

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
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_

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/>



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.

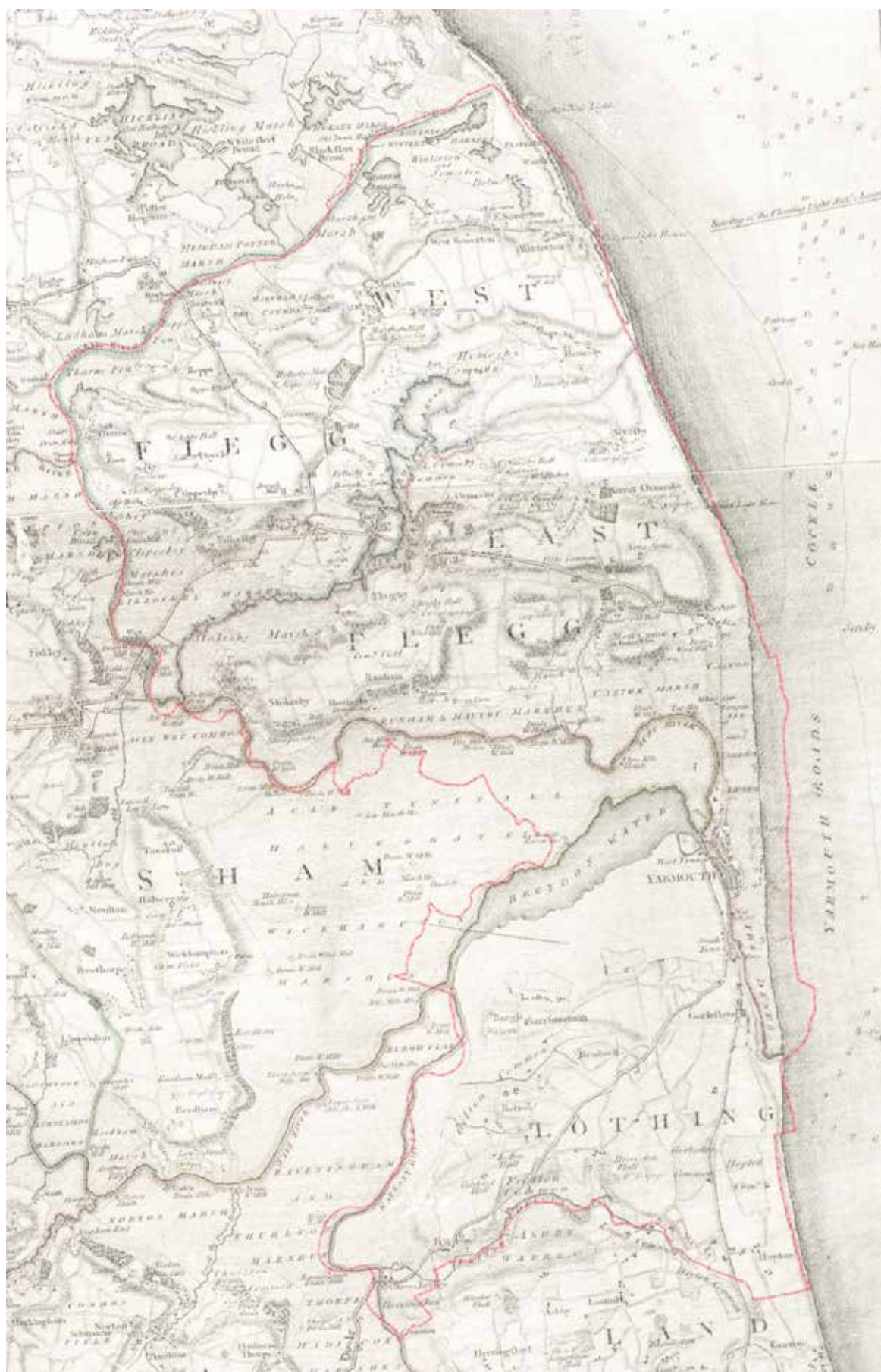


Fig. 4. 1797 Faden map, current boundary of Great Yarmouth borough indicated in red. The map can be further explored at <http://www.fadensmapofnorfolk.co.uk/>

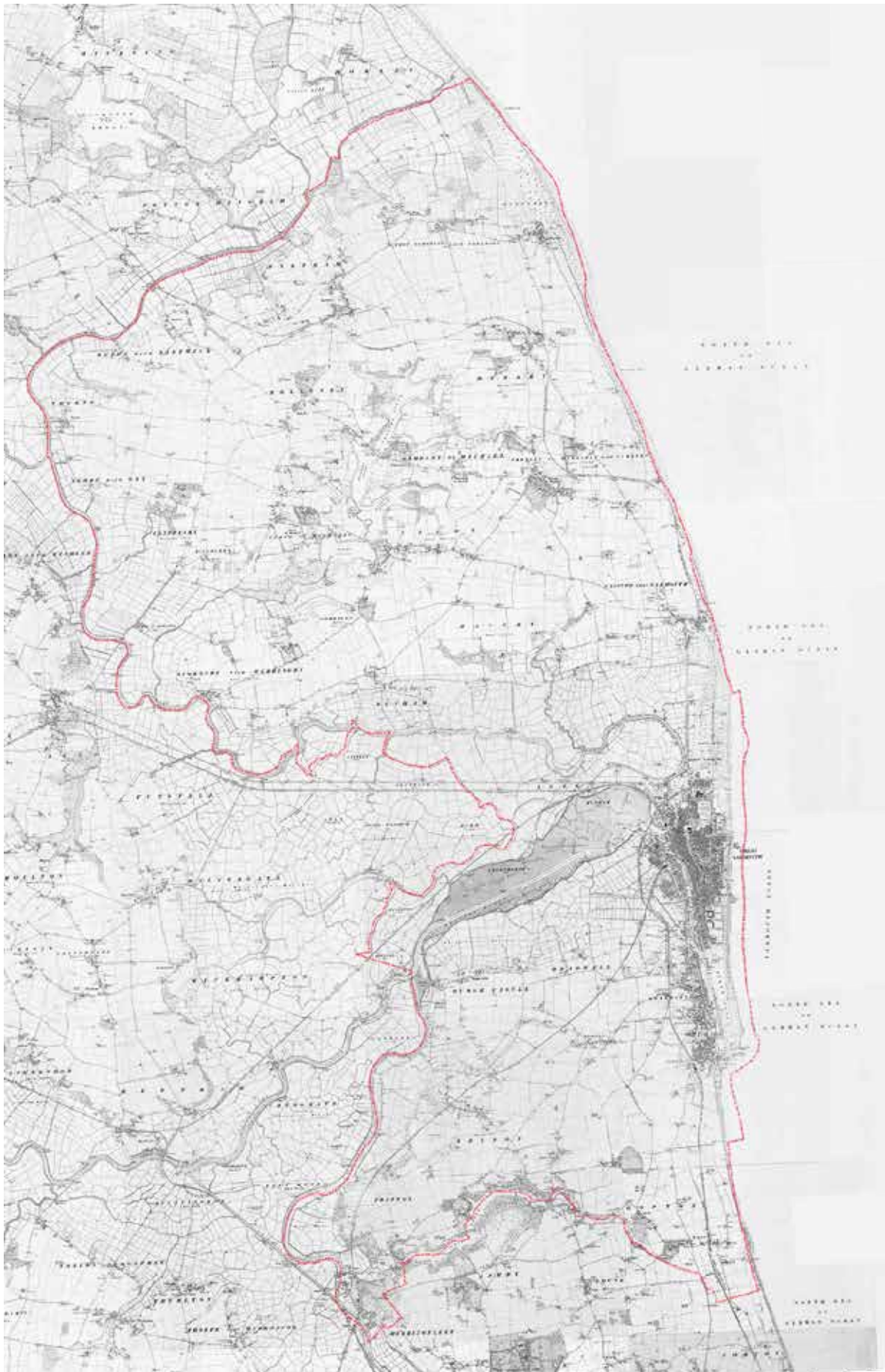


Fig. 5. Ordnance Survey map from 1888. This map can be further explored via the National Library of Scotland website, <https://maps.nls.uk/>

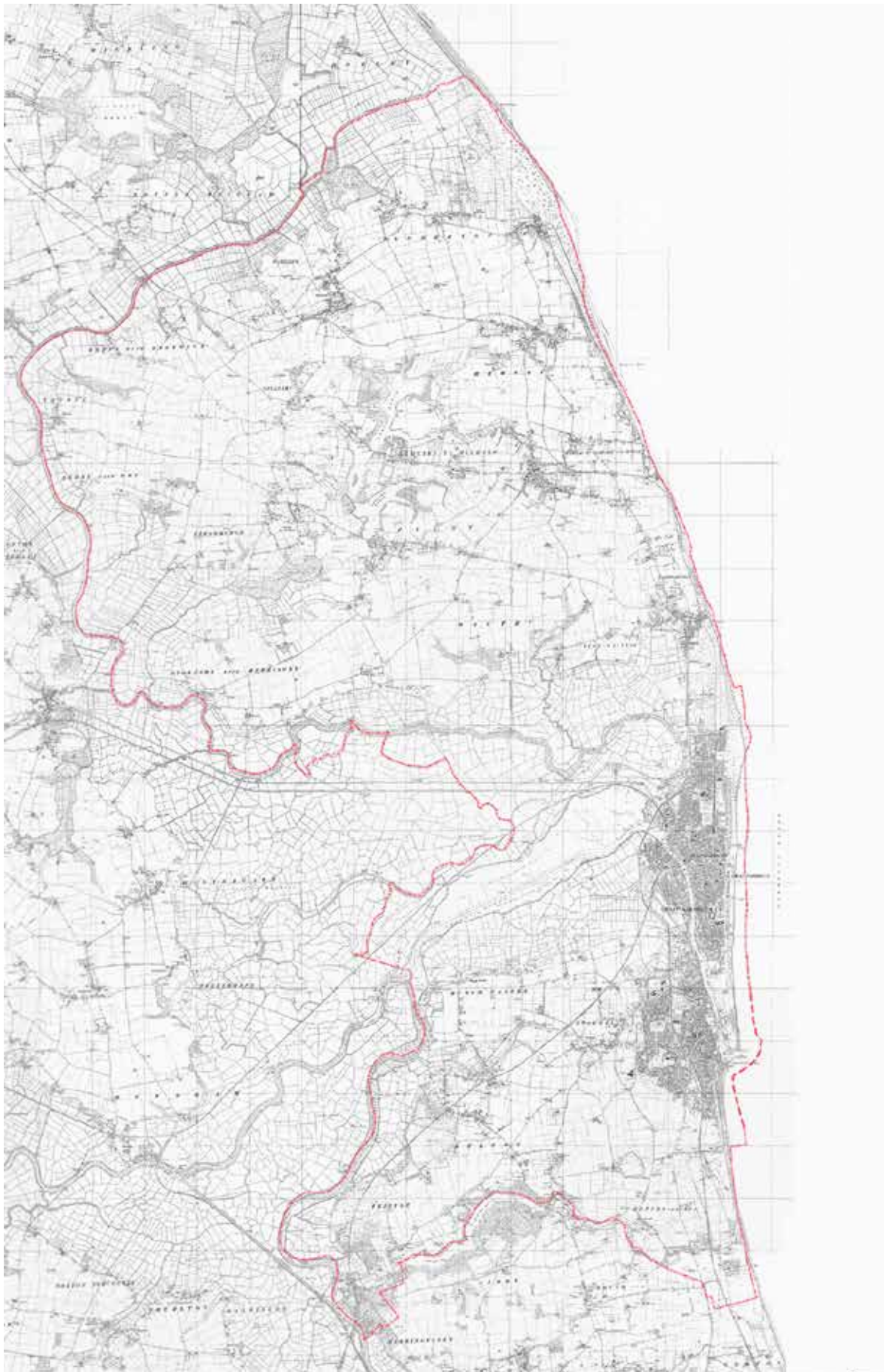


Fig. 6. Ordnance Survey map from 1949. This map can be further explored via the National Library of Scotland website, <https://maps.nls.uk/>

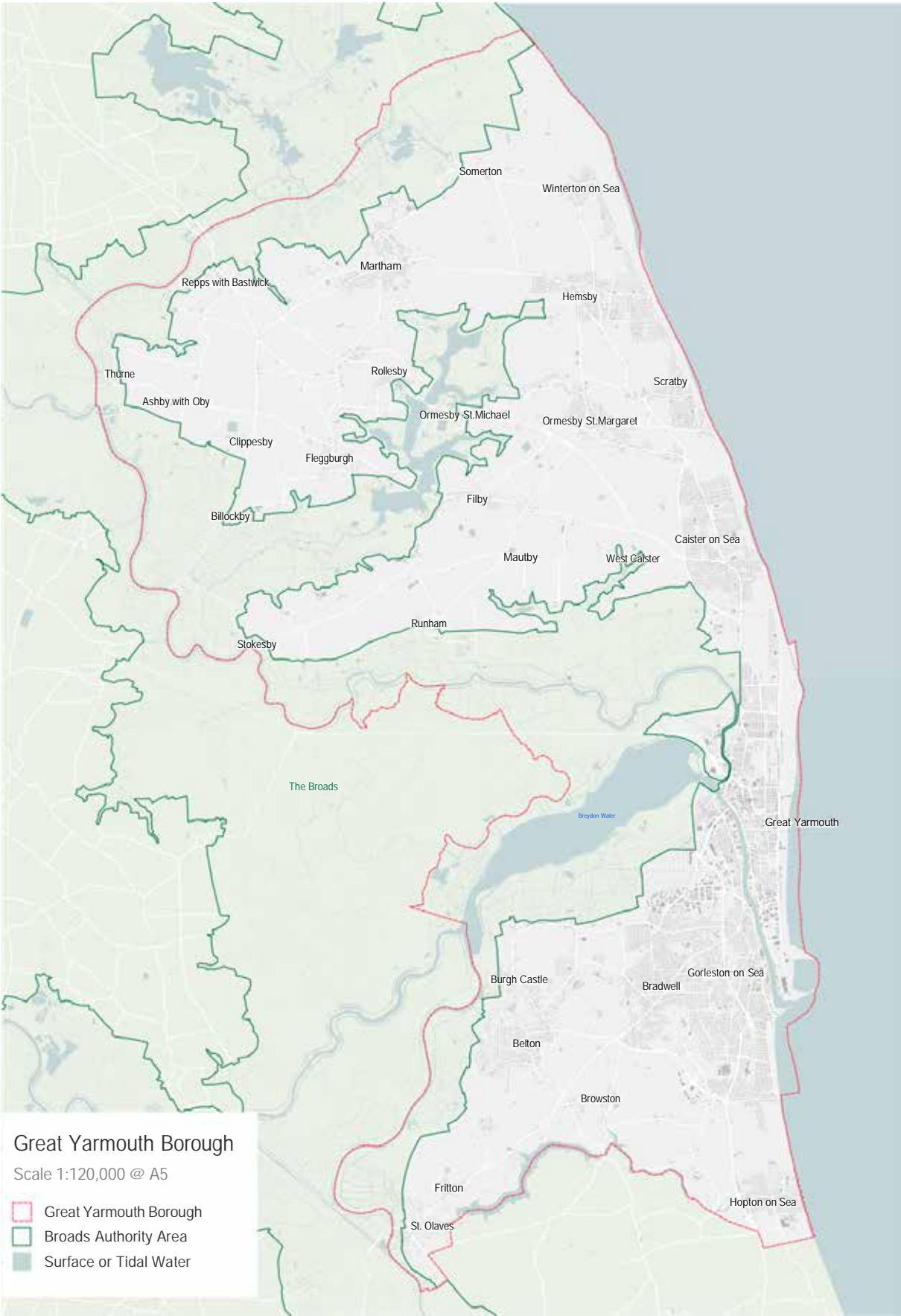


Fig. 7. Map of Great Yarmouth borough, 2023

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>

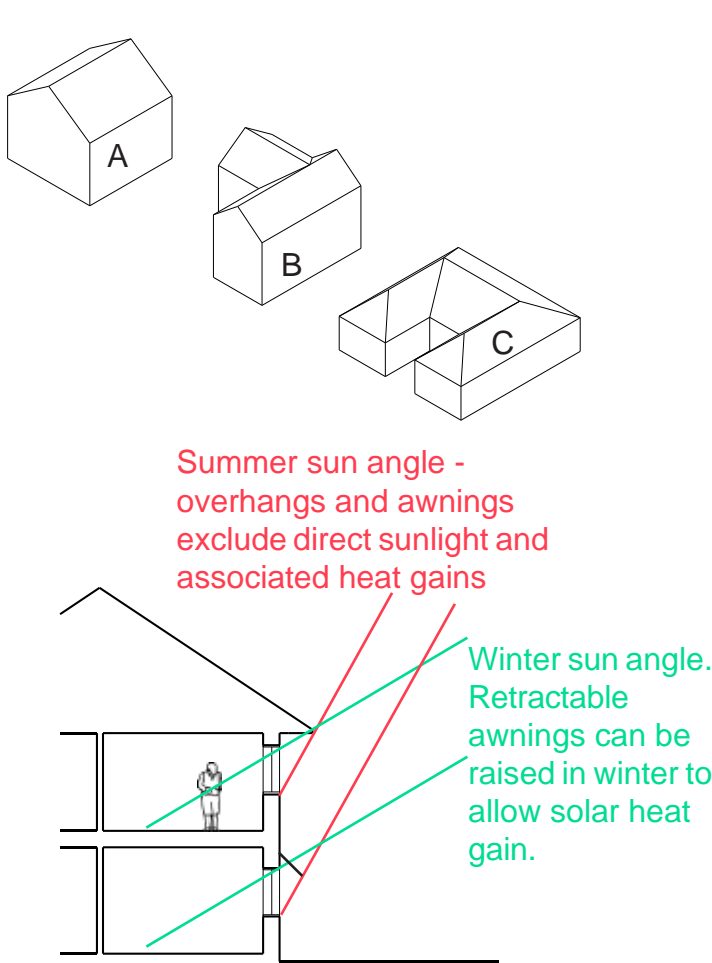


Fig. 9. Diagrams illustrating some of the principles of passive design.

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-snapshot>

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>

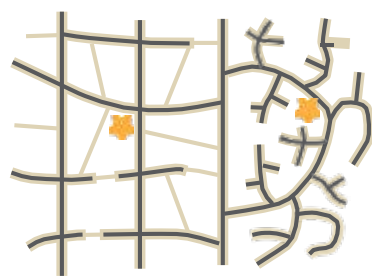


Fig. 16. Diagram showing different approaches to movement networks.

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

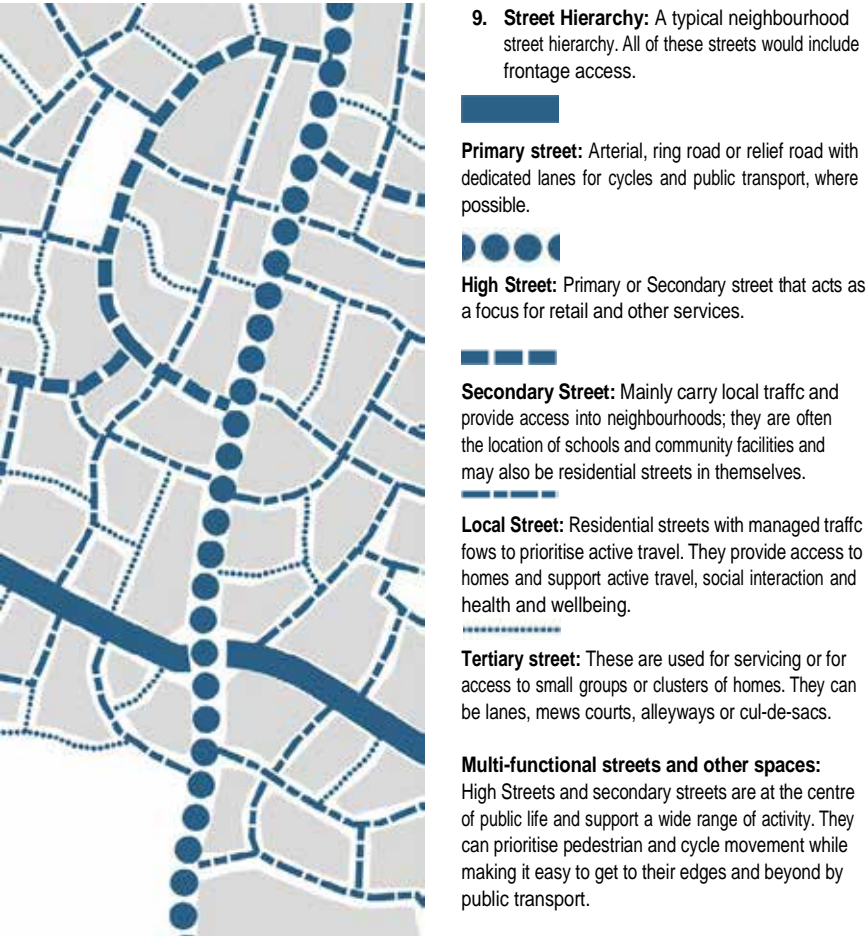
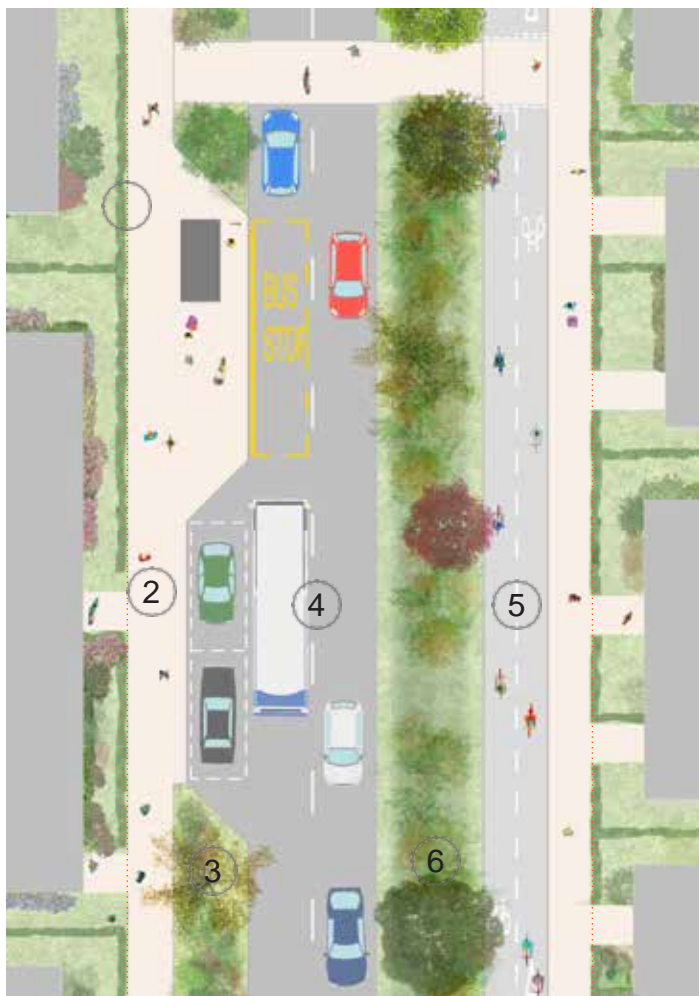


Fig. 17. Diagram from the National Model Design Code illustrating the different levels in the street hierarchy.

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

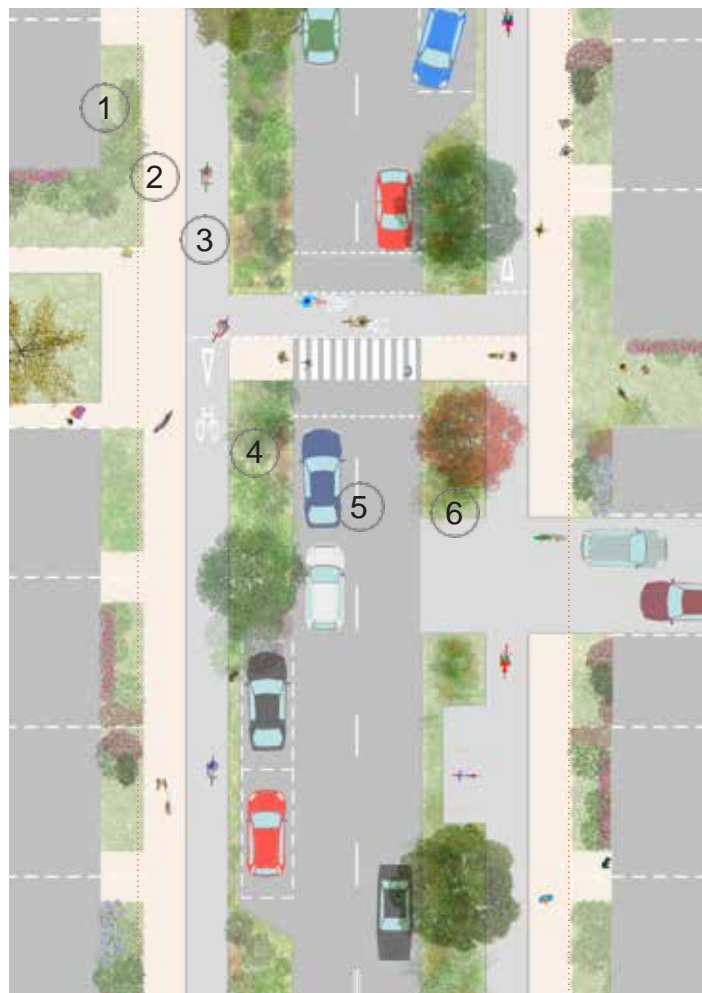


Examples of High Streets with cycle tracks, SuDS, trees and seating alongside necessary vehicle traffic.

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)

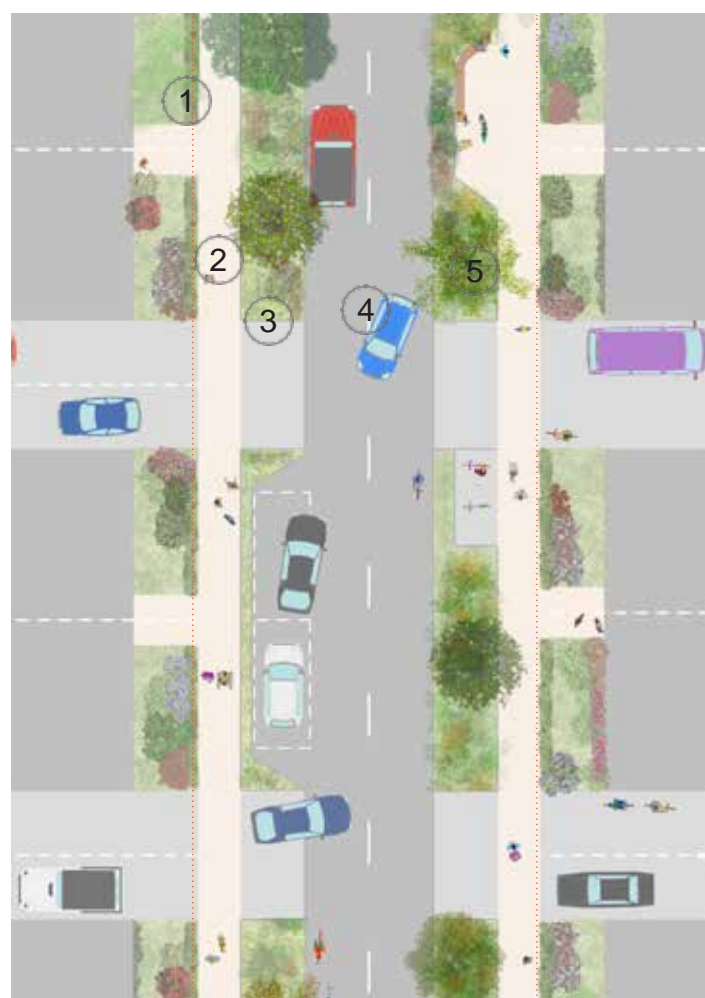
Privately
owned

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



Privately
owned

Public realm
(adopted/unadopted)

Privately
owned

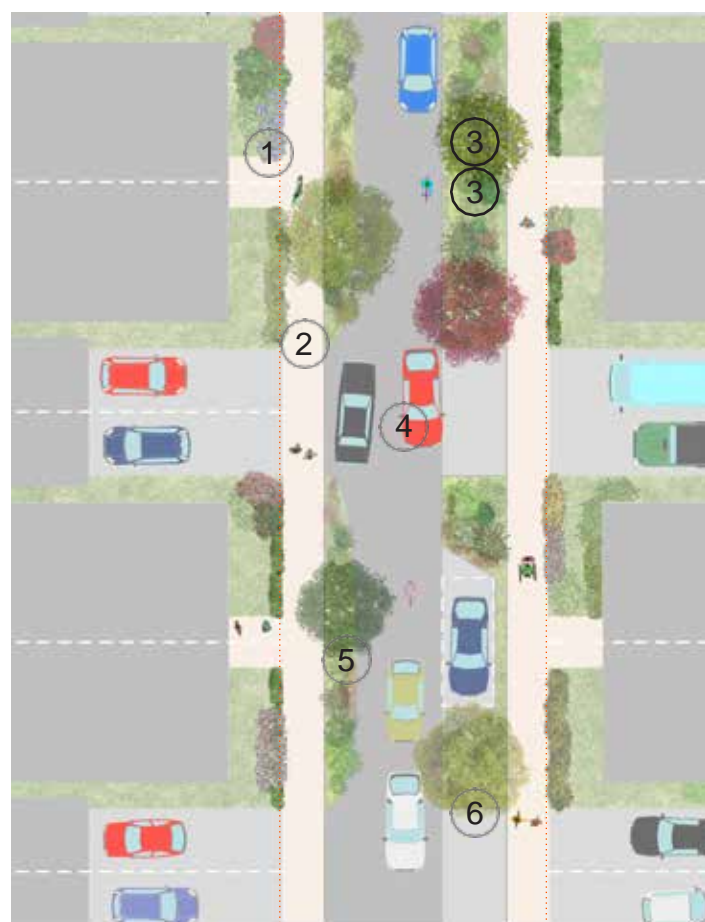
On-street cycling is only suitable for streets with a 20mph speed limit and under 2000 vehicle movements per day

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

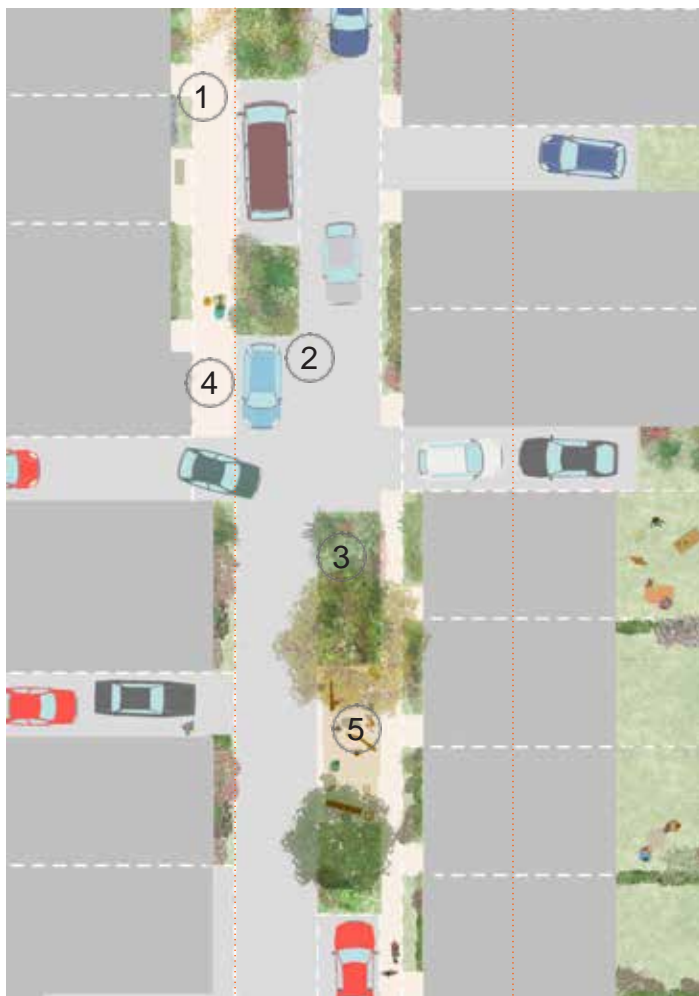
On-street cycling is only suitable for streets with a 20mph speed limit and under 2000 vehicle movements per day

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

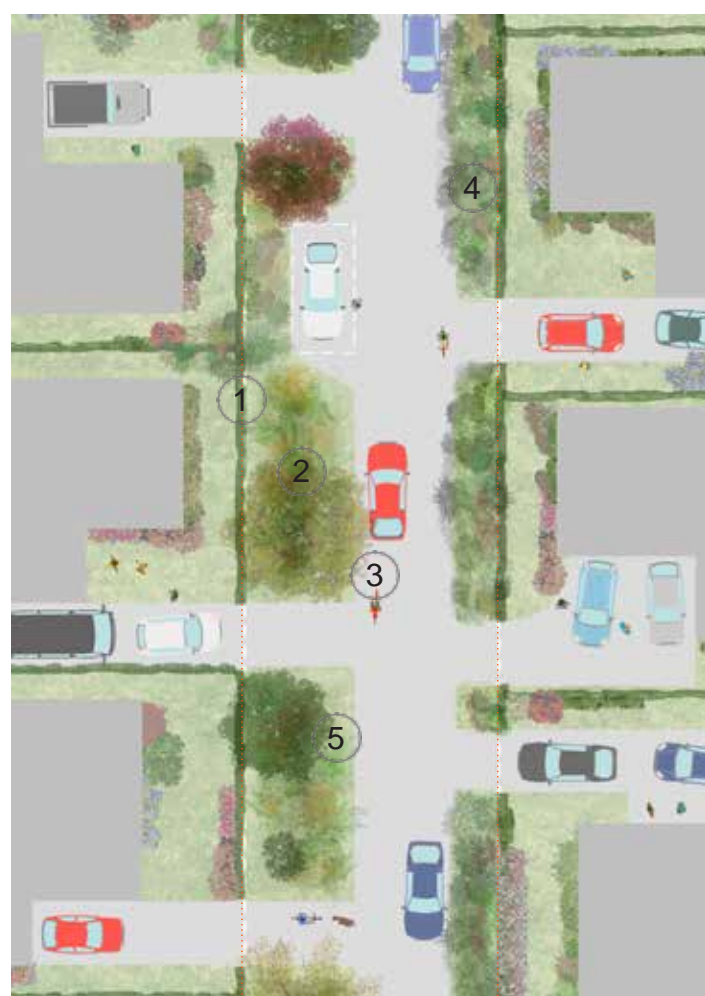
Shared space layouts are only suitable for low-traffic streets with no through route for vehicles.

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)



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

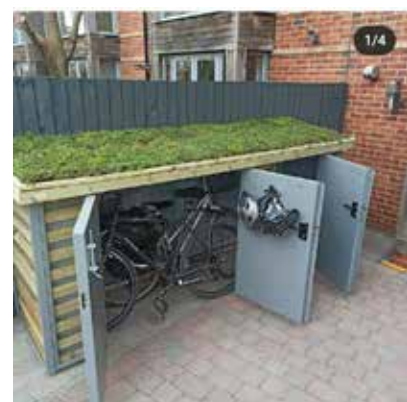


Fig. 26. Examples of attractive and functional cycle storage.

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 SPD² 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

2 https://www.great-yarmouth.gov.uk/article/9521/Open-Space-SPD#_content_

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>

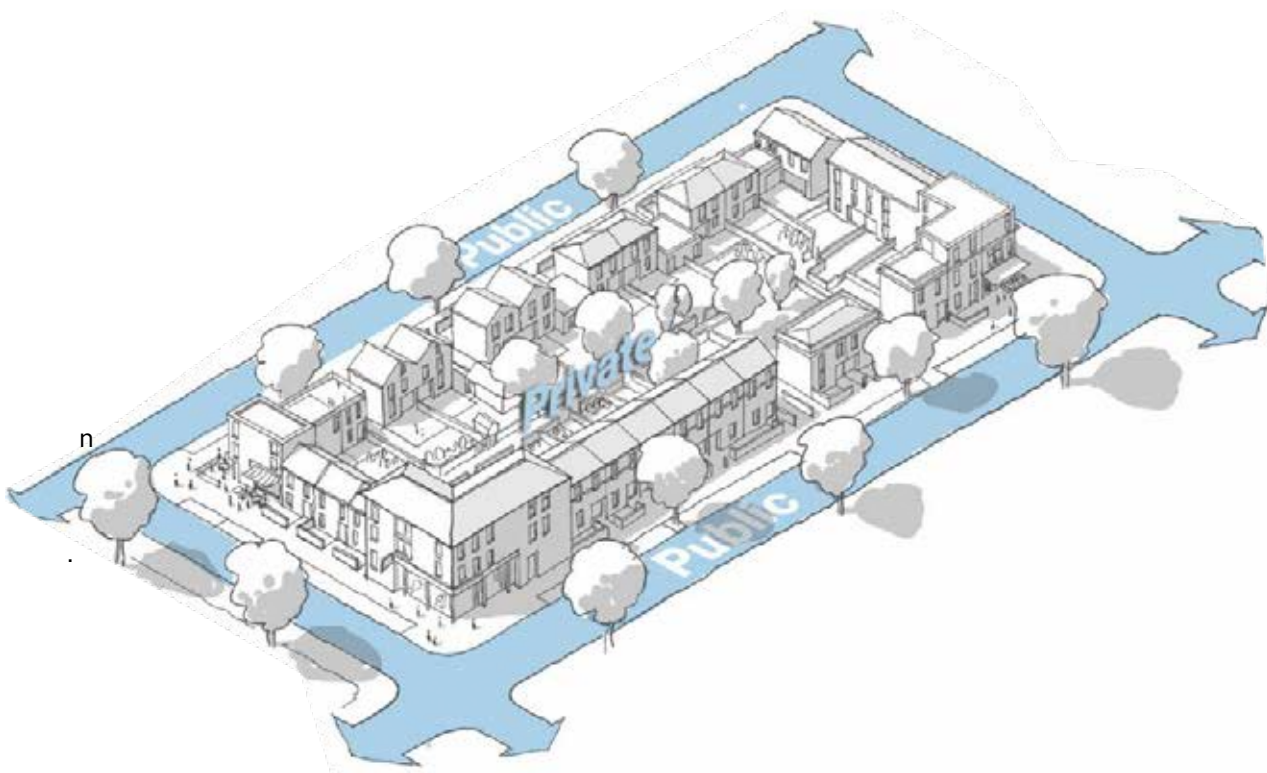


Fig. 33. Diagram from National Model Design Code showing clear enclosure and differentiation between public and private space within a block structure.

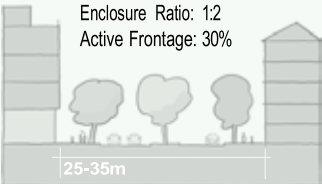
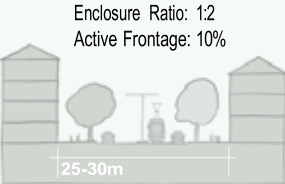
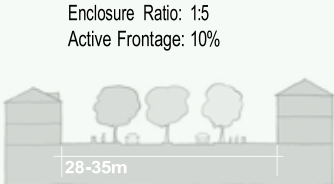

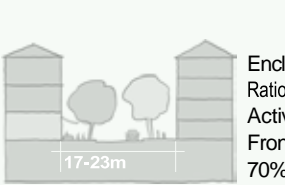
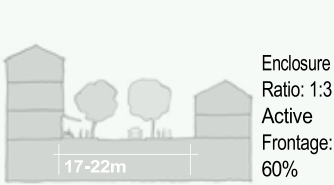
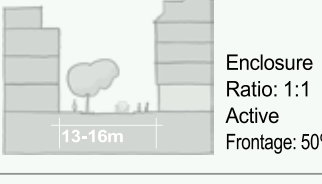


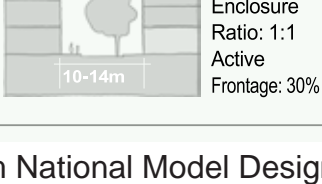

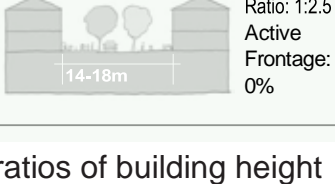
	Town centres	Urban neighbourhoods	Suburbs
Primary streets: Designed to take through traffic and public transport See P.1.i Primary Streets	 Enclosure Ratio: 1:2 Active Frontage: 30% 25-35m	 Enclosure Ratio: 1:2 Active Frontage: 10% 25-30m	 Enclosure Ratio: 1:5 Active Frontage: 10% 28-35m
High streets: 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.

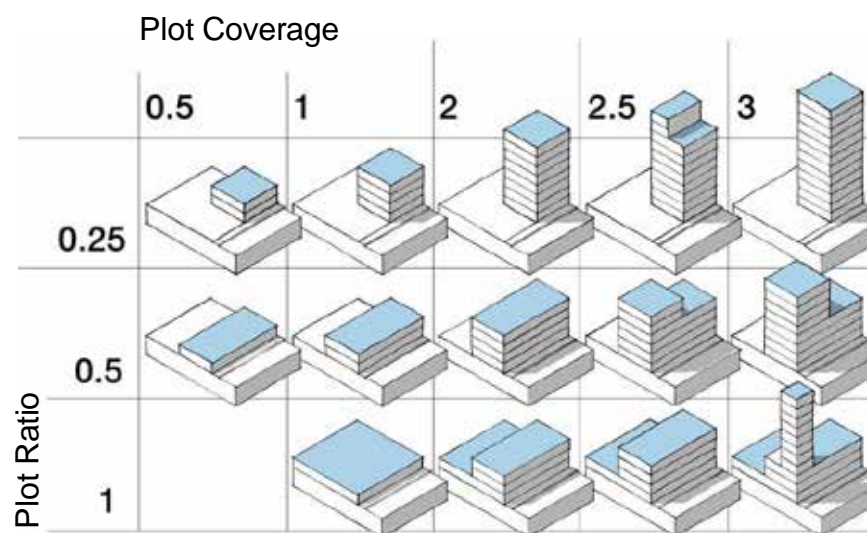


Fig. 37. Diagram from the National Model Design Code showing plot ratio and plot coverage. Plot ratio is the ratio between site area and the total building floor area while plot coverage is the proportion of the site area occupied by buildings.

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>

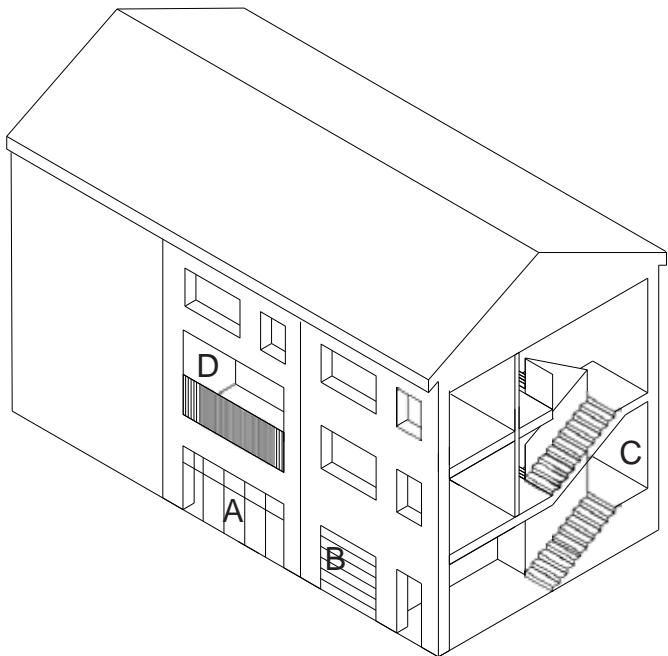


Fig. 38. Diagram showing how to maintain active frontages for development within Flood Zone 3.

- 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>

3 https://www.great-yarmouth.gov.uk/article/7708/Shopfront-Design-Guide-SPD#_content_

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

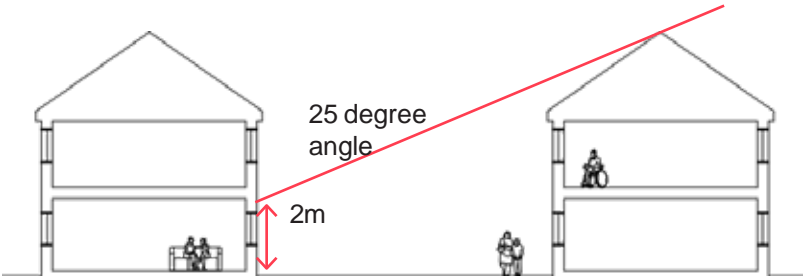


Fig. 39. Diagram showing the application of the 25 degree rule of thumb regarding overshadowing.

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>

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.

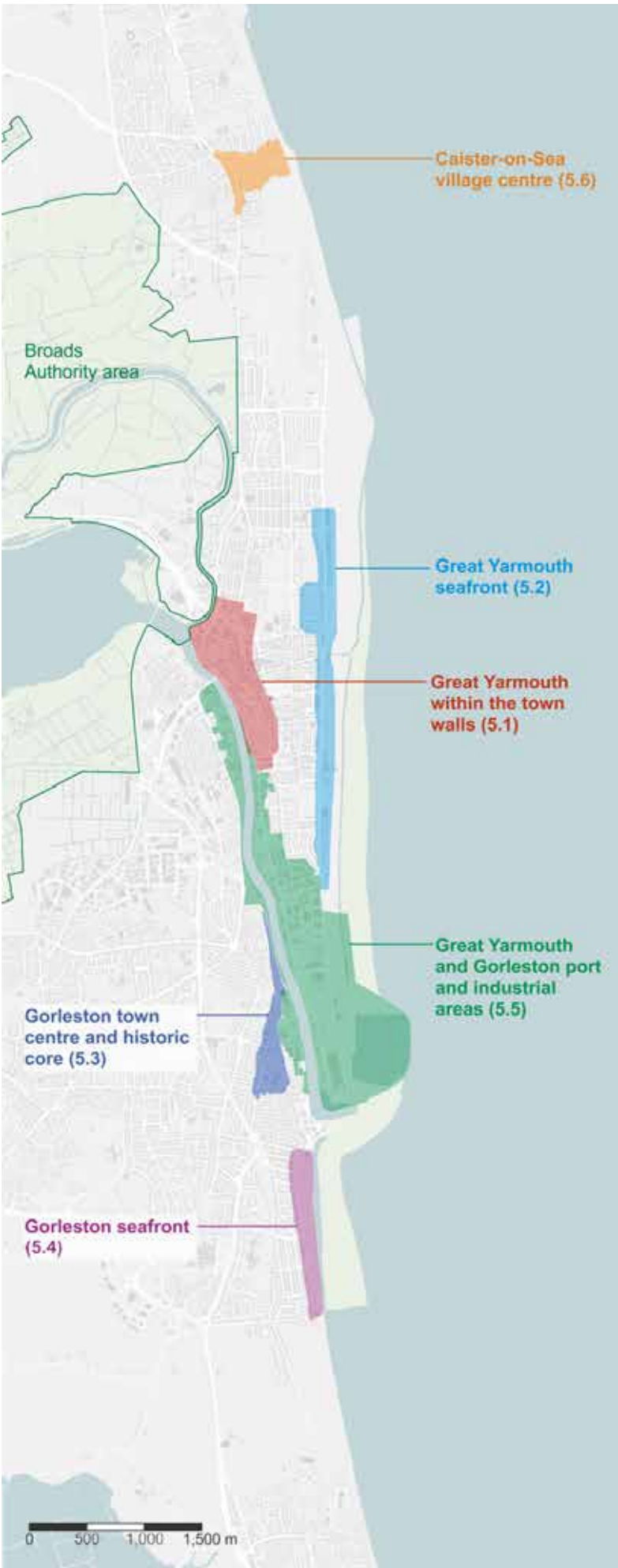


Fig. 45. Map of character areas within the borough. Area types are not shown.

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.

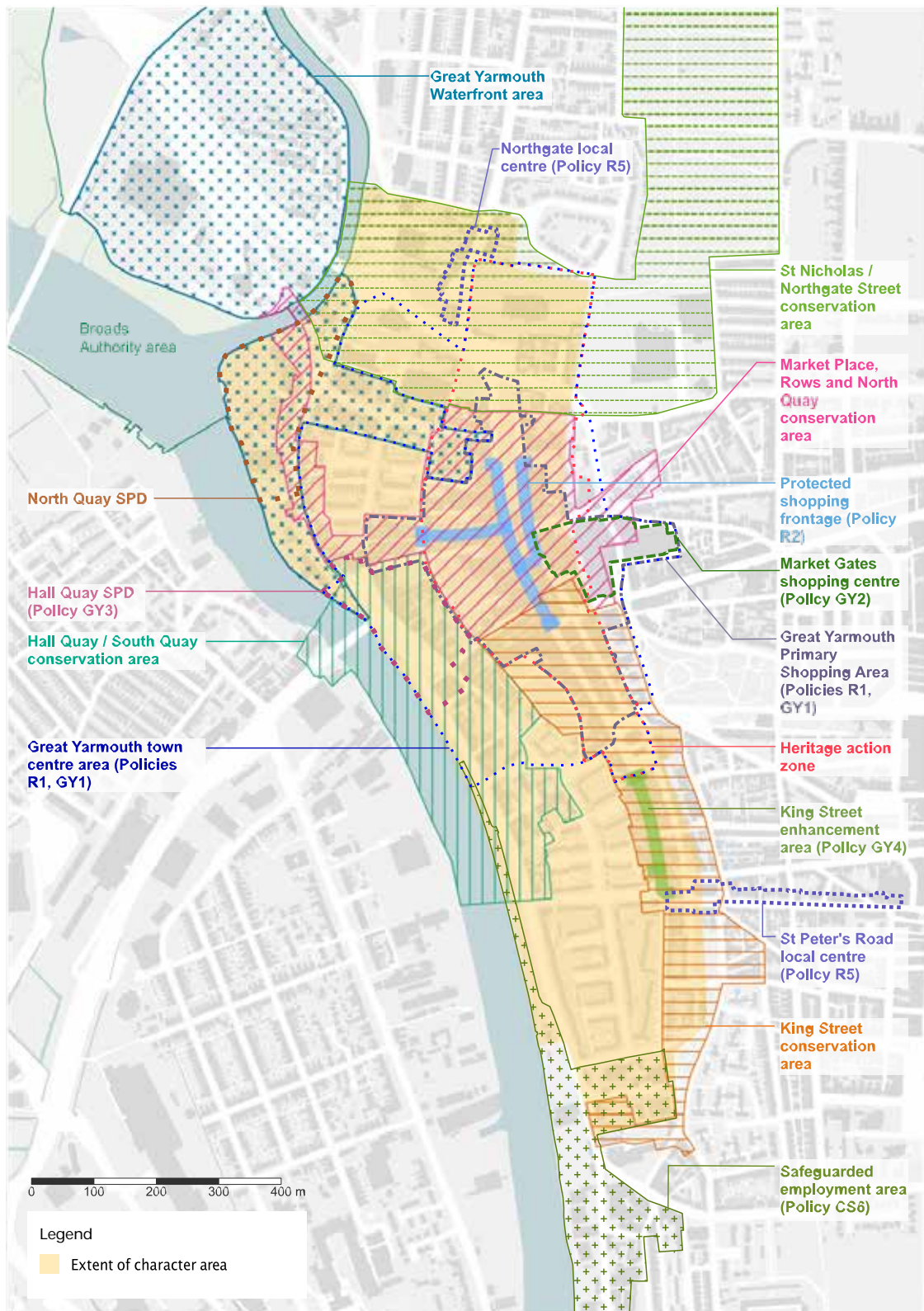


Fig. 46. Map of character area



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.

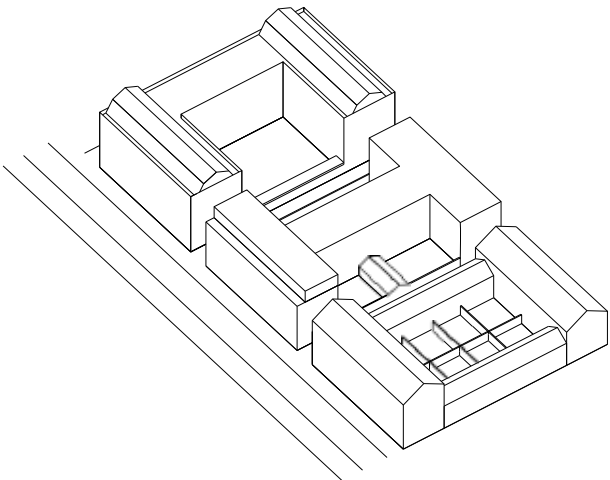
Bottom left: Some well-restored and sensitively infilled streets remain, with new development and adaptation of existing buildings using traditional materials such as brick, pantiles and timber, but car parks disrupt the historic row pattern.

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.

¹ <https://www.great-yarmouth.gov.uk/article/8306/Supplementary-Planning-Document-status>

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

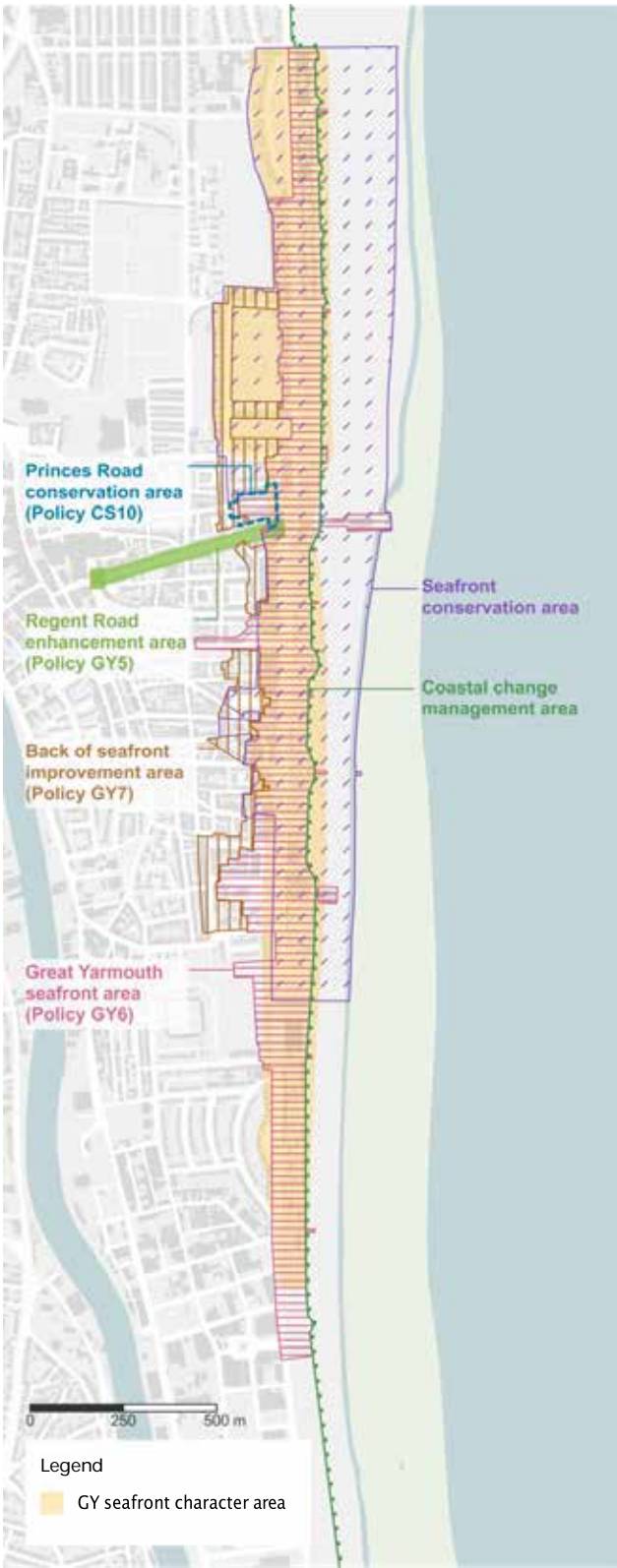


Fig. 50. Map of character area



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>

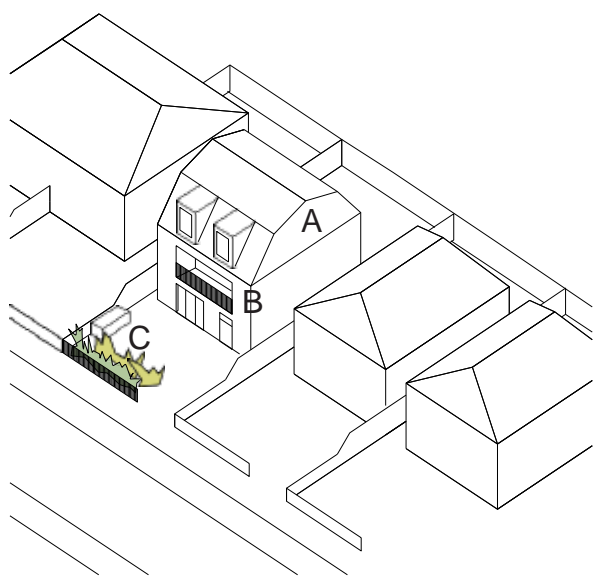


Fig. 52. Diagram showing North Drive infill development parameters

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.

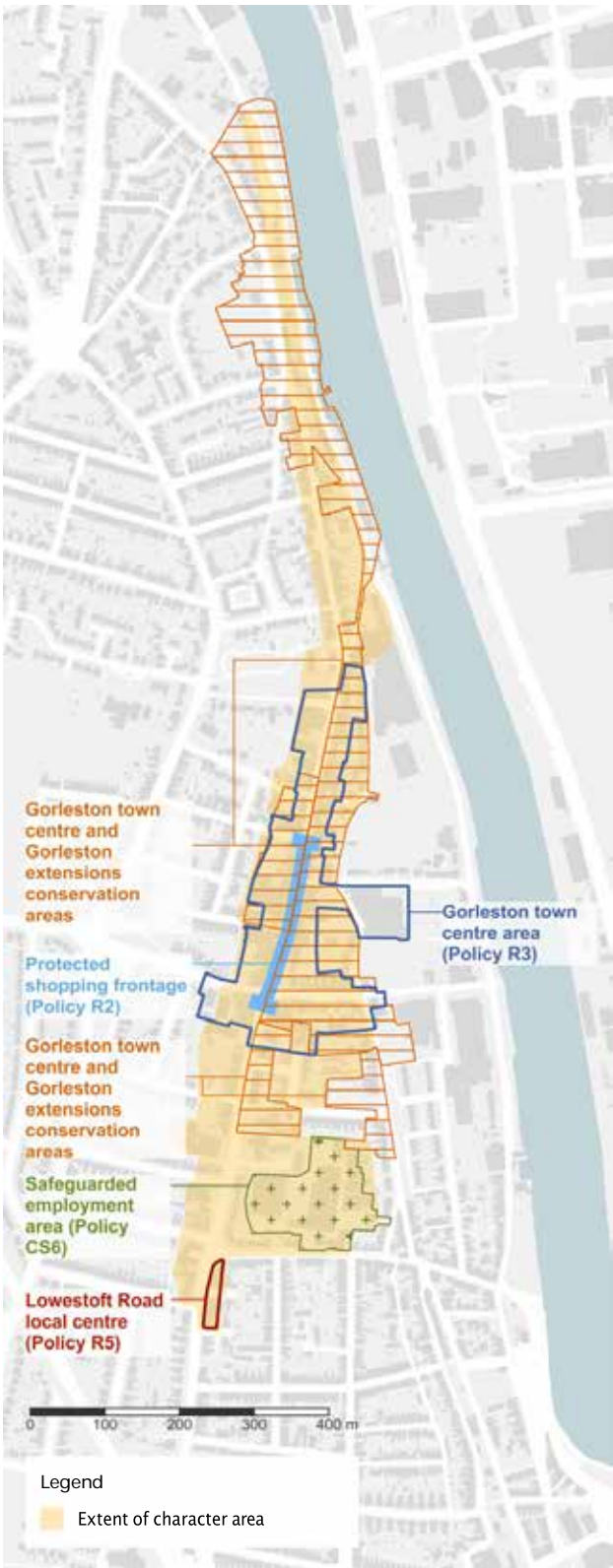


Fig. 54. Map of character area

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.



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.

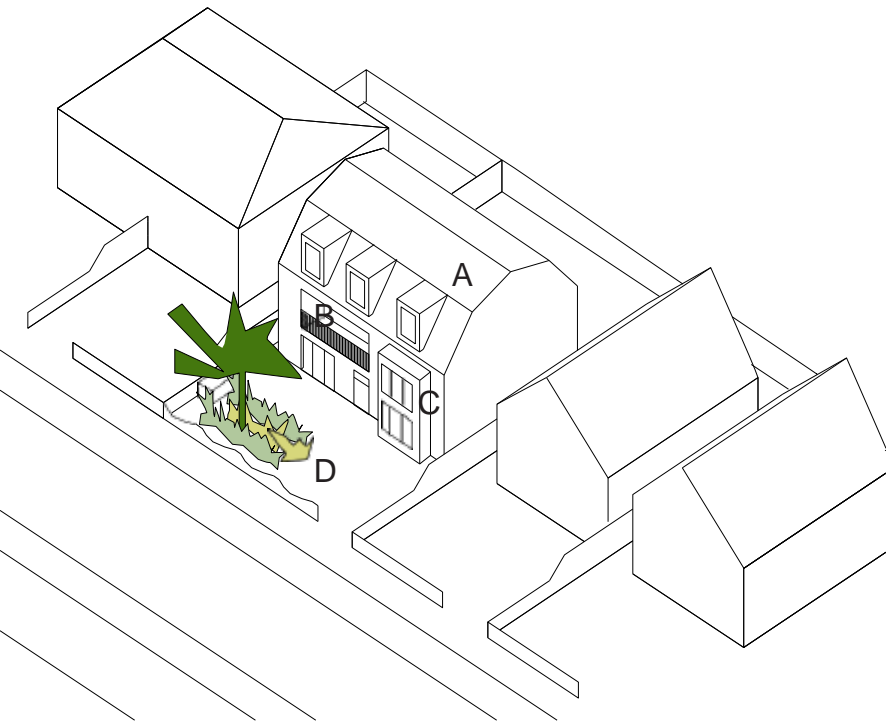


Fig. 58. Diagram showing development parameters for new detached seafront homes

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)	<p>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.</p>
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)	<p>Refuse storage to be provided within building envelope or within the block interior.</p>
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)	<p>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>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 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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53	Diagrams of building height	National Model Design Code
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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 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' criterions 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' criterions 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 criterions 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 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.
- 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 raise’s 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 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 RTPI/ 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

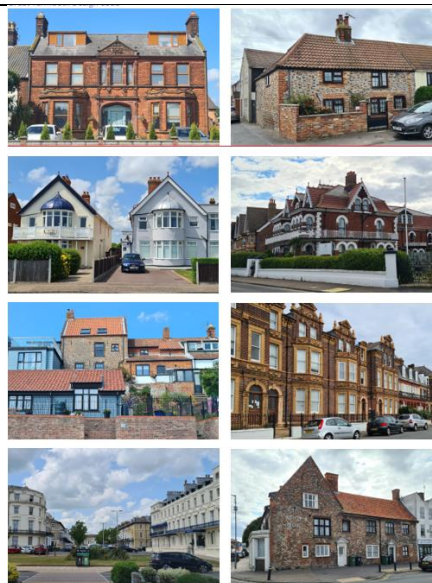
Page of Final (Adopt) Version GY Design Code SPD	Paragraph/ Fig/ Appendix of Final (Adopt) Version of Design Code SPD	Modification/ change suggested by	Modifications/changes made to Final (Adopt) Version of GY Design Code SPD
4.	1.1 Scope and purpose of the Design Code	Internal (GYBC)	<p>Amendments to 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 <u>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: <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: <u>For non-residential development, meet NCC minimum requirements for the amount and design of cycle storage and parking.</u></p>

			<p><u>For residential development, meet</u> 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 <u>one-bedroom</u> dwellings and HMOs, provide 1 resident cycle space per bedspace, and 1 visitor space per dwelling (which can be uncovered/HMO room. <u>For dwellings of two or more bedrooms, provide 1 resident cycle space per bedroom, plus one additional resident space,</u> 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 Grid Property	<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.</p> <p>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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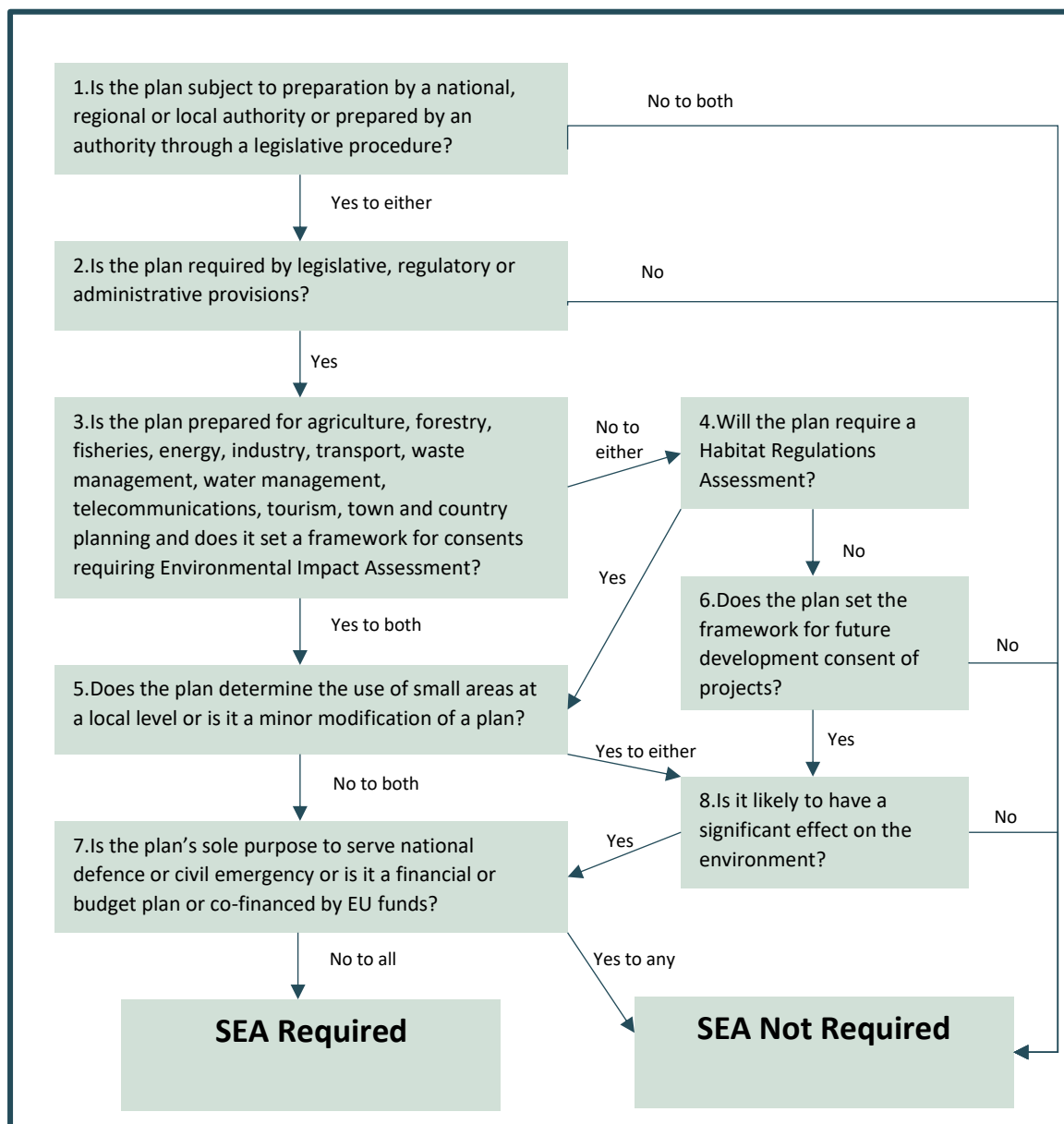
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1. Introduction

- 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.