

PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Monday, 25 April 2022 at the remotely via Zoom at 10.00 am

Committee

Members Present:

Cllr A Brown (Chairman)	Cllr P Grove-Jones (Vice-Chairman)
Cllr N Dixon	Cllr P Fisher
Cllr V Gay	Cllr R Kershaw
Cllr G Mancini-Boyle	Cllr N Pearce

Members also attending:

Cllr L Withington
Cllr J Rest

Officers in Attendance:

Planning Policy Manager (PPM)
Conservation and Design Team Leader (CDTL)
Senior Conservation and Design Officer (SCDO)
Planning Policy Team Leader (PPTL)
Democratic Service's Manager (DSM)
Democratic Services Officer - Regulatory

Also in attendance:

Mr M Sloman – Sharrington Parochial Church

48 APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllrs P Heinrich, J Punchard and J Toye. Cllr J Rest was present as a substitute for Cllr J Punchard; with Cllr E Seward present as a substitute for Cllr P Heinrich.

49 PUBLIC QUESTIONS

Mr M Sloman : Sharrington Parochial Church

Mr Sloman made a statement with relation to Agenda Item 8, and expressed thanks from the Parochial Church Council (PCC) for the third draft revisions. He stressed the importance of churches in being vibrant organisations making significant contributions to communities, and the disappointment that this had not been reflected in the Purcell Report, noting the lack of engagement received by the PCC from Purcell's.

The Chairman responded to the Public Statement and acknowledged that the Church of England had engaged with the Landscape Officer in connection with tree maintenance. The Chairman stated he was satisfied that the recommendations contained within the appraisal were appropriate.

The CDTL welcomed the response from the PCC and advised that comments submitted had helped to inform the appraisal. He commented that the appraisal was primarily a planning tool to assist in the development management process, and stressed the importance of documenting the significance of a particular designation

rather than looking at resourcing and stewardship, however noted aspects of this were considered. The CDTL stated it would go beyond the remit of the appraisal to consider how particular buildings or plots were operated, and that this would result in very lengthy documents.

50 MINUTES

The Minutes of the Working Party held on 21st December 2021 were approved as a correct record.

51 ITEMS OF URGENT BUSINESS

None.

52 DECLARATIONS OF INTEREST

The Chairman declared a non-pecuniary interest in Agenda Item 8, he is the Local Member for the parishes considered within the associated area appraisals and management plan, but advised he had not submitted any comments on the public portal.

53 UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)

None.

54 ANY OTHER BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE

None.

55 GLAVEN VALLEY VILLAGES CONSERVATION AREA APPRAISALS & MANAGEMENT PLANS 2022

Officer Report:

The SCDO introduced the Glaven Valley Appraisal, which sought approval to adopt to the Conservation Area Appraisals and Management Plans for Brinton, Edgefield, Hunworth, Sharrington, Stody and Thornage. These documents had been produced in collaboration with the Council's appointed consultants, Purcells. The Officer stated due to the early designation dates for the Conservation Areas, these settlements had been prioritised as an updated, robust definition and understanding was needed which would aid in informing and assisting future decision making. She advised that the appraisals followed the successful adoption of other settlements further up the Glaven Valley including Holt, Blakeney and Cley-next-the-sea.

The SCDO affirmed the definition of Conservation Area as defined in the Planning (Listed Buildings and Conservation Areas) Act 1990 as 'an area of special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance', and the responsibility of the Local Authority to formulate and publish proposals for the preservation and enhancement of Conservation Areas. The appraisal documents were considered to conform to current Historic England Guidance.

The SCDO advised that a Public Consultation had been undertaken from 22nd November 2021 – 21st January 2022 resulting in 32 responses received from

members of the public, Parish Councils and interested parties. The Public Consultation had been extended to accommodate the Christmas period and ongoing issues with COVID-19, and had been subject to a press release, social media campaign, poster distribution, local exhibitions and Public Meetings held on 15th December 2021 in Hunworth and Sharrington.

Individual Conservation Area Appraisals

With respect of the Brinton Appraisal, the SCDO outlined the proposed changes to the Brinton Boundary which would exclude the Meadow between Brinton and Thornage from the Conservation Area. This was done to allow a clearer definition of the special interest and facilitate the future management of each. Within Brinton, 2 areas were considered for local listing due to making a positive contribution to the area.

The SCDO commented that the Edgefield Boundary review was subject to areas of inclusions and exclusions, some of which were modern buildings which were not thought to contribute to the special interest. The addition included a farmstead to the south, as well as the Church, which was a listed building. She noted that there were proposed additions to the Edgefield local listing, and highlighted a semi-detached pair of houses which were considered to be worth recognising.

The SCDO stated that Hunworth was also subject to a mixture of inclusions and exclusions from the boundary review, and that Officers considered the Mill would be better aligned with the Glaven Valley Conservation area given its industrial significance. She noted that there were no buildings proposed for Local Listing.

With regards to Sharrington, the SCDO advised that the Boundary review was considered to tidy the affected boundaries and would include the addition of some parcels of land to the north which would better rationalise the area. The SCDO highlighted some of the proposed properties which would be included within the Sharrington Local Listing including pairs of estate workers cottages. The Chairman expressed his concern and the concern of residents, that the proposed Sharrington boundary would dissect the village pond located to the east of Ash Yard. The SCDO commented that this was an oversight and could be amended.

The SCDO commented that Stody Village was unique being the only village within the Glaven Valley which did not have its own designated Conservation Area. She advised that Officers recommended Stody be given its own designated Conservation Area, which would encompass the historic village core around the Church, buildings along Brinton Road and the important historic farm buildings to the North West. The Village Hall was the only building recommended for Local Listing.

The SCDO spoke to the proposed changes to the Thornage Boundary, and noted that the largest change had been detailed earlier in the Brinton appraisal.

The SCDO summarised the next steps, and the reaffirmed Officers recommendations.

Member Debate

- i. The Chairman thanked the Conservation and Design Team for their report and affirmed that the Conservation Appraisal was necessary as the Council had a statutory responsibility under the Planning (Listed Buildings) Act 1990 to regularly review and upgrade Conservation Areas. He considered the

costs associated with the appraisal included engagement with other villages, not simply the 6 listed, and covered the Glaven Valley Rural Area review; to follow later in the year. The Chairman asked how the planning process differentiates with local and national listed buildings.

The CDTL advised that nationally listed buildings were subject to range of controls externally and internally and that they would require listed building consent for a complete demolition. Local Listed Buildings did not have the same controls and were a reflection of buildings which were considered to be of a higher quality than the average building, and which provided a positive contribution to the local setting, but not of such significant architectural or historic interest to justify national listing. He advised for planning purposes, within the NPPF, the Council were obliged to give weight to reduce the harmful impact an application may have to a listed building or Conservation Area. Planning permission would be required for the demolition of an unlisted building within a conservation area as it would constitute relevant demolition.

- ii. The Chairman expressed his concern that there had not been a generous amount of time afforded to Members over the Easter Holidays to consider the appraisals and that the Planning Portfolio holder was not in attendance as it was the Easter Holidays. He reflected that it was a substantial document containing some inconsistencies, including, as an example, regulations for managing trees within the Conservation Area which didn't stipulate height. He considered that there were likely more which could be missed due to a lack of time provided to Members to proofread. He stated that it was important to ensure the appraisals were right and he was nervous to recommend the appraisals to Cabinet at this stage.
- iii. The CDTL responded to the Chairman's comments that there were inconsistencies with the current boundary's, advising Officers were conscious to ensure that the villages were dealt with first before the wider landscape designation. The CDTL considered that these were two separate matters which required specific focus and separate consultation periods. He advised that if Members felt comfortable to provide Officers the Authority to make minor, modest, textural changes, including inconsistencies surrounding trees if needed, these could be arranged which would not materially change the substance of the appraisals.

The SCDO advised that amendments to textural inconsistencies could be made to the report consistently, rather than aspects only appearing in one appraisal, noting this had been an oversight which could be easily rectified.

- iv. The Chairman asked that a glossary be added to the revised document for ease of use. The SCDO confirmed this could be arranged.
- v. Cllr N Dixon enquired whether the submission made by Mr Sloman had been addressed by the Local Member. The Chairman affirmed he was the Local Member and that there had been discussion within the Parish Council, who Mr Sloman had also engaged with also, about the points raised. He advised the Member of the Public had not engaged with himself directly prior to the meeting.
- vi. Cllr N Pearce shared concerns expressed by the Chairman, and considered that the documents would have a significant impact over an extended period of time. He stated it was important to ensure the documents were right and

considered it better to defer decision making till clarification was sought.

- vii. Cllr R Kershaw agreed that there had not been enough time afforded to give due attention to the documents.
- viii. The PPM noted that specific inconsistencies had not been detailed other than concerns relating to tree measurements, which he considered to be trivial and could be resolved under delegated authority. He contended that the only matter raised by Members which would materially change the document was with regard to the inclusion or exclusion of a pond at Sharrington, which Officers had agreed to include following omission. The PPM did not consider that deferral was necessary but acknowledged that these were weighty documents.
- ix. Cllr P Grove-Jones supported Members comments and stated it had been impossible to read and assimilate a 700 page document in limited time due to the Easter Holidays. She commented it was a detailed report, excellently presented, but as she had not had the time to read the whole document she felt uneasy to recommend its approval to Cabinet.
- x. The Chairman acknowledged that some of the inconsistencies were minor which he had picked up when reading through the document, but considered that given the lack of time afforded to Members to study the document, not all inconsistencies may have been picked up. He considered more time would allow for the document to be given the proper attention required of it, and the justice it deserves.
- xi. The CDTL commented that this was not the first time that these documents had been brought to the Working Party, noting that, to a large extent, the document had been approved by Members in its draft form which had been publicly available via consultation. The CDTL affirmed that the structure of the document remained the same, without legislative issue. In response to questions from Members, the CDTL advised there would be no issue in delaying recommending the report, as it would not fall foul of any official time-scales, acknowledging the next meeting was planned for the following month.

The SCDO asked, should the item be deferred, that Members submit their comments to Officers ensuring amendments could be made in advance of future agenda publication.

- xii. Following further discussion from Members, The Chairman suggested deferral of the item to the following meeting and that comments be submitted to the Conservation and Design Team within the next 10 working days.
- xiii. Cllr V Gay stated that the deferral was not a criticism of the Officers, and commented that this was a demanding piece of work which Members were grateful for.
- xiv. Cllr N Dixon stated he was satisfied with deferral, and asked that the full 700 page document not be re-issued, rather a summary of updates be provided. The PPM agreed that a scheduled of changes would be presented to Members rather than re-publication of all documents. Purcell could be instructed post-meeting, once changes had been agreed, to make their amendments.

- xv. Following advice from PPM and DSM about the correct procedure for deferral, the Chairman proposed deferral of the Item to the next meeting to enable Members to better study the document and enable Members to supply comments to the Conservation and Design Team about the textural inconsistencies within the document, seconded by Cllr Pearce.

UNANIMOUSLY RESOLVED by 9 votes for.

To defer the Item to the next meeting of Planning Policy Working Party.

56 NUTRIENT NEUTRALITY

The PPM spoke to the Officers Report, and acknowledged that Nutrient Neutrality had significantly impacted the district and county with respect of planning applications. The guidance, introduced by Natural England, related to the protection of habitat regulations and aimed to curb the discharge of nitrates and phosphates into the Wensum and Broad's water system, both of which are designated Conservation Areas. The Local Authority were obliged to ensure its activities did not have an adverse impact on the receiving water course, including through the granting of planning permission for additional overnight accommodation. At present, Anglian Water were licensed to discharge 'dirty water', into the Wensum and Broads Water systems, which was objected by Natural England, who considered the water courses to be in an unfavourable condition, largely due to nutrient enrichment. As a consequence the water lacked sufficient oxygen and had an adverse impact on wildlife, contrary to the habitat requirements. As this was Primary Legislation, any Local Plan or planning permissions granted which failed to address the issues outlined were considered to be unlawful.

With reference to the Local Plan, the PPM advised that with Nutrient Neutrality being a new policy, it was not currently referenced in the emerging Local Plan which would require significant revisions in order to be considered lawful and sound. In its current form it would fail to satisfy the expectation of the Planning Inspector.

The PPM considered several changes would be required to the emerging Local Plan. First, a review of the Habitat Regulations Assessment by the independent consultant. Second, to state within the Local Plan that no development may take place in the affected areas unless concerns related to Nutrient Neutrality were addressed and mitigated. Mitigation measures themselves would need to be outlined. Lastly, development viability, as there would be impacts on developers which may affect affordable housing schemes.

He anticipated this matter could take between 6-9 months to overcome, but that it was more likely to last in excess of year before a clear, sufficient understanding was made which would hold up against Local Plan evaluation.

Members Debate:

- i. The Chairman advised that he had attended a Norfolk Strategic Planning Framework Meeting with County Cllrs, and other district Cllrs on the 14th April, noting that Legal advice had been taken, and that no recommendation had come from the government which considered Planning Applications should be paused.

The PPM affirmed that Natural England were advisors, who advise the government and local authorities, and whilst they were not decision makers

they were considered the competent authority. The threshold for the Habitat Regulations was stipulated as 'beyond reasonable scientific doubt' applying the precautionary principle, a high standard to overcome. He stated that various parts of the district may be more affected than other areas, and developers would need to consider mitigation of discharge of water waste including what interventions could be made at different stages. The PPM advised the Authority were anxious not to delay decision making for Planning Applications for any longer than was necessary. He advised this item was brought to the Working Party due to its impact on the Local Plan, and the subsequent delays anticipated.

- ii. Cllr S Seward thanked the PPM for his report, and acknowledged that the Local Plans of many local authorities would be affected. He considered it important that Planning Applications affected still be looked at by Officers so that when decisions could be made once again, they were done without additional delay.

The PPM stated that the Council were still accepting Planning Applications, which was not the case for other authorities. The intention remained to deal with each application and address all other issues up to the point of decision.

- iii. Cllr V Holliday asked what implications there would be for those areas of the district not affected by the Natural England guidance.

The PPM advised that there was a requirement for Local Authorities to have a 5 year housing land supply of housing growth but as around 2/3 of the district was affected by Nutrient Neutrality, this would have a significant impact. He commented, where a Council does not have a 5 year housing land supply, it must apply the 'presumption in favour of sustainable development' to determine planning applications. This would provide a tilted balance that developers should receive planning permission for those areas of the district not affected by the advice unless the harmful impacts were considered very significant. The PPM advised that the Authority would be obliged to give permission in locations it might not otherwise want to, because it does not have a 5 year housing land supply. The Council could consider the suspension of the presumption, because the circumstances were not of its making, and noted that much of the remaining area of the district not affected by Nutrient Neutrality was covered by the AONB, which would give good grounds to resist development, irrespective of the expectation for presumption. He anticipated plans would be brought forward by developers on land which had not been designated for planning permission.

- iv. Cllr J Rest asked that an all member briefing be organised, and where possible parish councils and developers be invited to aid their understanding. The PPM advised he would pass this request on the relevant managers.
- v. Cllr N Pearce asked what could be done to alleviate the problem of 'dirty water' discharged by Anglian Water. The PPM advised, whilst he was not an expert, he understood that developers were not permitted to fund direct capital works for sewage treatment works. The Water Services Regulation Authority (OFWAT) had been requested nationally to look at changing this rule to permit developers to directly fund works. This may be one solution. In addition the Government were considering the re-opening or the current 5 year Investment programs to look at those areas which suffer with Nutrient

Neutrality. Conversely, some of the sewage treatment works were not capable of improvements, therefore irrespective of funding they could not be made any better, but would continue to discharge water into water courses with phosphorous and nitrogen exceeding permitted levels. The PPM advised other considerations must be made either before the water reached the sewage works or after when it end up in the water course. This is where the nature-based solutions including recreating wetland habitats were gaining interest. Other polluters including farmers were also affected by this policy. The PPM advised this policy had been implemented in the West County previously and some learning into best practice had been made, which was encouraging.

- vi. The Chairman relayed to Members that Anglian Water would be in attendance for the upcoming Overview and Scrutiny Committee in May, where Members would be afforded the opportunity to raise questions.
- vii. Cllr G Mancini-Boyle asked the PPM if NNDC had raised a legal challenge to Natural England's advice, and stated his belief that this issue hinged on Anglian Water being over capacity, commenting that developers must take responsibility in developing schemes to address the problem before the water/waste is passed on to Anglian Water. The PPM commented that there was an appetite to submit a legal challenge across all Norfolk Authorities in a united way. More broadly, he advised that the responsibility over the water quality rested with us all, be that in the use of detergents, flushing of toilets etc. For larger sites, developers would likely be able to come up with mitigation strategies on site whereas small scale developers may have to look at off-site mitigation proposals, similar to the GIRAMS policy. Cllr G Mancini-Boyle expressed his hope that developers would be more innovative to address issues.

Members noted the Officers recommendation for the potential implications of Nutrient Neutrality on the timeline for preparation and submission of the Local Plan.

57 LOCAL PLAN - VERBAL UPDATE

The PPTL provided a verbal update to Members on the Consultation on the Local Plan and Work Programme, which did not reflect Nutrient Neutrality. He advised that the regulation 19 Consultation period closed in February and that 404 responses had been submitted on the portal with a further 106 letters/emails received. Roughly 64% of the submitted responses were in the prescribed format, but as many of the responses were not in the prescribed format and referenced specific sections, therefore additional work would need to be undertaken.

The PPTL advised that the team were currently engaged with other work, and that responses to the consultation period would not be looked at till May. This was behind the targeted time and was due to unexpected increases in workloads caused in part by Nutrient Neutrality and the introduction of the GIRAMS Tariff.

He advised that the Local Plan had been broadly supported, and that where there were issues of soundness and legality, they were not considered to be key and were instead based on perceptions.

The PPTL generalised that comments and objections focused on infrastructure provision accompanying growth, and the belief that no growth should occur till

improvements to roads and health care provisions were made. The site which received the greatest number of representations was C22 2 in Cromer.

Responses from Statutory Bodies

The responses received by statutory bodies were broadly supportive with the exception of Broadland District Council which raised a specific legal challenge around the wider off-site highways impacts and improvements due to North Walsham West which would need to be factored into the final plan.

He commented that Natural England raised an objection to air quality, and suggested that further research be undertaken with regard to traffic levels in close proximity to road networks, and requested that various policies including ENV6 and C13 were linked in this matter. The PPTL stated he understood this matter had already been looked at by the Council, but that additional investigations were required.

With reference to Historic England, the PPTL commented that they were in support with many of the inclusions within the draft local plan, and particularly liked that a historic impact assessment had been undertaken. They encouraged findings be replicated verbatim in the document. The PPTL acknowledged there had been some issue with staff turnover affecting consistency with respect of wording used, and that Historic England had provided modified language it suggested be used. This would need to be considered by Officers going forward. Additionally Historic England would prefer that each Heritage Asset be considered individually rather than be considered in a broader context, this too would need to be given further consideration by Officers.

The PPTL commented that the Statutory Health Body welcomed the Local Plan, and advised that they would be changing name to Norfolk and Waveney Integrated Care System in July 2022, which they wish to be reflected in the Local Plan.

He advised that Norfolk County Council were supportive but sought minor amendments and or clarifications to specific access points at 2 locations.

The PPTL commented that the NPS objected to the designation of the Playing Field at Holt belonging to the primary school and by extension Norfolk County Council, being designated for Housing. He advised that NCC had indicated support for this land to be used for housing in future however it was envisioned that the designation for this site would remain as 'Open Land'.

He stated that the Environment Agency had questioned the use of an indicative housing allowance for the small growth site of Horning, which they considered to be potentially undeliverable. The PPTL commented that, on reflection, this view was accepted and a minor amendment would be made.

With reference to Anglian Water, the PPTL commented that they supported the overarching vision for climate resilient sustainable development and in directing growth to major settlements. Anglian Water had sought to include any assessments and Local Planned Growth in its Wastewater Management Plan 2025-2030, however following that plans objection by OFWAT, it was determined that only adopted Local Plan Policies, and not intended, would be considered. The PPTL relayed that Anglian Water had advised they could accommodate significant growth in both Cromer and North Walsham, and that there was infrastructure development planned for Fakenham. There was potentially some future improvements required at other

waste water recycling sites around Holt and Mundesley but Anglian Water did not consider this to be an issue.

The PPTL advised the above were a snapshot of the comments made by statutory bodies, and stressed that Officers had yet to go through submissions made in detail.

Works Programme

The PPTL informed Members of the next steps and where the Planning Policy Team were at with respect of workload. He commented that the team were soon to start on splitting representations received into policy areas and would transcribe into schedules with each policy area reviewed against comments. From its current position till submission, work of Officers would be in a prescribed format as the Council had effectively published its draft Local Plan. Any modifications made going forward would need to be justified and evidenced, detailing whether they were minor or main modifications.

Main Modifications would require large scale changes and this work would be undertaken where the issue affected soundness or a legal challenge. Main Modification changes would likely lead to further consultation which would need to be supported with further documentation, and signed off by the Council. He commented that this could only be determined when the substance was known, and affirmed the team had yet to study comments.

The PPTL explained the intention to produce 5 schedules:

1. Detail the Responses verbatim.
2. Detail amendments received by individuals in alphabetical order.
3. Main Schedule - detail the received modifications and Councils response including if a modification required by Officers, and to submit this for proposal by Council.
4. Translate the schedule into proposed minor and main modifications, to be provided to the Planning Inspector with an audit trail and justification of amendments.
5. Transpose track changes and submit to examiner.

The PPTL advised that the team were very busy looking at background papers and various other streams of work for submission. Updating background papers and site assessment booklets was ongoing, including approach to setting employment policies, housing targets, and distribution of growth, approach to wind energy, historic environment and settlement boundary review.

Members Debate

- i. The Chairman affirmed the PPM's prior comments that Nutrient Neutrality had not been reflected in the current iteration of the Local Plan and enquired if this would be a problem with respect of legal soundness. Further, had this been an issue for other Local Authorities?

The PPTL stated that Nutrient Neutrality advice presented a Legal Issue, and affirmed that whilst Natural England's advice was published after the consultation period had concluded, it remains a legal issue in relation to the Habitat Regulations Assessment (HRA) which did not address the matter. He advised that Nutrient Neutrality advice would need to be referenced in the Local Plan, with a revised HRA referencing appropriate mitigation solutions

which would pass the higher bar of 'beyond scientific doubt'. He advised that the Greater Norwich Local Plan had been suspended whilst Nutrient Neutrality was in abeyance, and that all other Norfolk Authorities had been affected.

- ii. The Chairman reflected on the numbers of second homes within the district, and referenced recent news articles stating that North Norfolk had the 2nd highest amount of second homes outside of London in England and Wales. He asked if there was potential for a second home strategy to be included in the Local Plan.

The PPTL advised if Members were minded to introduce policies which would seek to address homes in relation to locally identified need this would require additional work of the team, and would result in a significant delay to the Local Plan publication. The PPM endorsed the comments made by the PPTL and acknowledged representations had been received in response to the lack of second homes restrictions in the Local Plan. There remains the option for the Council to consider its position, however it would need to consider:

1. Evidence – Specifically what is the Council seeking to control and why?
2. Effectiveness of land-use mechanisms – The PPM stated his view that Land-use tools were not an effective way of controlling second home ownership for reasons detailed in prior meetings.

- iii. Cllr N Dixon enquired the impact Nutrient Neutrality had on the submission date of the Local Plan.

The PPTL advised that prior to Natural England's advice on Nutrient Neutrality the Planning Policy team had been working on an indicative timeline with the earliest submission date being the end of Summer 2022. However this was now brought into question.

The PPM stated NNDC were working with other Norfolk Authorities, and that lessons could be learned from the response supplied by the Inspector on the Greater Norwich Local Plan (GNLP), with the mitigation measures introduced with the GNLP could be adopted and replicated in North Norfolk. The PPM heeded Members that the timeline for mitigation strategies was uncertain, and referenced the timeline issues with the Green Infrastructure Strategy which was both cross-authority and ongoing. He cautioned that working collectively with other political authorities would lead to inevitable delays due to a difference of priority, and advised that interim solutions contained to North Norfolk only may be required.

Cllr N Dixon followed up on his question, and asked if the September deadline remained the target, or if this had been pushed back.

The PPM stated that he did not know what the position would be by September, and that the Councils position would be made clearer when the independent cross-authority specialist had been appointed and short term mitigation strategy's drafted. The test during the examination of the Local Plan by the Planning Inspector would be 'are you confident that mitigation strategy will be implementable within a reasonable period of time'. As the Local Plan was expected to last 20 years, a reasonable period for

implementing mitigation may be considered around 1-2 years. The PPM advised that the difficulty in delivering mitigation was in engaging with developers and private land owners, and it had been easier for those Local Authorities to implement mitigation where the land was owner was within the Public Sector.

- iv. Cllr N Pearce commended Officers for their work, and asked what guidance and support was available to Officers by the Government with respect of Nutrient Neutrality.

The PPM relayed that the government had appointed 2 advisors to address Nutrient Neutrality and that this was a bespoke resource available to all Local Authorities. Additionally the planning advisory group were hosting seminars and training with representatives from government in attendance to answer questions. He commented that, to some extent, the local branch of Natural England were caught off guard by the national announcement made and that had not received prior notification. He expressed his keenness that a collective response be utilised across the Norfolk Authorities, and advised that all Chief Officers were meeting on a weekly basis on this issue.

The PPTL reiterated Natural England's advice that solutions must be located upstream of the associated waste water recycling centre and that strategic solutions would need to be determined with respect of their individual locations.

The PPM advised that Nutrient Neutrality was established to maintain the current condition of the watercourses, this was not a case for betterment or improvement. He commented that the current condition of the watercourses was unacceptable, and advised it was likely that future policies introduced would seek to improve water quality. He elaborated that the government were looking into setting a challenging nature recovery strategy which would have a 40% reduction in nitrates in watercourses.

- v. Cllr P Grove-Jones affirmed that the discharge of nitrates and phosphates into the watercourse had been a longstanding issue, observed and studied 30 years ago. She expressed her support that action be taken to improve water quality, and that Anglian Water and Developers establish sensible solutions.
- vi. The Chairman commented that Natural England had assessed that only 12% of rivers and SSSI streams were considered to be of an acceptable quality, and stated his support that action be taken.

58 EXCLUSION OF PRESS AND PUBLIC

None.

59 TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA

None.

60 ANY OTHER URGENT EXEMPT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE

None.

The meeting ended at 12.57 pm.

Chairman