Tibbalds

6011 South Norfolk and Broadland Design Code

Stage 3 Engagement Summary (Summer 2025)

This note has been prepared to summarise the responses received during Stage 3 engagement for the South Norfolk and Broadland Design Code. Most of this note summarises comments received from the Placechangers website. This includes common themes and points that were raised several times (which are highlighted in brackets). Where helpful, some comments have been recorded verbatim. The final section records responses from statutory consultees and stakeholders.

1 Placechangers website

- Open for six weeks between 08/05/25 – 23/06/25

- 37 respondents and 61 responses

Question 1: Do you think these principles reflect the key design issues that need to be addressed across the districts?

- Generally, strong support under this section, with some suggestions below for strengthening.

- Incorporate Contemporary Design Solutions (3 responses): A few respondents highlighted the need to include support for contemporary architectural approaches alongside traditional designs, stressing the importance of modern aesthetics in the guidelines.

- Address Transport and Social Infrastructure (1 response): One response emphasised the lack of focus on transport integration and social infrastructure, suggesting that these elements are crucial for enhancing liveability and should be better addressed.

- Define Metrics for Implementation (1 response): A suggestion was made for establishing clear metrics and compliance standards to ensure that design principles are not only aspirational but also measurable and enforceable in practice.

- Lack of Attention to Density and Urban Form (1 response): Criticism was directed at insufficient discussion regarding managing urban density and the structuring of blocks, which are essential for achieving quality urban environments.

- Exclusion of Inclusive Design (1 response): Concerns were raised about the absence of principles focused on equity and inclusion, particularly in terms of accessibility and accommodating diverse user needs.

- Insufficient Detail on Implementation Viability (1 response): Some respondents noted a lack of guidance on practical aspects of implementation, such as viability, phasing, and long-term stewardship.

Question 2: Are there any principles or topics that you think could be strengthened?

- Water Conservation and Recycling (mentioned in 1 response). Emphasising water conservation techniques and recycling practices in planning to enhance sustainability.

- Focus on Utility and Parking Considerations (mentioned in 1 response). Strengthening considerations for dwelling design, street layout, and practical utility servicing, including provisions for electric vehicle charging.

- Support for Self-Build Initiatives (mentioned in 1 response). Recommend that developers dedicate 10% of plots for serviced self-build opportunities to make homebuilding more accessible for individuals with modest budgets.

- Support for red-list cavity-nesting birds (1 response). More background information or references about integral nest boxes (more commonly known as swift bricks), see NPPG Natural Environment 2025 paragraph 017

- Insufficient Biodiversity and Green Infrastructure References (mentioned in 2 responses). Criticism towards a lack of integration in planning for biodiversity, including limited references to the Green and Blue Infrastructure Strategy.

- Concerns Over Long-term Maintenance of Developments (mentioned in 1 response). Highlighting worries that management of shared spaces in new developments may shift from public bodies to private companies, affecting community engagement.

- Integration of Developments for Accessibility (mentioned in 1 response). Addressing the need for better connectivity between different housing developments to facilitate safe walking and cycling. Generally, how can we reduce reliance on private cars.

- How Will Developers Address Climate Adaptation Measures? (mentioned in 1 response). Seeking clarity on how planned developments will be designed to adapt to climate change, including energy efficiency and passive design solutions.

Question 3: Do you think the layout and design of the document is clear and easy to use?

- Strong agreement that the layout and design works well.

- Expansion on Key Areas: (1 mention). A response highlighted that while the document aligns well with planning policies, sections on nature, public transport, and long-term stewardship need greater clarity to enhance understanding.

- Refine Repetitive Content: (1 mention). One respondent noted that the structure is readable and categorised effectively, but suggested that some repetitive sections could be refined for better flow and engagement.

- Image-Text Combination: (1 mention). A participant praised the combination of succinct statements and images, stating this format enhances usability and makes the content easier to follow.

Question 4: Do you have any general comments on the design code?

- Enhance Implementation Mechanisms: Seven respondents emphasised the need for clearer details on how design principles will be enforced, including planning policies and design reviews, to ensure they translate into actual development outcomes. Establishing this connection between aspiration and delivery is essential if the principles are to have meaningful impact on the quality of future places.

- Incorporate Nature Positive Design: Five responses encouraged adding elements of 'nature positive growth' to the document, highlighting the importance of carbon efficiency, renewable energy, and water efficiency in the design priorities.

- Diverse Architectural Styles: Three respondents stressed the importance of maintaining a variety of housing styles to avoid uniformity, arguing that a range of designs contributes to the character and appeal of communities.

- Quote: "The danger of design codes is that the end result is that all new housing looks the same - part of the appeal of houses in this country is there is a variety of housing styles spanning many centuries. Far too many developers get away with producing mock Georgian and mock Victorian houses which all look the same wherever you go - these designs may not startle the horses but they are often poor, ill considered and without merit. Not enough planting and open space between and around new houses is provided - developers are still squeezing as many homes as they can to maximise their profits."

- Urban Focus: One response noted that the design code seemed primarily suited for urban areas, suggesting it may not be appropriate for rural settings.

- Lack of Detail: Two participants highlighted that the document lacks specifics on implementation and enforcement, raising concerns about its practical impact on future developments.

- Overemphasis on Profit Maximisation: One respondent criticised developers for prioritising profit, leading to insufficient open spaces and planting in new housing projects.

- We recommend adding reference to the emerging Local Nature Recovery Strategy within the 'Green, safe and social open spaces and streets that promote recreation and biodiversity' priority.

Question 5: Do you have any comments on the assessment framework?

- Most respondents did not have comments on the framework.

- Clarification of Terminology: A participant expressed uncertainty about the assessment framework and sought clearer definitions of the terms used. This indicates a need for better communication to engage public understanding. (1 response)

- No Major Changes Needed: A response recognised that the framework appears to align well with the design code, suggesting satisfaction with the current approach. (1 response)

- Disconnection from Community Needs: One critic noted that many proposals seem detached from the realities of existing communities, implying that they may not adequately address local needs. (1 response)

Question 6: Do you have any comments on the character assessment?

Respondents did not generally have comments on the character assessment.

- Clarification of Key Characteristics (1 response): It was suggested that the Character Assessment should specify that important views mentioned are from the Public Rights of Way network, not directly from the settlement, ensuring clarity and accuracy in the document. A recommendation was made to amend the document to focus on the setting of the Church of St Michael rather than views from it, to better represent the landscape's visual context. A proposal to revise Key Design Principle N11 was put forward, advocating for a focus on retaining existing views identified from the Public Rights of Way and encouraging the creation of new views.

- Comprehensiveness of the Document (2 responses): Two respondents felt that the Character Assessment was thorough and did not require further comment.

General comments across the neighbourhood scale chapter

- Support for the principles and codes, with some suggestions for strengthening, particularly around integrating nature and biodiversity, and suggesting more 'must' requirements over 'should'.

- Integration with Neighbourhood Plans (3 responses). Many respondents stressed the importance of incorporating local Neighbourhood Plans into the design principles. Local residents have invested time in creating these plans, which should serve as a foundation for any new developments to ensure alignment with community concerns and aspirations.

- Enhancing Biodiversity Measures (5 responses). Several participants recommended increasing biodiversity efforts, notably by insisting on a minimum of 20% Biodiversity Net Gain. They highlighted the need for explicit provisions for swift nesting sites (swift bricks) and connectivity for wildlife in residential designs to support local ecology (such as hedgehogs). References to external/existing strategies should be made, including Greater Norwich Green Infrastructure Strategy, and Natural England guidance.

- Multi-functional Public Spaces (3 responses). It was suggested that public open spaces must be designed to serve multiple functions, catering to both human recreation and wildlife needs. Clarification on how these spaces will be effectively maintained and their design tailored to community needs was encouraged.

- Nature and biodiversity - In terms of responding to existing local context it would be good to mention the effect of overall lighting levels and the need to mitigate its impacts in N7, particularly where new development in sited in greenfield areas in rural locations where the skies were dark before development occurred.

- Vehicle Dominance in Planning (4 responses). Numerous objections highlighted concerns about prioritising urban planning for cars over active travel. Without a stronger focus on pedestrian needs, the balance favours vehicles, undermining community integration and environmental goals.

- Lack of Clarity in Existing Provisions (3 responses). Participants indicated areas where the proposals could be more concise, particularly noting overlaps in language and the necessity for clearer guidelines around design elements. This would help streamline understanding and implementation of the design code.

- Housing Design Consistency (2 responses). Critiques were raised about the risk of designs becoming standardised, adversely impacting the architectural diversity when imposing specific housing typologies, which could dilute local character and uniqueness. The balance between preservation and innovation is not addressed—e.g., how new forms or modern aesthetics might still respect character.

- The inclusion of design priorities that promote healthy, inclusive, and connected neighbourhoods is welcomed. However, the Code could be strengthened by more explicitly addressing health inequalities, especially in the context of Norfolk's ageing population. Whilst principles that support healthy aging are embedded throughout the Design Code, the importance of this could be more explicitly emphasised in the Code's narrative. Similarly, mental wellbeing and social isolation could also be given more emphasis; the value of green and social spaces (both featured strongly throughout the Code) in supporting mental health is well recognised and could be reflected more clearly in the Code's narrative

General comments across the street scale chapter

- Enhancing Planting and Drainage Strategies. Multiple respondents, including Responses 1 and 12, advocated for clearer guidelines on planting and Sustainable Drainage Systems (SuDS), emphasising the ecological benefits of tree-lined streets and urban cooling. (5 mentions)

- Improving Pedestrian and Cycling Infrastructure. Respondents highlighted the necessity for safe, dedicated access for cyclists and pedestrians, alongside suggestions for incorporating features like proper lighting and seating to enhance walkability and social interaction. (5 mentions)

- Consideration of Electric Vehicle Infrastructure. There were calls for incorporating electric vehicle (EV) charging facilities in the design phase, ensuring accessibility for both residents and visitors, as noted in Responses 8 and 14. (4 mentions)

- Overdevelopment Concerns. Several responses, notably Response 9, expressed frustration over excessive development leading to inadequate infrastructure, loss of green spaces, and a disregard for community needs. (4 mentions)

- Lack of Practical Design Considerations. Critiques were raised about insufficient detail on waste management, building design consistency with existing properties, and the risk of creating undesirable living environments, as seen in Response 11. (3 mentions)

- Neglect of Climate Adaptation Strategies. A lack of emphasis on urban cooling solutions and the mitigation of outdoor air quality issues was noted, particularly in how street designs handle vehicle emissions. (3 mentions)

- More detail could be included on design features that promote walkability and sociability—e.g., seating, lighting, and frontages.

- Quote: "Too often new houses are very close to the boundary with no front garden, pavements are narrow and insufficient parking has been allowed for - this results in cars parked half on and half off the pavement with is both visually detrimental and a hazard for pushchairs and wheelchairs".

- Integrating cars - also need to have capacity for delivery vehicles. This is particularly true during the development phase - either the design or the project plan needs to allow for development which does disrupt or endanger the public.

- Quote: The Code could go further in addressing outdoor air quality, particularly by highlighting the role of street design in reducing exposure to vehicle emissions, i.e. through thoughtful layout, planting, and minimising car dominance near sensitive receptors such as schools and community facilities.

General comments across the home scale chapter

- Solar and Energy Efficiency Integration (6 mentions): Many respondents emphasised the necessity for solar panels, ASHPs, and EV charging points in all new homes, reflecting a strong push for sustainable energy solutions.

- Biodiversity Enhancements (4 mentions): Suggestions included integrating swift bricks and habitat-friendly designs to support local wildlife, asserting the importance of ecological considerations in new developments.

- Clarification of Design Terminology (3 mentions): Feedback highlighted the need for clearer definitions regarding architectural standards and materials, ensuring all interpretations align with community expectations and encourage quality design.

- Confusion Over Planning vs. Building Regulations (5 mentions): Several responses expressed concerns that technical building standards are being conflated with planning policies, which could lead to implementation challenges.

- Insufficient Climate Resilience Details (3 mentions): Some responses addressed the need for more stringent climate resilience measures, advocating for clearer mandates rather than general recommendations.

2   Comments from stakeholders and statutory consultees

Waste Team

- They would like to include a diagram for refuse arrangements

- Would also like to make reference to the adopted guidance on waste and street cleansing

Highways team

- Various specific comments to clarify codes. Suggestions were made to ensure the codes align with existing highways guidance and best practice. Key changes were around references to traffic calming measures, reference to delivery and servicing, the location and wording of codes for visitor car parking, and removing reference to 'relaxing' car parking standards in accessible locations.

- Quote: "Can the Design Code be expanded to advise communal bin collections points should be clear of roads and footways (private or adopted) to prevent any conflict / interference on collection days?"

- Quote: "Page 15, states that the scale of development expected in the main towns and key services centres would be up to 50 units. However, most of the identified settlements have developments / allocations significantly in excess of 50 dwellings. Should this figure be more like 250 dwellings? Whilst visitor parking would normally be in the street corridor, spaces allocated to individual dwellings would not be".

- Quote: "Streets should be designed for low traffic speeds, traffic volume is a function of the size of the development and should be removed from this policy. S4.2 – all new developments (with the exception of some spine roads on larger developments) are subject to a 20mph zone and should be designed with an appropriate layout to naturally constrain vehicle speed and avoid the need for additional traffic calming features. For example a bend provides an appropriate traffic calming measure and avoids the need for raised tables, etc"

- Quote: "As discussed, stating that parking standards should be relaxed on all sites is too simplistic and not acceptable. Whilst it might be considered acceptable to consider a reduction in parking provision in some locations in the Norwich Fringe or town centres, for the majority of development we will still require parking to be provided in full, in accordance with NCC standards".

Historic England

- Historic England - could include 'all references to heritage assets mean both designated and non-designated'. Rather than repeating

NCC Public Health Team

- "I've just responded to the consultation on SN and Broadland's draft Design Code via the Placechangers website; overall it's a great piece of work and I'm pleased to see health and wellbeing factors embedded throughout. Just a minor point: I think the labelling of the ventilation diagram on p64 has cross-ventilation and cross- and stack ventilation mixed up. I just wanted to point out in case this had been missed, apologies for being pedantic."

Designing out crime team

- Clarify approach around cul-de-sacs. Suggest 'avoiding long cul-de-sacs'.

- Defensive buffer zone - add in line about increased depth of buffer zone where adjacent to POS or public realm (and screened by planting).

- Public open spaces should be overlooked by buildings, and fronted on to. Add this into open space section. Add in as new principle under section 3.3. N15

- Last point on 'active' window - overlaps with highways comment. Add in reference to overlooking parking

Broads Authority

- Include opening line to say that the Broads Authority is not considered in this document

- Dark skies - capture in context section

- Define what net zero carbon means - doesn't; include transport, check this

- In H16 wording change to principle 'must' tackle surface water.

LLFA

- Suggest a few locations where wording can be strengthened, and references to SuDS and requirement for nature-based SuDS strengthened throughout the document.

Anglian Water

- Planting should also take account of the right plants/trees for the right space, and ensure that planting will not interfere with any underground services such as sewers and water mains. Root ingress can result in groundwater and surface water infiltration to our sewer network that can lead to hydraulic overloading and potential sewer flooding.

- This is why we require developers to site any existing assets in the public highway or open space and not in private gardens or under buildings. In general our assets should be within the public realm.

- Anglian Water agrees that roofs should be multi-functional and not only contribute to energy generation and biodiversity net gain, but also improved water efficiency by minimising demands for potable water - this should be consistent with code H16.

- H11.3 New development must incorporate rainwater collection from roofs, for example via water butts. Anglian Water would hope the Design Code would incentivise the reuse of rainwater for internal use such as flushing toilets, rather than only referring to the installation of a water butt, which might help save water, however, during the winter it will most likely remain full, whilst a reuse scheme for flushing toilets can help minimise potable water use and be in use all year round, particularly if installed at a community scale for larger developments.

- However, for H16.1 we repeat our response to H11.3 (5.6 Building elevations and roofs) to reuse water for purposes such as flushing toilets

Officers

- A 2-week testing period was undertaken with DM officers, where live projects were assessed against the code. This highlighted several areas that needed strengthening, where wording could be tightened, and in some case must should approach amended. For example:

  - Include reference to SuDS in design priorities

  - Norfolk exceptionally dry - add something in about water conservation/ water resource management

  - on street car parking should be in form of laybys rather than just on street

  - Say a bit more about ensuring there is access to self build plots throughout construction process and not putting them all into worst part of site and requiring plot passports to be approved for them

  - More images as quick visual guide – can be too prescriptive – don't want developers just to copy images or diagrams

  - More local examples could replace some of the Cambridge examples.

  - Fences unsuccessful. Management needs to be in one company. E.g. properties become outward facing becomes a public domain – single management company.

Councillors

- Including commentary around "Safest and most direct route towards schools and important amenities"

- Inclusive design comments, focussed on strengthening H9.1 and H9.2, and also requirements around accessible and inclusive play spaces (strengthening code N14.3)