but not exceeding twelve years at the time of death.	No Charge	No Charge				
For Service times: 08:15, 08:45, 16:00 and 16:30 (30 minutes)	£899.00	£950.00	S	£51.00	5.7%	
For Service times 09:15, 10:00, 10:45, 11:30, 12:15, 13:00, 13:45, 14:30, 15:15 (45 minutes)	£995.00	£1,050.00	S	£55.00	5.5%	
Funeral Director No Attendance (arrangements required, no service) - delivery by agreement.						
Commercial operator rates available, please contact Bereavement Services Manager.	£525.00	£525.00	OS	£0.00	0.0%	
Commercial operators: please contact the Bereavement Services Manager for available rates						
<i>Saturday Services details on request</i>						
<i>50% cancellation fee will apply to cremations cancelled within 48hrs of the service</i>						
Additional Charges						
Scattering of cremated remains from this Crematorium in the lawn area, with relatives and an officer in attendance	£100.00	£105.00	OS	£5.00	5.0%	
Scattering of cremated remains from this Crematorium in the lawn area, no attendance	£70.00	£75.00	OS	£5.00	7.1%	
<u>Hire of Crematorium Chapel:</u>						
For Burial / Memorial Service	£200.00	£220.00	OS	£20.00	10.0%	
Extension of half an hour for Cremation Service	£225.00	£250.00	OS	£25.00	11.1%	*
Hire of Crematorium Chapel only	£310.00	£330.00	OS	£20.00	6.5%	
Temporary retention of ashes, after first four weeks, per month	£30.00	£34.00	OS	£4.00	13.3%	*
Bio-degradable box urn	No Charge	No Charge	OS			
Additional Certificate of Cremation	£28.00	£30.00	OS	£2.00	7.1%	
Pall bearers (each)	£35.00	£39.00	OS	£4.00	11.4%	*
Visual tributes						
Webcast	£85.00	£80.00	S	-\$5.00	-5.9%	decrease to encourage take up service
Downloadable recording MP4 Video File	£32.00	£32.00	S	£0.00	0.0%	
Downloadable recording MP4 Video File (Including video tribute)	£48.00	£48.00	S	£0.00	0.0%	
Recording DVD/USB	£67.00	£67.00	S	£0.00	0.0%	
Recording DVD/USB (including video tribute)	£72.00	£72.00	S	£0.00	0.0%	
Visual Tribute Single Still Image	£17.00	£18.00	S	£1.00	5.9%	
Visual Tribute slide show up to 25 images (no music)	£40.00	£40.00	S	£0.00	0.0%	
Visual Tribute slide for every 25 additional images (no music)	£28.00	£28.00	S	£0.00	0.0%	
Visual Tribute slide show up to 25 images (with music)	£84.00	£84.00	S	£0.00	0.0%	
Visual Tribute slide for every 25 additional images (with music)	£28.00	£28.00	S	£0.00	0.0%	
Visual Tribute Family Video File (not part of slide show)	£28.00	£30.00	S	£2.00	7.1%	
Visual Tribute Family Video File as part of slide show	£0.00	£20.00	S	£20.00	NEW	New Charge
Visual Tribute downloadable MP4 Video File	£21.00	£24.00	S	£3.00	14.3%	*
Visual Tribute DVD/USB	£32.00	£32.00	S	£0.00	0.0%	
Urgent Service Request	£100.00	£110.00	S	£10.00	10.0%	
Dedications						
Two-line entry	£96.00	£101.00	S	£5.00	5.2%	
Five-line entry	£330.00	£342.00	S	£7.00	5.2%	

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Cremation and Cemeteries						
Eight-line entry	£180.00	£200.00	S	£20.00	11.1%	*
Five-line entry with flower illustration or similar	£200.00	£220.00	S	£20.00	10.0%	
Five-line entry with heraldic device	£220.00	£235.00	S	£15.00	6.8%	
Eight-line entry with flower illustration or similar	£220.00	£235.00	S	£15.00	6.8%	
Eight-line entry with full heraldic device or crest	£390.00	£390.00	S	£0.00	0.0%	
Memorial Cards						
Two Line entry	£53.00	£53.00	S	£0.00	0.0%	
Five-line entry	£63.00	£70.00	S	£7.00	11.1%	*
Eight-line entry	£84.00	£90.00	S	£6.00	7.1%	
Five-line entry with flower illustration or similar	£130.00	£175.00	S	£45.00	34.6%	*
Eight-line entry with flower illustration or similar	£160.00	£205.00	S	£45.00	28.1%	*
Five-line entry with heraldic device	£180.00	£220.00	S	£40.00	22.2%	*
Eight-line entry with full heraldic device or crest	£190.00	£240.00	S	£50.00	26.3%	*
Memory Books						
Two Line entry	£79.00	£85.00	S	£6.00	7.6%	
Five-line entry	£87.00	£100.00	S	£13.00	14.9%	*
Eight-line entry	£98.00	£120.00	S	£22.00	22.4%	*
Five-line entry with flower illustration or similar	£155.00	£200.00	S	£45.00	29.0%	*
Eight-line entry with flower illustration or similar	£170.00	£215.00	S	£45.00	26.5%	*
Five-line entry with heraldic device	£160.00	£205.00	S	£45.00	28.1%	*
Eight-line entry with full heraldic device	£175.00	£250.00	S	£75.00	42.9%	*
<i>NB: For each additional entry in Velum book - as in Memorial Cards above inclusive of postage and packing</i>						
Memorial Garden (including provision of Bronze Plaque Ten Year dedication period for plaque)						
Shrub	£310.00	£326.00	S	£16.00	5.2%	
Standard Ornamental Shrub	£360.00	£378.00	S	£18.00	5.0%	
Double Plaque (to replace single)	£80.00	£100.00	S	£20.00	25.0%	*
Embossed motif (from selection) on bronze plaque	£21.00	£24.00	S	£3.00	14.3%	*
Postage & packaging of expired memorial plaque	£10.00	£12.00	S	£2.00	20.0%	*
Memorial Garden (including provision of Bronze Plaque Five Year dedication period for plaque)						
Shrub	£185.00	£195.00	S	£10.00	5.4%	
Standard Ornamental Shrub	£215.00	£226.00	S	£11.00	5.1%	
Double Plaque (to replace single)	£80.00	£100.00	S	£20.00	25.0%	*
Embossed motif (from selection) on bronze plaque	£21.00	£24.00	S	£3.00	14.3%	*
Postage & packaging of expired memorial plaque	£10.00	£12.00	S	£2.00	20.0%	*
Memorial Tree (including provision of Bronze Plaque) Ten Year dedication period.						
Ten-year dedication period	£505.00	£560.00	S	£55.00	10.9%	
Renewal – Ten-year dedication period	£300.00	£327.00	S	£27.00	9.0%	
Individual Memorial Seat (including provision of Bronze Plaque) Ten Year dedication period.						
Six-foot seat	£1,370.00	£1,520.00	S	£150.00	10.9%	
Additional bronze plaque	£240.00	£252.00	S	£12.00	5.0%	
Renewal for ten-year dedication period	£630.00	£687.00	S	£57.00	9.0%	
Individual Wall Plaques. Ten Year dedication period.						
Bronze plaque - black with gold lettering	£190.00	£200.00	S	£10.00	5.3%	
Renewal of existing plaque - ten-year dedication period	£130.00	£145.00	S	£15.00	11.5%	*
To add additional name or request new plaque to replace existing (new 4-line plaque)	£95.00	£100.00	S	£5.00	5.3%	
Polished Sterling Grey Granite Memorial Vase Kerbs. Ten Year dedication period.						
Granite Memorial Vase Kerbs with 6-line inscription	£490.00	£550.00	S	£60.00	12.2%	*
Renewal – ten-year dedication period	£375.00	£420.00	S	£45.00	12.0%	*
Hexagonal Sandstone Tower with Granite Plaque. Ten Year dedication period.						
Granite memorial plaque with 6-line inscription	£195.00	£217.00	S	£22.00	11.3%	*
Renewal of existing plaque for ten-year period	£135.00	£150.00	S	£15.00	11.1%	*
Sanctum 2000 above ground vaults.						
Twenty - year lease of granite vault and black granite plaque and lettering (up to 80 letters) first interment and first posy vase	£1,240.00	£1,400.00	S	£160.00	12.9%	*
<i>Decorative motifs/floral tribute on plaque (samples & price on request)</i>						

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Cremation and Cemeteries						
Cameo photograph arranged and fixed to plaque (4cm x 3cm) (samples & price on request)	£140.00	Price on request	S	n/a	n/a	
Cameo photograph arranged and fixed to plaque (7cm x 5cm) (samples & price on request)	£170.00	Price on request	S	n/a	n/a	
Heart shaped cameo photo, arranged and fixed to plaque	£225.00	Price on request	S	n/a	n/a	
Replacement of black granite plaque (excluding photograph) up to 80 letters (samples & price on request)	£450.00	Price on request	S	n/a	n/a	
Additional letters (per letter)	£5.00	£6.00	S	£1.00	20.0%	*
<i>Repainting of current plaque price on request (dependent on characters and motifs)</i>						
Buxton Bench. Twenty-year lease period						
Twenty- year lease Granite bench with two recesses for plaque, including one 7' x 5' engraved memorial plaque	£1,000.00	£1,100.00	S	£100.00	10.0%	
Second plaque	£140.00	£190.00	S	£50.00	35.7%	*
Ornamental Memorial Tree in Garden of Remembrance						
Ornamental tree with plaque including inscription and motif, on a twenty- year lease	£740.00	£806.00	S	£66.00	8.9%	
Cemetery Charges						
Interment Charges						
The following charges relate to burial of persons resident within the Borough area at the time of death:						
The body of a child whose age at the time of death did not exceed twelve years	No Charge	No Charge				
The body of a person whose age at the time of death exceeded twelve years	£965.00	£1,080.00	OS	£115.00	11.9%	*
The following charges relate to the burial of persons who are not resident within the Borough are:						
The body of a stillborn child or child whose age at the time of death did not exceed one month	£150.00	£167.00	OS	£17.00	11.3%	*
The body of a child whose age at the time of death exceeded one month, but did not exceed twelve years	£195.00	£217.00	OS	£22.00	11.3%	*
The body of a person whose age at the time of death exceeded twelve years	£1,365.00	£1,514.00	OS	£149.00	10.9%	
Additional Charges						
Excavation for 9' x 4' walled graves (not including construction of walls)	£245.00	£272.00	OS	£27.00	11.0%	*
<i>Larger excavations - prices upon request</i>						
For burial at 3pm or after	£80.00	£90.00	OS	£10.00	12.5%	*
Interment of cremated remains						
In a grave for which Exclusive Right of Burial has been granted						
The body of a child not exceeding four years of age at the time of death	£62.00	£69.00	OS	£7.00	11.3%	*
The body of a child of four years but not exceeding twelve years at the time of death	£73.00	£81.00	OS	£8.00	11.0%	*
The body of a person whose age at the time of death exceeded twelve years (resident)	£290.00	£320.00	OS	£30.00	10.3%	
The body of a person whose age at the time of death exceeded twelve years (non-resident interred into new grave)	£485.00	£538.00	OS	£53.00	10.9%	
The body of a person whose age at the time of death exceeded twelve years (non-resident interred into occupied grave)	£290.00	£320.00	OS	£30.00	10.3%	
Double interment of cremated remains (resident)	£310.00	£335.00	OS	£25.00	8.1%	
Double interment of cremated remains (non- resident interred into occupied grave)	£310.00	£335.00	OS	£25.00	8.1%	

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
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Cremation and Cemeteries

In a grave for which Exclusive Right of Burial has been granted

Internment of single set of cremated remains (including plaque)	£315.00	£331.00	OS	£16.00	5.1%	
Internment of double set of cremated remains (additional £100 for addition/change plaque)	£525.00	£552.00	OS	£27.00	5.1%	

Exhumation Charges

Exhumation of body of any age	£2,340.00	£2,596.00	EX/S	£256.00	10.9%	
Exhumation of cremated remains	£325.00	£361.00	EX/S	£36.00	11.1%	*

Reinternment Charges

Charges for each reinternment in accordance with normal fees

Purchase of Exclusive Right of Burial - 50 years

Purchase by resident of the Borough:

(Temporary memorial free upon request for the first internment)

Earthen grave 9'x4'	£890.00	£988.00	EX	£98.00	11.0%	*
Earthen grave 2'x2' (ashes)	£600.00	£666.00	EX	£66.00	11.0%	*
Earthen grave 4'x2' (Child up to age of four)	£185.00	£206.00	EX	£21.00	11.4%	*

Purchase by non-resident of the Borough:

(Temporary memorial free upon request for the first internment)

Earthen grave 9'x4'	£1,495.00	£1,658.00	EX	£163.00	10.9%	
Earthen grave 2'x2' (ashes)	£1,000.00	£1,109.00	EX	£109.00	10.9%	
Earthen grave 4'x2' (Child up to age of four)	£190.00	£211.00	EX	£21.00	11.1%	*
Temporary memorial (including carriage)	£80.00	£84.00	S	£4.00	5.0%	

Monuments and Gravestones

From 1st April 2020 there will be an administration charge for the permission to erect a memorial on all plots in all cemeteries.

	£105.00	£105.00	S	£0.00	0.0%	
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Where the Exclusive Right of Burial was purchased before 1st April 1989, a monument fee of £90.00 shall be paid.

On safety grounds, no memorial constructed of wood, glass, china or plastic material, except for the approved design for temporary memorials issued by the Council, shall be placed on any grave and all

Supplementary charges

Search Fee for Burial Registers (excluding genealogy enquiries) (per entry)	£49.00	£55.00	OS	£6.00	12.2%	*
Indemnity Form (where owner is unable to produce original purchase Deed)	£28.00	£30.00	OS	£2.00	7.1%	
Fee for transfer of Deed of Exclusive Right	£50.00	£55.00	OS	£5.00	10.0%	
Fee for transfer of Deed of Exclusive Right (Deed not available)	£80.00	£85.00	OS	£5.00	6.3%	
Genealogy enquires per hour or part thereof	£52.00	£58.00	S	£6.00	11.5%	*
Administrative Fee (for preparation/production/amended/duplication of paperwork) (NB - fee non-refundable, if after search grave is not located)	£28.00	£30.00	S	£2.00	7.1%	

Dedications

Memorial Benches (including provision of plaque)

Ten Year dedication period	£1,365.00	£1,514.00	S	£149.00	10.9%	
Additional Plaque	£240.00	£267.00	S	£27.00	11.3%	*
Dedication Posy Vase	£75.00	£84.00	S	£9.00	12.0%	*
Return of memorial Plaque	£10.00	£12.00	S	£2.00	20.0%	*

Garden Memorials (including provision of plaque)

Memorial Rose with ten-year dedication period	£385.00	£420.00	S	£35.00	9.1%	
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Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Cremation and Cemeteries						
Memorial shrub with ten-year dedication period	£330.00	£360.00	S	£30.00	9.1%	
Memorial tree with ten-year dedication period	£510.00	£560.00	S	£50.00	9.8%	
Return of memorial plaque	£10.00	£12.00	S	£2.00	20.0%	*
Open Space Dedications						
Ten Year Dedication Plaque (no bench)	£245.00	£272.00	S	£27.00	11.0%	*
Dedication Posy Vase	£75.00	£84.00	S	£9.00	12.0%	*
Return of Dedication Plaque	£10.00	£12.00	S	£2.00	20.0%	*

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
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Pay & Display Car Parks

Town Centre Car Parks

King Street, Market Place & Howard Street Car Park

Monday to Saturday						
Up to 30 mins	£0.80	£0.90	S	£0.10	12.5%	*
Up to 90 mins	£1.50	£1.60	S	£0.10	6.7%	
Up to 2 hrs	£2.20	£2.20	S	£0.00	0.0%	
Up to 3 hrs	£3.20	£3.20	S	£0.00	0.0%	
Up to 4 hrs	£4.20	£4.20	S	£0.00	0.0%	
Over 4 hrs	£8.00	£8.00	S	£0.00	0.0%	
Free after 4pm						
Sunday						
Up to 30 mins	£0.80	£0.90	S	£0.10	12.5%	*
Up to 90 mins	£1.50	£1.60	S	£0.10	6.7%	
Up to 2 hrs	£2.20	£2.20	S	£0.00	0.0%	
Up to 3 hrs	£3.20	£3.20	S	£0.00	0.0%	
Up to 4 hrs & over	£4.20	£4.20	S	£0.00	0.0%	

Stonecutters, George Street, Brewery Plain, Greyfriars

Monday to Saturday						
Up to 90 mins	£1.50	£1.60	S	£0.10	6.7%	
Up to 2 hrs	£2.20	£2.20	S	£0.00	0.0%	
Up to 3 hrs	£3.20	£3.20	S	£0.00	0.0%	
Up to 4 hrs	£4.20	£4.20	S	£0.00	0.0%	
Over 4 hrs	£8.00	£8.00	S	£0.00	0.0%	
Free after 4pm						
Wednesday 12pm to 8am (King Street, George Street & Brewery Plain.	Free	Free				
Sunday						
Up to 90 mins	£1.50	£1.60	S	£0.10	6.7%	
Up to 2 hrs	£2.20	£2.20	S	£0.00	0.0%	
Up to 3 hrs	£3.20	£3.20	S	£0.00	0.0%	
Up to 4 hrs & over	£4.20	£4.20	S	£0.00	0.0%	

Fullers Hill Car Park

Monday to Saturday						
Up to 90 mins	£1.50	£1.60	S	£0.10	6.7%	
Up to 2 hrs	£2.20	£2.20	S	£0.00	0.0%	
Up to 3 hrs	£3.20	£3.20	S	£0.00	0.0%	
Up to 4 hrs	£4.20	£4.20	S	£0.00	0.0%	
Over 4 hrs	£6.00	£6.60	S	£0.60	10.0%	
Free after 4pm						
Sunday						
Up to 90 mins	£1.50	£1.60	S	£0.10	6.7%	
Up to 2 hrs	£2.20	£2.20	S	£0.00	0.0%	
Up to 3 hrs	£3.20	£3.20	S	£0.00	0.0%	
Up to 4 hrs & over	£4.20	£4.20	S	£0.00	0.0%	

Blackfriars Car Park

Monday to Sunday (8am to 9pm)						
Up to 90 mins	£1.50	£1.60	S	£0.10	6.7%	
Up to 2 hrs	£2.20	£2.20	S	£0.00	0.0%	
Up to 3 hrs	£3.20	£3.20	S	£0.00	0.0%	
Up to 4 hrs	£4.20	£4.20	S	£0.00	0.0%	
Cost per hr thereafter	£1.00	£1.00	S	£0.00	0.0%	
Overnight (9pm to 8am)	Free		S			

Middlegate Car Park

Monday to Sunday (8am to 9pm)	£1.20	£1.50	S	£0.30	25.0%	Above policy to bring in line with others
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Seafront Car Parks - Long Stay

St Nicholas & North Drive.

Closed in Winter (Apart form special events)						
Up to 4 hours (1 March to 31 October inclusive)	£6.80	£6.90	S	£0.10	1.5%	
Over 4 hours (1 March to 31 October inclusive)	£10.50	£10.60	S	£0.10	1.0%	
Daily Rate 1st November to end of February (Special events)	£5.00	£5.60	S	£0.60	12.0%	*

Seafront Car Parks - Short Stay

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Pay & Display Car Parks						
Euston Road, Anchor Gardens, Jetty North, Jetty South.						
Summer - Cost per hour, first 2 hours	£2.80	£3.00	S	£0.20	7.1%	
Summer - Cost per hour, after 2 hours	£3.80	£3.80	S	£0.00	0.0%	
Winter - Cost per hour	£1.50	£1.50	S	£0.00	0.0%	
Overnight (9pm to 8am) Free when EV charge point in use.	£1.50	£1.50	S	£0.00	0.0%	
Leisure Centre						
6am to 10pm 7 days per week all year						
Leisure centre members free to park max stay 3 hours						
Leisure centre casual users free to park max stay 3 hrs (certain conditions apply requiring minimum spend for facilities)						
Up to 3 hours	£11.40	£12.00	S	£0.60	5.3%	
Cost per hour over 3 hrs	£3.50	£3.50	S	£0.00	0.0%	
Overnight (10pm to 6am) Free from 9pm to 6am when EV charge point in use.	£1.50	£1.50	S	£0.00	0.0%	
Other Car Parks						
Gorleston High Street						
90 minutes (8am - 4pm)	n/a	£1.60	S	NEW	NEW	New
2 hrs	n/a	£2.20	S	NEW	NEW	New
Hourly rate thereafter	£1.20	£1.00	S	-£0.20	-16.7%	in line with above new fees
Sunday's hourly rate £1.20. (Maximum £4.20 per day)	£1.20	£1.20	S	£0.00	0.0%	
Resident passes per quarter	£23.50	£24.70	S	£1.20	5.1%	
Caister						
Summer - cost per hour or part thereof	£1.20	£1.40	S	£0.20	16.7%	*
Winter - cost per hour or part thereof	Free	Free	S			
Resident passes per quarter	£23.50	£24.70	S	£1.20	5.1%	
Beach Coach Station						
Cars						
Summer - peak tariff up to 4 hours (1 April to 31 October)	£6.20	£6.50	S	£0.30	4.8%	
Summer - peak tariff over 4 hours (1 April to 31 October)	£9.50	£10.00	S	£0.50	5.3%	
Winter - per day	£2.80	£3.00	S	£0.20	7.1%	
Overnight (9pm to 8am) (Free when EV charge point in use).	£1.50	£1.50	S	£0.00	0.0%	
Coaches						
All year - bay fee up to 3 hours	£6.80	£7.50	S	£0.70	10.3%	
All year - daily ticket	£12.00	£13.00	S	£1.00	8.3%	
All year - weekly ticket	£62.00	£66.00	S	£4.00	6.5%	
Lorry's						
All year - per twelve-hour period	£18.00	£20.00	S	£2.00	11.1%	*
Solo Motorcycles and Scooter						
In designated area only	No Charge	No Charge				
Other Charges:						
Season Tickets						
Season Ticket Fullers Hill (Monday to Friday only) and Beach Coach Station per month	£41.00	£45.00	S	£4.00	9.8%	
Season Ticket (excluding Palmers) Town Centre short stay and Gorleston High Street CP, Beach Road CP Caister (St Nicholas & North Drive Long Stay Summer only)	£69.00	£72.00	S	£3.00	4.3%	
Reserved bays (Seafront) per Annum	£650.00	£680.00	S	£30.00	4.6%	
Reserved Bays (Seafront) Summer only (1st April to 31st Oct)	£400.00	£415.00	S	£15.00	3.8%	
Rover Tickets						
Weekly	£37.00	£40.30	S	£3.30	8.9%	
Three day (72 hours) (Any three days)	£16.00	£17.50	S	£1.50	9.4%	
Market Traders						
Fullers Hill Car Park (per annum)	£65.00	£71.00	S	£6.00	9.2%	
Private Car Park Bays GYBC Land						
High Mill Road (per annum)	£100.00	£105.00	S	£5.00	5.0%	
All others (per annum)	£189.00	£200.00	S	£11.00	5.8%	
Penalty Charge Notices (1)						
Payment received within 14 days	£35.00	£35.00	S	£0.00	0.0%	
Payment received after 14 days	£70.00	£70.00	S	£0.00	0.0%	

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Pay & Display Car Parks						
Penalty Charge Notices (2)						
Payment received within 14 days	£25.00	£25.00	S	£0.00	0.0%	
Payment received after 14 days	£50.00	£50.00	S	£0.00	0.0%	
Resident Advantage Card						
Advantage Card available to residents only	£4.00	£4.20	S	£0.20	5.0%	

Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change
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Local Authority Permits for Part B installations

PLEASE NOTE: The following fees have been prescribed by the Government.

At the time of publishing these Fees and Charges 2024/25 have not been published and are stated at the 2023/24 charge.

Mobile plant and Solvent Emission Activities

Application fees

Standard Process	£1,650.00	£1,650.00	OS	£0.00	0.00%
Additional fee for operating without a permit	£1,188.00	£1,188.00	OS	£0.00	0.00%
Reduced fee activities (except VRs)	£155.00	£155.00	OS	£0.00	0.00%
PVR I & II combined	£257.00	£257.00	OS	£0.00	0.00%
Vehicle refinishers (VRs)	£362.00	£362.00	OS	£0.00	0.00%
Reduced fee activities: Additional fee for operating without a permit	£71.00	£71.00	OS	£0.00	0.00%
Mobile screening and crushing plant	£1,650.00	£1,650.00	OS	£0.00	0.00%
for the third to seventh application	£985.00	£985.00	OS	£0.00	0.00%
for the eighth and subsequent applications	£498.00	£498.00	OS	£0.00	0.00%
Where an application for any of the above is for a combined Part B and waste application, add an extra £279 to the above amounts	£279.00	£279.00	OS	£0.00	0.00%

Annual Subsistence Charge

Standard Process

Low	£772 (+£104)*	£772 (+£104)*	OS		
Medium	£1,161(+£156)*	£1,161(+£156)*	OS		
High	£1,747(+£207)*	£1,747(+£207)*	OS		

Reduced fee activities:

Low	£79.00	£79.00	OS	£0.00	0.00%
Medium	£158.00	£158.00	OS	£0.00	0.00%
High	£237.00	£237.00	OS	£0.00	0.00%

PVR I & II combined:

Low	£113.00	£113.00	OS	£0.00	0.00%
Medium	£226.00	£226.00	OS	£0.00	0.00%
High	£341.00	£341.00	OS	£0.00	0.00%

Vehicle refinishers

Low	£228.00	£228.00	OS	£0.00	0.00%
Medium	£365.00	£365.00	OS	£0.00	0.00%
High	£548.00	£548.00	OS	£0.00	0.00%

Mobile screening and crushing plant:

for first and second permits

Low	£626.00	£626.00	OS	£0.00	0.00%
Medium	£1,034.00	£1,034.00	OS	£0.00	0.00%
High	£1,551.00	£1,551.00	OS	£0.00	0.00%

for the third to seventh permits

Low	£385.00	£385.00	OS	£0.00	0.00%
Medium	£617.00	£617.00	OS	£0.00	0.00%
High	£924.00	£924.00	OS	£0.00	0.00%

eighth and subsequent permits

Low	£198.00	£198.00	OS	£0.00	0.00%
Medium	£314.00	£314.00	OS	£0.00	0.00%
High	£473.00	£473.00	OS	£0.00	0.00%

Late payment Fee	£52.00	£52.00	OS	£0.00	0.00%
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* the additional amounts in brackets must be charged where a permit is for a combined Part B and waste installation. Where a Part B installation is subject to reporting under the E-PRTR Regulation, add an extra £104 to the above amounts

Transfer and Surrender

Standard process transfer	£169.00	£169.00	OS	£0.00	0.00%
Standard process partial transfer	£497.00	£497.00	OS	£0.00	0.00%
New operator at low risk reduced fee activity	£53.00	£53.00	OS	£0.00	0.00%

Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change
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Local Authority Permits for Part B installations

Surrender: all Part B activities	£0.00	£0.00	OS	£0.00	#DIV/0!
Reduced fee activities: transfer	£0.00	£0.00	OS	£0.00	#DIV/0!
Reduced fee activities: partial transfer	£47.00	£47.00	OS	£0.00	0.00%

Temporary transfer for mobiles

First transfer	£51.00	£51.00	OS	£0.00	0.00%
Repeat following enforcement or warning	£51.00	£51.00	OS	£0.00	0.00%

Substantial change

Standard process	£1,050.00	£1,050.00	OS	£0.00	0.00%
Standard process where the substantial change results in a new PPC activity	£1,650.00	£1,650.00	OS	£0.00	0.00%
Reduced fee activities	£102.00	£102.00	OS	£0.00	0.00%

LAPPC mobile plant charges

Number of Permits	Low Subsistence /Medium Susbsistence				
1	£1034.00/ £1551.00	£1034.00/ £1551.00	OS	£0.00	0.00%
2	£1034.00/ £1551.00	£1034.00/ £1551.00	OS	£0.00	0.00%
3	£617.00/ £924.00	£617.00/ £924.00	OS	£0.00	0.00%
4	£617.00/ £924.00	£617.00/ £924.00	OS	£0.00	0.00%
5	£617.00/ £924.00	£617.00/ £924.00	OS	£0.00	0.00%
6	£617.00/ £924.00	£617.00/ £924.00	OS	£0.00	0.00%
7	£617.00/ £924.00	£617.00/ £924.00	OS	£0.00	0.00%
8 and over	£314.00/ £473.00	£314.00/ £473.00	OS	£0.00	0.00%

LA-IPPC charges

NB - every subsistence charge in the table below includes the additional £104 charge to cover LA extra costs in dealing with reporting under the E-PRTR Regulation

Type of Charge	Local Authority element				
Application	£3,363.00	£3,363.00	OS	£0.00	0.00%
Additional fee for operating without a permit	£1,188.00	£1,188.00	OS	£0.00	0.00%
Annual Subsistence Low	£1,446.00	£1,446.00	OS	£0.00	0.00%
Annual Subsistence Medium	£1,610.00	£1,610.00	OS	£0.00	0.00%
Annual Subsistence High	£2,333.00	£2,333.00	OS	£0.00	0.00%
Subsistence Variation	£1,368.00	£1,368.00	OS	£0.00	0.00%
Transfer	£235.00	£235.00	OS	£0.00	0.00%
Partial Transfer	£698.00	£698.00	OS	£0.00	0.00%
Surrender	£698.00	£698.00	OS	£0.00	0.00%

Subsistence charges can be paid in four equal quarterly instalments paid on 1st April, 1st July, 1st October and 1st January. Where paid quarterly the total amount payable to the local authority will be increased by £38.

Reduced fee activities are; Service Stations, Vehicle Refinishers, Dry Cleaners and Small Waste Oil Burners under 0.4MW.

Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change
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Local Authority Permits for Part B installations

Newspaper advertisements
Newspaper adverts may be required under EPR at the discretion of the LA as part of the consultation process when considering an application (see Chapter 9 of the General Guidance Manual). This will be undertaken and paid for by the LA and the charging scheme contains a provision for the LA to recoup its costs.

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% change	Notes
Local Licenses						
Skin Piercing and Tattooists (business registration)	£275.00	£305.00	OS	£30.00	10.9%	
Skin Piercing (registration personal licence)	£80.00	£100.00	OS	£20.00	25.0%	*
Variation to Personal Licence	£40.00	£45.00	OS	£5.00	12.5%	*
Amendment to premises schedule	£40.00	£45.00	OS	£5.00	12.5%	*
Animals (Vet charges are recoverable)						
<u>Pet Shop/Sale of pets</u>						
Application Fee	£190.00	£360.00	OS	£170.00	89.5%	*
Grant Fee	£120.00	£178.00	OS	£58.00	48.3%	*
<u>Riding Establishment</u>						
Application Fee	£255.00	£360.00	OS	£105.00	41.2%	*
Grant Fee	£120.00	£175.00	OS	£55.00	45.8%	*
<u>Dog Breeding</u>						
Application Fee	£255.00	£360.00	OS	£105.00	41.2%	*
Grant Fee	£120.00	£175.00	OS	£55.00	45.8%	*
<u>Animal boarding including, dogs, cats, home boarding and doggy day care</u>						
Application Fee	£190.00	£360.00	OS	£170.00	89.5%	*
Grant Fee	£120.00	£175.00	OS	£55.00	45.8%	*
Dangerous Wild Animals (Biennial)	£269.00	£335.00	OS	£66.00	24.5%	*
<u>Keeping animals for exhibition</u>						
Application Fee	£160.00	£335.00	OS	£175.00	109.4%	*
3 year licence	£160.00	£175.00	OS	£15.00	9.4%	
Combination of activities - in addition to highest activity fee (vets fees where required)	£52.00	£60.00	OS	£8.00	15.4%	*
Variation to Licence/re-evaluation of rating for animal boarding, pet shops and keeping animals for exhibition	£100.00	£120.00	OS	£20.00	20.0%	*
Variation to Licence/re-evaluation of rating including breeding and riding activities (plus vet fees)	£100.00	£120.00	OS	£20.00	20.0%	*
Variations to reduce the licensable activities or numbers of animals	£55.00	£60.00	OS	£5.00	9.1%	
Transfer of Licence (on death of Licence holder)	£55.00	£60.00	OS	£5.00	9.1%	
Change of name or business name (not transfer)	£32.00	£35.00	OS	£3.00	9.4%	
Copy of Licence	£14.00	£15.00	OS	£1.00	7.1%	
Zoo (Vet charges are recoverable in addition to these fees)						
Notice of intention to apply for a Zoo Licence	£135.00	£150.00	OS	£15.00	11.1%	*
Application	£300.00	£430.00	OS	£130.00	43.3%	*
Grant	£135.00	£175.00	OS	£40.00	29.6%	*
Renewal	£430.00	£605.00	OS	£175.00	40.7%	*
Special Inspection	£135.00	£150.00	OS	£15.00	11.1%	*
Periodic inspections (3 yr)	£230.00	£256.00	OS	£26.00	11.3%	*
Informal Inspections (annual)	£200.00	£222.00	OS	£22.00	11.0%	*
Advice (hourly rate)	£65.00	£65.00	OS	£0.00	0.0%	
Food/Water Samples						
PWS risk assessment (large/commercial supply)	£235.00	£261.00	OS	£26.00	11.1%	*
PWS risk assessment (small supply)	£120.00	£134.00	OS	£14.00	11.7%	*
PWS risk assessment (single domestic dwelling)	£60.00	£67.00	OS	£7.00	11.7%	*
PWS sampling (plus analysis costs)	£60.00	£67.00	OS	£7.00	11.7%	*
PWS investigation (plus analysis costs)	£60.00	£67.00	OS	£7.00	11.7%	*
Commercial Health Certificates						
Health Attestation Certificate	£19.00	£25.00	OS	£6.00	31.6%	*
Food Premises Register						
Confirmation of entry	£17.00	£20.00	OS	£3.00	17.6%	*
Copy of register	£974.00	£974.00	OS	£0.00	0.0%	

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% change	Notes
Local Licenses						
House in Multiple Occupation Licence						
House in Multiple Occupation Licence - Part A (application)	£735.00	£816.00	OS	£81.00	11.0%	*
House in Multiple Occupation Licence - Part B (granting/scheme enforcement)	£335.00	£372.00	OS	£37.00	11.0%	*
Units of accommodation:						
Each Additional Unit at	£34.00	£38.00	OS	£4.00	11.8%	*
House in Multiple Occupation Renewal of Licence - Standard 5	£730.00	£810.00	OS	£80.00	11.0%	*
Mid Term Administration and inspection	£335.00	£372.00	OS	£37.00	11.0%	*
Units of accommodation:						
Each Additional Unit at	£33.00	£38.00	OS	£5.00	15.2%	*
Variation of a Licence	£33.00	£38.00	OS	£5.00	15.2%	*
Housing Act 2004						
Recovery of costs re Enforcement Notices	£440.00	£488.00	OS	£48.00	10.9%	
Failure to provide smoke alarms	£5,000.00	£5,000.00	OS	£0.00	0.0%	
Failure to provide carbon monoxide alarms	£5,000.00	£5,000.00	OS	£0.00	0.0%	
Immigration Inspections Std (10days)	£115.00	£130.00	OS	£15.00	13.0%	*
Immigration Inspections fast Track (5days)	£170.00	£190.00	OS	£20.00	11.8%	*
Scrap Metal Dealer Licence Fees						
Site Licence						
New	£365.00	£470.00	OS	£105.00	28.8%	*
Renewal	£365.00	£470.00	OS	£105.00	28.8%	*
Variation	£150.00	£167.00	OS	£17.00	11.3%	*
Scrap Metal Dealer Licence Fees						
Collectors Licence	£215.00	£235.00	OS	£20.00	9.3%	
Copy of Licence	£12.00	£15.00	OS	£3.00	25.0%	*
Public Health Act Funerals						
Administration and Officer rate - flat fee	£610.00	£677.00	OS	£67.00	11.0%	*
Out of Borough Excess Cost Recovery	£70.00	£78.00	OS	£8.00	11.4%	*
Dog Warden - Fees						
Contractors Fee for Collection and Kenneling per dog (Recharges include VAT)	Cost Recovery		OS			
Statutory Fee	£25.00	£25.00	OS	£0.00	0.0%	
Ship Sanitation Charges						
These fees are set by the Association of Port Health Authorities - prices are subject to change and the prescribed charges will be adopted.						
Gross Tonnage Charge (£)						
Below 1,001	£125.00	£125.00	S	£0.00	0.0%	
From 1,001 to 3,000	£170.00	£170.00	S	£0.00	0.0%	
3,001 - 10,000	£250.00	£250.00	S	£0.00	0.0%	
10,001 - 20,000	£325.00	£325.00	S	£0.00	0.0%	
20,001 - 30,000	£415.00	£415.00	S	£0.00	0.0%	
Over 30,000	£480.00	£480.00	S	£0.00	0.0%	
With the exception of:						
Vessels with the capacity to carry between 50 and 1,000 persons	£480.00	£480.00	S	£0.00	0.0%	
Vessels with the capacity to carry more than 1,000 persons	£820.00	£820.00	S	£0.00	0.0%	
Over 1,000 persons Extensions	£95.00	£95.00	S	£0.00	0.0%	
Extra charges may be added for exceptional costs such as launch hire, lengthy journeys to the port or laboratories, out of hour visits and samples taken.						
Mobile Homes Act 2013						
Costs of New Application						
1-5 pitches	£290.00	£322.00	OS	£32.00	11.0%	*
6-24 pitches	£310.00	£344.00	OS	£34.00	11.0%	*
25-99 pitches	£330.00	£366.00	OS	£36.00	10.9%	
100+ pitches	£370.00	£411.00	OS	£41.00	11.1%	*
Inspection Fee						
1-5 pitches	£170.00	£189.00	OS	£19.00	11.2%	*
6-24 pitches	£250.00	£278.00	OS	£28.00	11.2%	*
25-99 pitches	£330.00	£366.00	OS	£36.00	10.9%	
100+ pitches	£370.00	£411.00	OS	£41.00	11.1%	*

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% change	Notes
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Local Licenses

Food Hygiene Inspections

Food hygiene re-rating inspection	£190.00	£211.00	OS	£21.00	11.1%	*
Food mentoring visit (Maximum 2 hours)	n/a	£150.00	OS	NEW	NEW	New
Voluntary surrender of food stuffs (disposal costs charged at cost in addition to this fee)	£205.00	£228.00	OS	£23.00	11.2%	*

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% change	Notes
Garden Waste & Bulky Items						
Garden Waste Bins & Bags						
New bins (including charge for collections)						
One Bin	£79.00	£90.00	OS	£11.00	13.9%	*
Two Bins	£130.50	£145.00	OS	£14.50	11.1%	*
Three Bins	£182.00	£200.00	OS	£18.00	9.9%	
Four Bins	£233.50	£260.00	OS	£26.50	11.3%	*
Renewal of Annual Bin (including charge for collections)						
One Bin	£55.00	£65.00	OS	£10.00	18.2%	*
Two Bins	£82.00	£98.00	OS	£16.00	19.5%	*
Three Bins	£110.00	£130.00	OS	£20.00	18.2%	*
Four Bins	£137.00	£163.00	OS	£26.00	19.0%	*
Other Charges						
One off/Additional Bin empty (single bin)	£23.00	£25.00	OS	£2.00	8.7%	
One off/Additional Bin empty (2 bins)	£23.00	£40.00	OS	£17.00	73.9%	*
12 bags	£28.00	£32.00	OS	£4.00	14.3%	*
24 bags	£53.00	£60.00	OS	£7.00	13.2%	*
Administration charge - Provision of new bins or replacement bins (set of 2)	£69.00	£75.00	OS	£6.00	8.7%	
Administration charge - Replacement/extra recycling or residual bin (single bin)	£42.00	£45.00	OS	£3.00	7.1%	
Administration charge - Provision of refurbished replacement bins (set of 2)	n/a	£55.00	OS	NEW	NEW	New
Administration charge - Provision of refurbished replacement bin (single bin)	n/a	£35.00	OS	NEW	NEW	New
Bulky Items						
Collection of Bulky Items by Order:						
1 item	£23.00	£30.00	OS	£7.00	30.4%	*
2 items	£23.00	£35.00	OS	£12.00	52.2%	*
3 items	£23.00	£40.00	OS	£17.00	73.9%	*
4 items	£45.00	£45.00	OS	£0.00	0.0%	
5 items	£45.00	£50.00	OS	£5.00	11.1%	*
6 items	£45.00	£55.00	OS	£10.00	22.2%	*
* Increases set due to cost recovery						

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Licensing						
HACKNEY CARRIAGES						
First class hackney carriage	£252.00	£280.00	OS	£28.00	11.1%	*
Second class hackney carriage	£273.00	£300.00	OS	£27.00	9.9%	
Private hire operator (5 years) 1-10 Vehicles	£368.00	£390.00	OS	£22.00	6.0%	
Private hire operator (5 years) 11-20 Vehicles	£368.00	£490.00	OS	£122.00	33.2%	*
Private hire operator (5 years) - 20+ vehicles	£368.00	£710.00	OS	£342.00	92.9%	*
Private hire vehicle	£252.00	£280.00	OS	£28.00	11.1%	*
Drivers licence (3 years)	£174.00	£220.00	OS	£46.00	26.4%	*
Drivers Licence (1 year issue for exceptional circumstances)	£111.00	£160.00	OS	£49.00	44.1%	*
Transfer of vehicle Licence	£67.00	£75.00	OS	£8.00	11.9%	*
Knowledge test	£20.00	£25.00	OS	£5.00	25.0%	*
Replacement Badges/Crests	£10.00	£12.00	OS	£2.00	20.0%	*
Replacement Plate	£20.00	£23.00	OS	£3.00	15.0%	*
SEX ESTABLISHMENTS						
Grant of annual Licence	£2,205.00	£2,205.00	OS	£0.00	0.0%	
Renewal of annual Licence (unless objections received/referred to Committee)	£552.00	£552.00	OS	£0.00	0.0%	
Transfer of annual Licence	£882.00	£882.00	OS	£0.00	0.0%	
GAMBLING ACT 2005 LICENCES						
Large Casino	£10,000.00	£10,000.00	OS	£0.00	0.0%	
New Annual fee	£10,000.00	£10,000.00	OS	£0.00	0.0%	
Variation	£5,000.00	£5,000.00	OS	£0.00	0.0%	
Transfer	£2,150.00	£2,150.00	OS	£0.00	0.0%	
Reinstatement	£2,150.00	£2,150.00	OS	£0.00	0.0%	
Provisional Statement	£10,000.00	£10,000.00	OS	£0.00	0.0%	
Licence Application (Prov. Holders)	£5,000.00	£5,000.00	OS	£0.00	0.0%	
Existing Casinos						
New	n/a					
Annual fee	£1,820.00	£1,820.00	OS	£0.00	0.0%	
Variation	£1,700.00	£1,700.00	OS	£0.00	0.0%	
Transfer	£1,160.00	£1,160.00	OS	£0.00	0.0%	
Reinstatement	£1,160.00	£1,160.00	OS	£0.00	0.0%	
Provisional Statement	n/a	n/a				
Licence Application (Prov. Holders)	n/a	n/a				
Betting premises						
New	£2,340.00	£2,340.00	OS	£0.00	0.0%	
Annual fee	£525.00	£525.00	OS	£0.00	0.0%	
Variation	£1,170.00	£1,170.00	OS	£0.00	0.0%	
Transfer	£925.00	£925.00	OS	£0.00	0.0%	
Reinstatement	£925.00	£925.00	OS	£0.00	0.0%	
Provisional Statement	£2,340.00	£2,340.00	OS	£0.00	0.0%	
Licence Application (Prov. Holders)	£925.00	£925.00	OS	£0.00	0.0%	
Betting (Tracks)						
New	£2,040.00	£2,040.00	OS	£0.00	0.0%	
Annual fee	£625.00	£625.00	OS	£0.00	0.0%	
Variation	£990.00	£990.00	OS	£0.00	0.0%	
Transfer	£760.00	£760.00	OS	£0.00	0.0%	
Reinstatement	£760.00	£760.00	OS	£0.00	0.0%	
Provisional Statement	£2,040.00	£2,040.00	OS	£0.00	0.0%	
Licence Application (Prov. Holders)	£760.00	£760.00	OS	£0.00	0.0%	
Bingo premises						
New	£2,850.00	£2,850.00	OS	£0.00	0.0%	
Annual fee	£700.00	£700.00	OS	£0.00	0.0%	
Variation	£1,390.00	£1,390.00	OS	£0.00	0.0%	
Transfer	£925.00	£925.00	OS	£0.00	0.0%	
Reinstatement	£925.00	£925.00	OS	£0.00	0.0%	
Provisional Statement	£2,850.00	£2,850.00	OS	£0.00	0.0%	
Licence Application (Prov. Holders)	£925.00	£925.00	OS	£0.00	0.0%	
Adult Gaming Centre						
New	£1,625.00	£1,625.00	OS	£0.00	0.0%	
Annual fee	£715.00	£715.00	OS	£0.00	0.0%	
Variation	£815.00	£815.00	OS	£0.00	0.0%	
Transfer	£925.00	£925.00	OS	£0.00	0.0%	
Reinstatement	£925.00	£925.00	OS	£0.00	0.0%	
Provisional Statement	£1,625.00	£1,625.00	OS	£0.00	0.0%	
Licence Application (Prov. Holders)	£925.00	£925.00	OS	£0.00	0.0%	
Family Ent. Centres						
New	£1,625.00	£1,625.00	OS	£0.00	0.0%	
Annual fee	£580.00	£580.00	OS	£0.00	0.0%	
Variation	£815.00	£815.00	OS	£0.00	0.0%	
Transfer	£760.00	£760.00	OS	£0.00	0.0%	
Reinstatement	£760.00	£760.00	OS	£0.00	0.0%	
Provisional Statement	£1,625.00	£1,625.00	OS	£0.00	0.0%	
Licence Application (Prov. Holders)	£760.00	£760.00	OS	£0.00	0.0%	
Copy Licence	£25.00	£25.00	OS	£0.00	0.0%	
Notification of Change	£50.00	£50.00	OS	£0.00	0.0%	
Pavement Licence						
1 year pavement licence	£75.00	£100.00	OS	£25.00	33.3%	Set as maximum fee

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Sports and Leisure						
PITCH AND PUTT						
Bure Park (18 hole)						
Adult - per round	£8.60	£10.00	S	£1.40	16.3%	*
Concession - per round	£5.90	£7.00	S	£1.10	18.6%	*
Book of 10 Rounds						
Adults - per book	£62.00	£68.00	S	£6.00	9.7%	
Concessions - per book	£42.00	£46.00	S	£4.00	9.5%	
Lost ball charge	£2.20	£3.00	S	£0.80	36.4%	*
Deposit on Equipment (returnable)	£10.00	£10.00	OS	£0.00	0.0%	
ALL TENNIS COURTS						
Courts						
Per court per hour	£4.50	£6.00	S	£1.50	33.3%	*
PUTTING GREENS						
Gorleston Cliffs (9 hole)						
Adult - per round	£4.00	£4.50	S	£0.50	12.5%	*
Concession - per round	£2.80	£3.50	S	£0.70	25.0%	*
Equipment						
Deposit per putter	£10.00	£10.00	OS	£0.00	0.0%	
ALL BOWLING GREENS						
Green Fees						
Adult - per hour (incl woods)	£5.80	£6.50	S	£0.70	12.1%	*
Concession - per hour (incl woods)	£3.70	£4.20	S	£0.50	13.5%	*
Book of 10 x 1-hour tickets						
Adult	£42.00	£47.00	S	£5.00	11.9%	*
Concession	£27.00	£30.00	S	£3.00	11.1%	*
Book of 20 x 1-hour tickets						
Adult	£63.00	£70.00	S	£7.00	11.1%	*
Concession	£42.00	£47.00	S	£5.00	11.9%	*
Equipment						
Hire of woods per hour	No charge					
Deposit per set	£10.00	£10.00	OS	£0.00	0.0%	
Great Yarmouth Festival of Bowls Tournament						
Entrance fee per person per competition	£8.00	£7.00	S	£-1.00	-12.5%	Agreed with festival organisers to maintain numbers
FOOTBALL & RUGBY						
All teams based at Council pitches will have season tickets.						
Season Tickets (for a maximum of 14 home matches or 17 if paid through the relevant league)						
Adult	£615.00	£700.00	OS	£85.00	13.8%	*
18 years old and under	£325.00	£360.00	OS	£35.00	10.8%	
Casual Matches						
Adult	£78.00	£85.00	OS	£7.00	9.0%	
18 years old and under	£50.00	£54.50	OS	£4.50	9.0%	
Training						
Beaconsfield flood lit area per two-hour session	£41.00	£45.00	S	£4.00	9.8%	
Football at Wellesley Recreation Ground (grass pitch usage only)	£51.00	£60.00	OS	£9.00	17.6%	*
School team per match (grass pitch usage only)	£90.00	£45.00	OS	£-45.00	-50.0%	To encourage use
All use of floodlights in addition	£66.50	£70.00	OS	£3.50	5.3%	
Wellesley 3G pitch (3rd pitch) per hour	£35.00	£40.00	OS	£5.00	14.3%	*
Wellesley 3G pitch (full pitch) per hour	£85.00	£95.00	OS	£10.00	11.8%	*
Professional matches by negotiation						
Athletics at Wellesley Recreation Ground						
Great Yarmouth & District AC (incl floodlights)	£6,086.00	£6,750.00	OS	£664.00	10.9%	
ATHLETIC MEETINGS						
Other groups and clubs						
Half Day	£120.00	£150.00	S	£30.00	25.0%	*
Full Day	£240.00	£300.00	S	£60.00	25.0%	*
CRICKET						
Casual Matches						
Monday to Friday	£82.50	£90.00	S	£7.50	9.1%	
Saturday	£95.50	£106.00	S	£10.50	11.0%	*
Sunday	£109.00	£120.00	S	£11.00	10.1%	
Club League and Cup Fixtures						
Monday to Friday	£55.50	£62.00	OS	£6.50	11.7%	*
Saturday	£68.50	£76.00	OS	£7.50	10.9%	
Sunday	£79.00	£88.00	OS	£9.00	11.4%	*

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Land Searches						
Local Land Charge Fees						
Local Search (LLC1)	£15.00	£17.00	OS	£2.00	13.3%	*
Local Standard Enquiry (CON29)	£210.00	£233.00	S	£23.00	11.0%	*
Full Search (LLC1 and CON29)	£225.00	£250.00	S	£25.00	11.1%	*
Q2; Q22 and Rights of way	£21.00	£23.50	S	£2.50	11.9%	*
Local Search (LLC1) additional parcel of land	No Charge	No Charge				
Standard Enquiries (CON29) additional parcel of land (non-commercial)	£22.00	£24.50	S	£2.50	11.4%	*
Standard Enquiries (CON29) additional parcel of land (commercial)	£22.00	£24.40	S	£2.40	10.9%	
Additional Enquiries						
Optional enquiry (Part 2)	£15.00	£17.00	S	£2.00	13.3%	*
Optional enquiry (Part 3)	£15.00	£17.00	S	£2.00	13.3%	*
Personal Searches						
Statutory Personal Search Fee	No Charge	No Charge				
Additional parcel of land	No Charge	No Charge				
Fee for an assisted Personal Search	£58.00	£64.50	OS	£6.50	11.2%	*
Copy of Planning Permission Notice	£9.50	£11.00	S	£1.50	15.8%	*
Street Naming and Numbering						
Property Name change/Addition						
Dwelling (with existing SNN) - changing name and/or number	£59.00	£65.50	OS	£6.50	11.0%	*
Business or institutional unit (with existing SNN) - changing or adding name and/or number	£59.00	£65.50	OS	£6.50	11.0%	*
				£0.00		
				£0.00		
New Developments						
<i>Development not involving a new street name (per plot or the below charge for scale of development, if lower)</i>						
1-5 Plots (including new street name(s))	£63.00	£70.00	OS	£7.00	11.1%	*
6-10 Plots (including new street name(s))	£300.00	£333.00	OS	£33.00	11.0%	*
11-20 Plots (including new street name(s))	£390.00	£433.00	OS	£43.00	11.0%	*
21-50 Plots (including new street name(s))	£520.00	£577.00	OS	£57.00	11.0%	*
51-100 Plots (including new street name(s))	£1,040.00	£1,153.50	OS	£113.50	10.9%	
101+ plots (including new street name(s))	£1,430.00	£1,586.00	OS	£156.00	10.9%	
	£1,820.00	£2,018.50	OS	£198.50	10.9%	
Miscellaneous street naming/numbering						
Renaming street	£130.00	£144.50	OS	£14.50	11.2%	*
Street Nameplates (new, replacement or relocation - per plate)	£230.00	£255.50	OS	£25.50	11.1%	*
Formal confirmation of address to solicitors / conveyancers / owner or occupiers / etc.	£27.00	£30.00	OS	£3.00	11.1%	*
High Hedges						
Pre-submission Advice - Site visit to confirm whether meets definition of a high hedge (charge per hour or part thereof)	n/a	£25 Admin fee + Hourly rate(s)*		NEW	NEW	New
High Hedge Complaint	£385.00	£500.00	OS	£115.00	29.9%	*
Mapping Services						
OS Mastermap A4 (6 copies) 32 x 32m @ 1:200	£19.00	£21.50	ZE	£2.50	13.2%	*
OS Mastermap A4 (6 copies) 80 x 80m @ 1:500	£19.00	£21.50	ZE	£2.50	13.2%	*
OS Mastermap A4 (6 copies) 200 x 200m @ 1:1250	£32.00	£35.50	ZE	£3.50	10.9%	
OS Mastermap A4 (6 copies) 400 x 400m rural @ 1:2500	£32.00	£35.50	ZE	£3.50	10.9%	
OS Mastermap A4 (6 copies) 400 x 400m urban @ 1:2500	£64.00	£71.00	ZE	£7.00	10.9%	
OS VectorMap Local A4 (6 copies) 1600 x 1600m @ 1:10000	£32.00	£35.50	ZE	£3.50	10.9%	
Pre-Application Fees						
All other planning advice (falling outside the other categories identified in this schedule)	n/a	Hourly rate(s)*		NEW	NEW	New
Householder and small scale development						
Pre-application: Written only advice (Desktop Assessment)	£55.00	£150.00	S	£15.00	11.1%	*

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Land Searches						
Site visit (Set charge for 1 officer for 2 hours inc travel)	n/a	£125.00		NEW	NEW	New
Pre-Submission Validation check	n/a	£40.00		NEW	NEW	New
Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*		NEW	NEW	New
Minor Residential Development						
Residential development of between 1 & 9 dwellings						
Written Advice (inclusive of site visit) - 1 dwelling	n/a	£380.00		NEW	NEW	New
Written Advice - Each additional dwelling (max 9)	n/a	£75.00		NEW	NEW	New
Site Meeting (Administration fee and travel) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*		NEW	NEW	New
Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*		NEW	NEW	New
Pre-Submission Validation check	n/a	£80.00		NEW	NEW	New
Medium Residential Development						
Residential development of between 10 & 49 dwellings						
Written Advice (inclusive of site visit) - 10 dwellings	n/a	£1,500.00	S	NEW	NEW	New
Written Advice - Each additional dwelling (max 49)	n/a	£75.00	S	NEW	NEW	New
Site Meeting (Administration fee and travel) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	S	NEW	NEW	New
Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	S	NEW	NEW	New
Pre-Submission Validation check	n/a	£160.00	S	NEW	NEW	New
Major Residential Development						
Written Advice (inclusive of site visit) - 50 dwellings or more	n/a	£5,000.00	S	NEW	NEW	New
Written Advice - Each additional dwelling	n/a	£25.00	S	NEW	NEW	New
Site Meeting (Administration fee and travel) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	S	NEW	NEW	New
Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	S	NEW	NEW	New
Pre-Submission Validation check	n/a	£360.00	S	NEW	NEW	New
Non-Residential Development						
Written Advice - Non-residential development less than 100sqm net internal floorspace	£625.00	£693.50	S	£68.50	11.0%	*
Written Advice - Non-residential development less than 999sqm net internal floorspace	£1,705.00	£1,891.50	S	£186.50	10.9%	
Written Advice - Non-residential development more than 10,000sqm net internal floorspace	£3,510.00	£3,893.00	S	£383.00	10.9%	
Site Meeting (Administration fee and travel) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)	S	NEW	NEW	New
Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	S	NEW	NEW	New
Pre-Submission Validation check - Non-residential development less than 100sqm net internal floorspace	n/a	£80.00	S	NEW	NEW	New
Pre-Submission Validation check - Non-residential development less than 999sqm net internal floorspace	n/a	£160.00	S	NEW	NEW	New
Pre-Submission Validation check - Non-residential development more than 10,000sqm net internal floorspace	n/a	£360.00	S	NEW	NEW	New
Hourly Rates*						
Planning Technician	n/a	£40.00	S	NEW	NEW	New
Planning Officer	n/a	£60.00	S	NEW	NEW	New
Senior Planning Officer	n/a	£80.00	S	NEW	NEW	New
Principal Planning Officer	n/a	£100.00	S	NEW	NEW	New
Development Manager / Strategic Planning Manager	n/a	£120.00	S	NEW	NEW	New
Head of Planning	n/a	£150.00	S	NEW	NEW	New
Confirming Compliance with S106 and Conditions						
Confirming compliance with an imposed planning condition	£100.00	£115.00	S	£15.00	15.0%	*
Confirming compliance with a section 106 agreement (additional fee for legal advice if required).	£150.00	£175.00	S	£25.00	16.7%	*
Planning Performance Agreements						
Contact Great Yarmouth Borough Council to discuss (bespoke)						
Hourly rates for anticipated officer input	n/a	Hourly rate(s)*	S	NEW	NEW	New
Set-up fee	n/a	£500.00	S	NEW	NEW	New
Planning enforcement						
Written confirmation of closure of enforcement case where it was found not expedient to take action (available for a 12-month period following closure of the case)	n/a	£80.00	S	NEW	NEW	New

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Land Searches						
Written confirmation that an Enforcement Notice has been complied with	n/a	£200.00	S	NEW	NEW	New
Request to withdraw enforcement notice	n/a	£200.00	S	NEW	NEW	New
S106 Monitoring Fees						
Negotiated fee based on - £500 per obligation/clause that requires the Council to either: receive a financial contribution, assess and/or agree a submission or any other activity requiring the input of Council officers.	n/a	Price on application	S	NEW	NEW	New
Administration fees						
Administration charges for invalid applications not made valid	n/a	£50.00	S	NEW	NEW	New
All non-major applications with no planning officer input	n/a	£100.00	S	NEW	NEW	New
Major applications and/or applications where officer input had been	n/a	£100.00	S	NEW	NEW	New

Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
Community Alarm Service						
Private users						
Alarm monitoring service - per week	£1.86	£1.86	S	£0.00	0.0%	Frozen
Alarm monitoring service - per month	£8.05	£8.05	S	£0.00	0.0%	Frozen
Alarm monitoring service - per annum	£96.55	£96.55	S	£0.00	0.0%	Frozen
Alarm unit rental - per week (inc. monitoring)	£4.06	£4.06	S	£0.00	0.0%	Frozen
Alarm unit rental - per month (inc. monitoring)	£17.58	£17.58	S	£0.00	0.0%	Frozen
Alarm unit rental - per quarter (inc. monitoring)	£52.75	£52.75	S	£0.00	0.0%	Frozen
Alarm unit rental - per annum (inc. monitoring)	£210.98	£210.98	S	£0.00	0.0%	Frozen
Community Alarm Set-up & Installation Fee - within Borough	£57.56	£57.56	S	£0.00	0.0%	Frozen
Community Alarm Set-up & Installation Fee - Outside Borough	£65.47	£65.47	S	£0.00	0.0%	Frozen
Community Alarm Set-up & Postage Fee	£54.00	£54.00	S	£0.00	0.0%	Frozen
Community alarm - digital alarm with falls detector (inc monitoring)	£239.99	£239.99	S	£0.00	0.0%	Frozen
Council Tenants						
Alarm monitoring service - per week	£1.93	£1.93	OS/S	£0.00	0.0%	Frozen
Alarm unit rental - per week (inc. monitoring)	£4.22	£4.22	OS/S	£0.00	0.0%	Frozen
Allocation service						
Charge per let under allocation partnership	£100.00	£100.00	OS	£0.00	0.0%	Frozen

Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges	2023/24 Charge		2024/25 Charge		VAT Status	Change In year		% Change		Notes
	Per Metre	Per Foot	Per Metre	Per Foot		Per Metre	Per Foot	Per Metre	Per Foot	
Market Place										
Two-day market - charges (Wednesday, Friday and Saturday)	£2.00	£0.61	£2.22	£0.68	EX	£0.22	£0.07	11.0%	11.0%	Above policy from roundings
Casual two-day market - charges (Wednesday, Friday and Saturday)	£3.00	£0.91	£3.33	£1.01	EX	£0.33	£0.10	11.0%	11.0%	Above policy from roundings
Specialist Event Market charges										
Up to 10 foot/3 Metres	Price on application	Price on application	Price on application	Price on application	EX	n/a	n/a	n/a	n/a	
Up to 20 foot/6 Metres	Price on application	Price on application	Price on application	Price on application	EX	n/a	n/a	n/a	n/a	
Up to 30 foot/9 Metres	Price on application	Price on application	Price on application	Price on application	EX	n/a	n/a	n/a	n/a	
Chalet – 3 Metres	Price on application	Price on application	Price on application	Price on application	EX	n/a	n/a	n/a	n/a	
Charity Barrow Fee	Free	Free	Free	Free						
Craft Barrow Fee	£12.00	n/a	£13.31	n/a	EX	£1.31	n/a	10.9%	n/a	
Daily Electricity Charge per day	£0.06	n/a	£0.07	n/a		£0.01	n/a	16.7%	n/a	Above policy from roundings

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
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Charges for Beach Huts

Gorleston Beach Huts

Beach Hut Purchase rates

Beach Hut Purchase with 25-year ground lease	Price on application	Price on application	S			
Beach Hut Purchase with 25-year ground lease	Price on application	Price on application	S			

Ground Rent Fee Gorleston (per year)	Price on application	Price on application	S	n/a	n/a	
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Ground Rent Fee Great Yarmouth (per year)	Price on application	Price on application	S	New	New	
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Hire Charge Annual rental - Gorleston	£2,340.00	£2,690.00	S	£350.00	15.0%	*
Hire Charge Annual rental - Great Yarmouth	£2,040.00	£2,260.00	S	£220.00	10.8%	

Weekly rental (subject to availability)

Low season – April/November/January/February/ March	£60.00	£70.00	S	£10.00	16.7%	*
Mid Season – May/June/September/October	£145.00	£160.00	S	£15.00	10.3%	
High Season – July & August	£215.00	£240.00	S	£25.00	11.6%	*

Monthly rental (subject to availability)

Low season – April/November/January/February/ March	£175.00	£195.00	S	£20.00	11.4%	*
Mid Season – May/June/September/October	£430.00	£480.00	S	£50.00	11.6%	*
High Season – July & August	£640.00	£710.00	S	£70.00	10.9%	

Charges for Market Fairs

Category/Attraction Description

A – Roundabouts over 25ft (7.62m) in diameter or any other machinery or apparatus, whether operated by electricity, steam, hand or other means	£4.00	£4.50 OS		£0.50	12.5%	*
B - Roundabouts less than 25ft (7.62m) in diameter, power operated Hoopla's, Spinners and games of similar nature	£6.90	£7.70 OS		£0.80	11.6%	*
C - Non-mechanical operated Hoopla's, swinging boats, Booths, Shows and Exhibitions and Refreshments kiosks	£4.60	£5.20 OS		£0.60	13.0%	*
D - Dart stalls, Coconut-shy, Shooting Galleries and other Shooting Games	£2.40	£2.70 OS		£0.30	12.5%	*
<i>All costs based on square metres.</i>						*
<i>Minimum Charge</i>	£44.00	£50.00 OS		£6.00	13.6%	*

Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges	2024/25	2024/25	2024/25	2024/25	New
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Events Fees & Event Car Parking Fees

Application Fees

Application fees are in addition to the site fee and are non-refundable payable on submitting event notification on Council land

	Small Events (up to 500)	Medium Events (501-2999)	Major Events (3000+)	Promotional Stands	
Commercial (Organiser charging entry fee)	£60.00	£75.00	£115.00	£60.00	NEW
Commercial (Event is free entry)	£60.00	£75.00	£115.00	£60.00	NEW
Charity (National)	£60.00	£75.00	£115.00	£60.00	NEW
Charity (Local)	£30.00	£40.00	£60.00	£30.00	NEW

CATEGORY A SITE FEE

Great Yarmouth Seafront, Town Centre & St Georges Park (Hire Charge per Day)

Event Organiser Category	Small Events (up to 500)	Medium Events (501-2999)	Major Events (3000+)	Promotional Stands	
Commercial (Organiser charging entry fee)	£350.00	£700.00	On Application	n/a	NEW
Commercial (Event is free)	£300.00	£600.00	On Application	£40 per sq m	NEW
Charity (National)	£175.00	£350.00	£700.00	£25 per sq m	NEW
Charity (local)	No Charge	No Charge	No Charge	No Charge	NEW

Note build & break down days 50% of the above

CATEGORY B SITE FEE

Gorleston Seafront area, all other parks & council open space within the borough (Hire Charge per day)

Event Organiser Category	Small Events (up to 500)	Medium Events (501-2999)	Major Events (3000+)	Promotional Stands	
Commercial (Organiser charging entry fee)	£300.00	£650.00	On Application	n/a	NEW
Commercial (Event is free)	£250.00	£550.00	On Application	£35 per sq m	NEW
Charity (National)	£150.00	£300.00	£650.00	dec	NEW
Charity (local)	No Charge	No Charge	No Charge	No Charge	NEW

Note build & break down days 50% of the above

A local charity is described as a charity that is registered and /or operates within Great Yarmouth Borough providing a variety of goods, products or services that are needed to the local population

OTHER COSTS

Please note that there may be additional costs incurred for particular events, which will be calculated on a case by case basis. These can include (but are not constrained to):

Damage deposit - (refundable if no damage)
 Parking - loss of income and parking bay
 Waste management - for example waste bins
 Event monitoring - in compliance with policy
 Highways - Road Closures and signage costs
 Licensing fees - alcohol etc.
 Electricity supply- if electrical supplies are

Car Park Event Fees

Min charge applies of £100 for full day

Town Centre Car Parks	April to October	November to March	
	Full Day	Full Day	
King Street & Market Place	£ 480.00	£ 370.00	NEW
Brewery Plain, George Street & Stonecutters Way	£ 100.00	£ 100.00	NEW
Fuller Hill	£ 200.00	£ 100.00	NEW

Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges	2024/25	2024/25	2024/25	2024/25	New
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Events Fees & Event Car Parking Fees					
Other Car Parks	April to October		November to March		
	Full Day		Full Day		NEW
Beach Road Caister	£	140.00	Licence fee		NEW
Gorleston High Street, Blackfriars rd, Middlegate	£	100.00	£	100.00	NEW

Seafront Short Stay	April, May, June		July, August		September, October	November to March*		
Car parks	Full day		Full day		Full day	Full day		NEW
Anchor Gardens	£	300.00	£	500.00	£	250.00	£	100.00
Euston Road	£	900.00	£	1,600.00	£	750.00	£	100.00
Jetty North	£	540.00	£	910.00	£	280.00	£	114.00
Jetty South	£	300.00	£	560.00	£	230.00	£	100.00

* Where Easter falls in March the rates April to June will be applied

Seafront Long Stay	April, May, June		July, August		September, October	November to March*		
Car Parks	Full day		Full day		Full day	Full day		NEW
North Drive	£	850.00	£	1,900.00	£	580.00	£	110.00
St Nicholas	£	1,300.00	£	3,000.00	£	850.00	£	110.00
Sandown Road (Lorry)	£	100.00	£	130.00	£	100.00	£	100.00
Sandown Road (Car)	£	180.00	£	580.00	£	150.00	£	100.00
Marina Centre	£	750.00	£	1,200.00	£	750.00	£	160.00

* Where Easter falls in March the rates April to June will be applied

Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges	2023/24	2024/25	VAT Status	Change in year	% Change	Notes
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Charges for Filming and Photography

Notice of no objection for Commercial photography	£40.50	£44.50	S	£4.00	9.9%	
Consent Certificate for Commercial Photography	£40.50	£44.50	S	£4.00	9.9%	
Standard filming fee per each consent or notice of no objection required	£80.00	£87.50	S	£7.50	9.4%	
Small feature film fee per each consent certificate or notice of no objection required	Price on application	Price on application	S			
Large feature film fee (charges from)	Price on application	Price on application	S			

Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges				Monday-Friday			Weekends & bank holidays			Notes
Charges for Town Hall 2024/25				Per Hour	Per Half day	Per Day	Per Hour	Per Half day	Per Day	
Civil Ceremonies/Wedding Ceremonies Room Hire.										
Old Magistrates Court room hire per day (Maximum 2 hours)				£0	£0	£405	£0	£0	£675	Fees Frozen
Supper Room/ Rambouillet/Old Magistrates Court										
Renewal of Vows or Ceremonies where a private celebrant is used in any of the above rooms (maximum two hours room hire)				£0	£0	£340	£0	£0	£675	Fees Frozen
Wedding/ Party celebration up to midnight (minimum three hours).				£85	£0	£0	£135	£0	£0	Fees Frozen
Assembly Room										
Monday - Thursday				£0	£0	£1,050	£0	£0	£0	Fees Frozen
Friday & Saturday				£0	£0	£0	£0	£0	£1,350	Fees Frozen
Sundays & Bank Holidays				£0	£0	£0	£0	£0	£2,700	Fees Frozen
Hire of Kitchen & Equipment (From £1 per person)				Price on application			Price on application			
A 20% Non-returnable deposit is required for above bookings										
Council Chamber										
Private, Public and Commercial (Weekdays 08:00- 18:00)				£0	£205	£410	£0	£0	£0	Fees Frozen
Private, Public and Commercial (Weekday & Evenings 18:00-00.00)				£85	£0	£0	£0	£0	£0	Fees Frozen
Private, Public and Commercial (Weekends and Bank Holidays) (£85 per hour after 8 hours) Please note half day is 4 hrs and full day is 8 hrs.				£0	£0	£0	£85	£270	£540	Fees Frozen
Rambouillett Room & Supper Room										
Private, Public and Commercial (Weekdays 08:00- 18:00)				£0	£135	£270	£0	£0	£0	Fees Frozen
Private, Public and Commercial (Evenings 18:00- 00.00)				£70	£0	£0	£0	£0	£0	Fees Frozen
Private, Public and Commercial (Weekends and Bank Holidays) (£60 per hour after 8 hours) Please note half day is 4 hrs and full day is 8 hrs.				£0	£0	£0	£85	£270	£540	Fees Frozen
Bespoke Room Hire & Wedding Packages				Price on application			Price on application			
Other Charges										
Atrium Drinks Reception/additional space with any room				£0	£0	£135	£0	£0	£135	Fees Frozen
Set Up Room Hire				£0	£0	£135	£0	£0	£135	Fees Frozen
Additional event staff (18:00-00:00 events over 100 people)				£0	£0	£150	£0	£0	£150	Fees Frozen
Extra Hire charge PA Equipment				£0	£0	£135	£0	£0	£135	Fees Frozen
Red Carpet				£0	£0	£15	£0	£0	£115	Fees Frozen

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Fees and Charges
2024/25
Great Yarmouth Borough Council

Fees & Charges				Monday-Friday		Weekends & bank holidays		Notes		
Charges for Town Hall 2024/25				Per Hour	Per Half day	Per Day	Per Hour	Per Half day	Per Day	
Linen				£0	£0	Price on request	£0	£0	Price on request	Fees Frozen
Extended opening/Late Licence				£0	£0	£135	£0	£0	£135	Fees Frozen
Presentation TV Screen				£0	£0	£60	£0	£0	£60	Fees Frozen
Per person				Per person						
Teas, coffee and Biscuits charges				£3.60	n/a	n/a	£3.60	n/a	n/a	Fees Frozen

NOTE:

Subsidised and Charities Rate 25% discount on all above: Rooms will only be available Mon-Thu at these rates.

A 20% deposit will be required at the time of booking.

All outstanding balances to be paid within 14 days after the event

Area		Heading 1	Heading 2	2023/24	2024/25	% increase	Reason
Car Parking	Customer Services	Middlegate Car Park	Monday to Sunday (8am to 9pm)	£1.20	£1.50	25.0%	Increase to bring in line with other car parks
	Customer Services	Gorleston High Street	90 minutes (8am - 4pm)	n/a	£1.60	NEW	Offer a 90 min rate for £1.50 instead of hourly rate (align to Town Centre Car Parks but with no 30 min rate)
Car Parking	Customer Services	Gorleston High Street	2 hrs	n/a	£2.20	NEW	Offer a 90 min rate for £1.50 instead of hourly rate (align to Town Centre Car Parks but with no 30 min rate)
	Customer Services	Visual tributes	Visual Tribute Family Video File as part of slide show	£0.00	£20.00	NEW	New Fee
Crematorium and Memorial	Customer Services	Visual tributes	Visual Tribute Family Video File as part of slide show	£0.00	£20.00	NEW	New Fee
Env Serv	Food Hygiene Inspections	Food mentoring visit	Maximum 2 hours	n/a	£150.00	NEW	New Fee, saving approved
Planning - Review of the fees charges being charged to reflect the provision of the service							
	Planning	High Hedges	Pre-submission Advice - Site visit to confirm whether meets definition of a high hedge (charge per hour or part thereof)	n/a	£25 Admin fee + Hourly rate(s)*	NEW	Used to be site visit at £60.
	Planning	Pre-Application Fees	All other planning advice (falling outside the other categories identified in this schedule)	n/a	Hourly rate(s)*	NEW	New provision to allow for cost recovery on work required for proposals falling outside the other categories identified
	Planning	Pre-Application Fees	Site visit (Set charge for 1 officer for 2 hours inc travel)	n/a	£125.00	NEW	New fee. Fixed at a level to cover assumed cost of 1 officer for 2 hour visit inclusive of travel and associated expenses.
	Planning	Pre-Application Fees	Pre-Submission Validation check	n/a	£40.00	NEW	New fee for new enhanced service offer. Provision to allow applicant to have application pack checked prior to submission. Assumes 1 hour of input.
	Planning	Pre-Application Fees	Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	NEW	New fee. Administration charge to cover meeting setup and then cost recovery for attendees.
	Planning	Minor Residential Development	Written Advice (inclusive of site visit) - 1 dwelling	n/a	£380.00	NEW	Amendment to fee approach to be variable to increase proportionately to the scale of development.
	Planning	Minor Residential Development	Written Advice - Each additional dwelling (max 9)	n/a	£75.00	NEW	Price per additional unit to reflect in increase in work required as schemes increase in scale.
	Planning	Minor Residential Development	Site Meeting (Administration fee and travel) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	NEW	New fee. Administration charge to cover travel planning and normal expenses, and then cost recovery for attendees.
	Planning	Minor Residential Development	Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	NEW	New fee. Administration charge to cover meeting setup and then cost recovery for attendees.
	Planning	Minor Residential Development	Pre-Submission Validation check	n/a	£80.00	NEW	New fee for new enhanced service offer. Provision to allow applicant to have application pack checked prior to submission. Assumes 2 hours of input.
	Planning	Medium Residential Development	Written Advice (inclusive of site visit) - 10 dwellings	n/a	£1,500.00	NEW	Amendment to fee approach to be variable to increase proportionately to the scale of development.
	Planning	Medium Residential Development	Written Advice - Each additional dwelling (max 49)	n/a	£75.00	NEW	Price per additional unit to reflect in increase in work required as schemes increase in scale.
	Planning	Medium Residential Development	Site Meeting (Administration fee and travel) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	NEW	New fee. Administration charge to cover travel planning and normal expenses, and then cost recovery for attendees.
	Planning	Medium Residential Development	Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	NEW	New fee. Administration charge to cover meeting setup and then cost recovery for attendees.
	Planning	Medium Residential Development	Pre-Submission Validation check	n/a	£160.00	NEW	New fee for new enhanced service offer. Provision to allow applicant to have application pack checked prior to submission. Assumes multiple officers or senior officer input.
	Planning	Major Residential Development	Written Advice (inclusive of site visit) - 50 dwellings or more	n/a	£5,000.00	NEW	Amendment to fee approach to be variable to increase proportionately to the scale of development.
	Planning	Major Residential Development	Written Advice - Each additional dwelling	n/a	£25.00	NEW	Price per additional unit to reflect in increase in work required as schemes increase in scale.
	Planning	Major Residential Development	Site Meeting (Administration fee and travel) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	NEW	New fee. Administration charge to cover travel planning and normal expenses, and then cost recovery for attendees.

Area	Heading 1	Heading 2	2023/24	2024/25	% increase	Reason
Planning	Planning	Major Residential Development	Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	NEW New fee. Administration charge to cover meeting setup and then cost recovery for attendees.
	Planning	Major Residential Development	Pre-Submission Validation check	n/a	£360.00	NEW New fee for new enhanced service offer. Provision to allow applicant to have application pack checked prior to submission. Assumes multiple officers or senior officer input.
	Planning	Non-Residential Development	Site Meeting (Administration fee and travel) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)	NEW New fee. Administration charge to cover travel planning and normal expenses, and then cost recovery for attendees.
	Planning	Non-Residential Development	Meeting (Administration fee) plus Hourly rate(s)	n/a	£25 + Hourly rate(s)*	NEW New fee. Administration charge to cover meeting setup and then cost recovery for attendees.
	Planning	Non-Residential Development	Pre-Submission Validation check - Non-residential development less than 100sqm net internal floorspace	n/a	£80.00	NEW New fee for new enhanced service offer. Provision to allow applicant to have application pack checked prior to submission. Assumes 2 hours of input.
	Planning	Non-Residential Development	Pre-Submission Validation check - Non-residential development less than 999sqm net internal floorspace	n/a	£160.00	NEW New fee for new enhanced service offer. Provision to allow applicant to have application pack checked prior to submission. Assumes multiple officers or senior officer input.
	Planning	Non-Residential Development	Pre-Submission Validation check - Non-residential development more than 10,000sqm net internal floorspace	n/a	£360.00	NEW New fee for new enhanced service offer. Provision to allow applicant to have application pack checked prior to submission. Assumes multiple officers or senior officer input.
	Planning	Hourly Rates*	Planning Technician	n/a	£40.00	NEW Cost to recruit Agency support to provide service
	Planning	Hourly Rates*	Planning Officer	n/a	£60.00	NEW Cost to recruit Agency support to provide service
	Planning	Hourly Rates*	Senior Planning Officer	n/a	£80.00	NEW Cost to recruit Agency support to provide service
	Planning	Hourly Rates*	Principal Planning Officer	n/a	£100.00	NEW Cost to recruit Agency support to provide service
	Planning	Hourly Rates*	Development Manager / Strategic Planning Manager	n/a	£120.00	NEW Cost to recruit Agency support to provide service
	Planning	Hourly Rates*	Head of Planning	n/a	£150.00	NEW Cost to recruit Agency support to provide service
	Planning	Planning Performance Agreements	Hourly rates for anticipated officer input	n/a	Hourly rate(s)*	NEW Cost recovery
	Planning	Planning Performance Agreements	Set-up fee	n/a	£500.00	NEW Cover administration costs of negotiating/setting up new PPA.
	Planning	Planning enforcement	Written confirmation of closure of enforcement case where it was found not expedient to take action (available for a 12-month period following closure of the case)	n/a	£80.00	NEW Cover officer cost to research and provide written response.
	Planning	Planning enforcement	Written confirmation that an Enforcement Notice has been complied with	n/a	£200.00	NEW Cover officer cost in re-assessing the need for the enforcement notice to remain.
	Planning	Planning enforcement	Request to withdraw enforcement notice	n/a	£200.00	NEW Cover officer cost to research and provide written response.
	Planning	S106 Monitoring Fees	Negotiated fee based on - £500 per obligation/clause that requires the Council to either: receive a financial contribution, assess and/or agree a submission or any other activity requiring the input of Council officers.	n/a	Price on application	NEW To cover the administration costs involved in the monitoring of S106 legal agreements. Bespoke charge to reflect the individual nature of agreements and the monitoring burden they will represent to the Council.
	Planning	Administration fees	All non-major applications with no planning officer input	n/a	£50.00	NEW Retain proportion of refunded fees to cover administration time incurred in assessing and returning submission.
	Planning	Administration fees	Major applications and/or applications where officer input had been required	n/a	£100.00	NEW Retain proportion of refunded fees to cover administration time incurred in assessing and returning submission.

Town Centre Car Parks	April to October Full Day	November to March Full Day
King Street & Market Place	£480.00	£370.00
Brewery Plain, George Street & Stonecutters Way	£100.00	£100.00
Fuller Hill	£200.00	£100.00

Min charge applies of £100 for full day
Min charge applies

Other Car Parks	April to October Full Day	November to March Full Day
Beach Road Caister	£ 140.00	Licence fee
Gorleston High Street, Blackfriars rd, Middlegate	£ 100.00	£ 100.00

Min fee applies (permission from preservation trust where required)

Seafront Short Stay Car parks	April, May, June Full day	July, August Full day	September, October Full day	November to March* Full day
Anchor Gardens	£300.00	£500.00	£250.00	£100.00
Euston Road	£900.00	£1,600.00	£750.00	£100.00
Jetty North	£540.00	£910.00	£280.00	£114.00
Jetty South	£300.00	£560.00	£230.00	£100.00

Min charge applies

Min charge applies

Min charge applies

* Where Easter falls in March the rates April to June will be applied

Seafront Long Stay Car Parks	April, May, June Full day	July, August Full day	September, October Full day	November to March* Full day
North Drive	£850.00	£1,900.00	£580.00	£110.00
St Nicholas	£1,300.00	£3,000.00	£850.00	£110.00
Sandown Road (Lorry)	£100.00	£130.00	£100.00	£100.00
Sandown Road (Car)	£180.00	£580.00	£150.00	£100.00
Marina Centre	£750.00	£1,200.00	£750.00	£160.00

* Where Easter falls in March the rates April to June will be applied

EVENTS ON COUNCIL LAND

Application Fees				
<i>Application fees are in addition to the site fee and are non-refundable payable on submitting event notification on Council land</i>				
	Small Events (up to 500)	Medium Events (501-2999)	Major Events (3000+)	Promotional Stands
Commercial (Organiser charging entry fee)	£60.00	£75.00	£115.00	£60.00
Commercial (Event is free entry)	£60.00	£75.00	£115.00	£60.00
Charity (National)	£60.00	£75.00	£115.00	£60.00
Charity (Local)	£30.00	£40.00	£60.00	£30.00

CATEGORY A SITE FEE	Great Yarmouth Seafront, Town Centre & St Georges Park (Hire Charge per Day)			
Event Organiser Category	Small Events (up to 500)	Medium Events (501-2999)	Major Events (3000+)	Promotional Stands
Commercial (Organiser charging entry fee)	£350.00	£700.00	On Application	n/a
Commercial (Event is free)	£300.00	£600.00	On Application	£40 per sq m
Charity (National)	£175.00	£350.00	£700.00	£25 per sq m
Charity (local)	No Charge	No Charge	No Charge	No Charge
Note build & break down days 50% of the above				

CATEGORY B SITE FEE	Gorleston Seafront area, all other parks & council open space within the borough (Hire Charge per day)			
Event Organiser Category	Small Events (up to 500)	Medium Events (501-2999)	Major Events (3000+)	Promotional Stands
Commercial (Organiser charging entry fee)	£300.00	£650.00	On Application	n/a
Commercial (Event is free)	£250.00	£550.00	On Application	£35 per sq m
Charity (National)	£150.00	£300.00	£650.00	dec
Charity (local)	No Charge	No Charge	No Charge	No Charge
Note build & break down days 50% of the above				

A local charity is described as a charity that is registered and /or operates within Great Yarmouth Borough providing a variety of goods, products or services that are needed to the local population

OTHER COSTS

Please note that there may be additional costs incurred for particular events, which will be calculated on a case by case basis. These can include (but are not constrained to)

Damage deposit - (refundable if no damage occurs)

Parking - loss of income and parking bay suspensions

Waste management - for example waste bins and refuse collections for the event

Event monitoring - in compliance with policy and location of hire agreement

Highways - Road Closures and signage costs

Licensing fees - alcohol etc.

Electricity supply- if electrical supplies are available these will be charged per day per charging point on application