

**Broads Local Plan
October Bite Size Pieces**
Report by Planning Policy Officer

Summary: This report introduces the following topics of the Preferred Options Local Plan: Links between the Broads Plan and Local Plan, Duty to Cooperate Statement, Sequential Test, Permission in Principle section, how issues included in the Issue and Options have been addressed, what has happened to the currently adopted policies, the proposed approach to consultation and Neighbourhood Plan v Local Plan.

Recommendation: Members' views are requested.

1 Introduction

- 1.1 This bite-size piece of the Preferred Options discusses Links between the Broads Plan and Local Plan, Duty to Cooperate Statement, Sequential Test, Permission in Principle section, how issues included in the Issue and Options have been addressed, what has happened to the currently adopted policies, approach to consultation.
- 1.2 Members' views are requested to inform the draft policy approach in the Preferred Options.
- 1.3 It is important to note that this is not necessarily the final text or approach, but is part of the development of the final text. There could be other considerations that come to light between now and the final version being presented to Planning Committee in November 2016.

2 The policies

Appendix A: Links between the Broads Plan and Local Plan

- 2.1 It is important that the Local Plan is in conformity with the emerging Broads Plan. This may form an appendix in the Local Plan.

Appendix B: Duty to Cooperate Statement

- 2.2 It is important to set out our approach to Duty to Cooperate so stakeholders and the public can see what we have been doing. This will be separate to the Local Plan and updated as the Local Plan progresses.

Appendix C: Sequential Test

- 2.3 Flood risk is an important issue in the Broads and this table sets out how the Sequential Test has been applied to all the land allocation policies in the Local Plan.

Appendix D: Permission in Principle section

- 2.4 Permission in Principle is a requirement from the Housing and Planning Act 2016. The Regulations on how this will operate are awaited, so this section discusses Permission in Principle rather than applies it at this stage.

Appendix E: How issues included in the Issue and Options have been addressed

- 2.5 This simple document explains what has happened to the various issues raised in the Issues and Options version of the Local Plan.

Appendix F: What has happened to the currently adopted policies

- 2.6 This sets out what has happened to the policies that are currently in place.

Appendix G: Approach to consultation

- 2.7 This sets out how it is proposed to undertake the consultation on the Preferred Options version of the Local Plan.

Appendix H: Neighbourhood Plan v Local Plan

- 2.8 This section seeks to assess the adopted neighbourhood plans against the proposed Local Plan to meet the NPPF requirements.

3.0 Financial Implications

- 3.1 Generally officer time in producing these policies and any associated guidance as well as in using the policies to determining planning applications. There is a budget for up to £1,000 for the consultation.

Background papers: None
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Date of report: 29 September 2016

Appendices: Appendix A: Links between the Broads Plan and Local Plan
Appendix B: Duty to Cooperate Statement
Appendix C: Sequential Test
Appendix D: Permission in Principle section
Appendix E: How issues included in the Issue and Options have been addressed
Appendix F: What has happened to the currently adopted policies
Appendix G: Approach to consultation
Appendix H: Neighbourhood Plan v Local Plan

Appendix A: How the Local Plan is in conformity with the Broads Plan

The Broads Plan is the key management plan for the Broads. It sets out a long-term vision for the area and guiding partnership actions to benefit the Broads environment, communities and visitors. The Broads Plan is reviewed and updated on a regular basis. Broads Plan 2017 will update the 2011-16 Plan, and set out our strategic priorities for the period 2017-22.

This document sets out how the Local Plan for the Broads is in conformity with the Broads Plan.

1. Vision

The Local Plan uses the same vision as the Broads Plan. See page x of the Local Plan.

2. Fundamental principles

The Broads Plan has the following fundamental principles and the Local Plan addresses these in the following ways.

Fundamental Principle in Broads Plan	How the Local Plan addresses this principle.
Take a precautionary approach: Where there are likely threats of serious or irreversible damage to the environment, as a precaution, cost-effective measures will be taken to prevent environmental degradation in the absence of full scientific certainty of the outcome of such threats.	In general the policies of the Local Plan seek to protect and where appropriate enhance the various assets of the Broads. So taken as a whole, the policies in the Local Plan generally meet the thrust of this principle.
Manage sustainably: Understand and respect the complexity and biological limits of our ecosystems, and conserve their structures to maintain their health and productivity. Manage at the local scale while recognizing the direct or indirect effects on the wider, interconnected ecosystems and the services they provide. Manage for long-term, multiple benefits, not just for short-term or single interest gains.	
Engage, learn and act together: Plan and work in partnership to make the best use of shared knowledge and resources, and to avoid duplication of effort. Involve people from an early stage in making decisions that may interest or affect them. Support decisions with robust evidence, including scientific and local knowledge, innovation and best practice.	The process of producing the Local Plan has involved the community from the start. The policy approaches have evidence to justify them.

3. Priority partnership actions

Themes	Headline aspirations of the Broads Plan	How the Local Plan addresses this theme.
A. Managing water resources	Aspiration 1: Improve water capture and efficient water use	The Local Plan has policies relating to water

and flood risk	across the Broads catchment, and develop a longer-term integrated flood risk management strategy for the Broads and coast	efficiency and flood risk.
B. Sustaining landscapes for biodiversity and agriculture	Aspiration 2: Protect, conserve and enhance water quality and land and habitat condition to benefit priority species, recognising natural environmental change and retaining a thriving and sustainable agricultural industry	The Local Plan has policies relating to water quality, peat and biodiversity.
C. Maintaining and enhancing the navigation	Aspiration 3: Apply a catchment-scale approach to reduce sediment input and the sediment backlog, and sustainably reuse or dispose of dredged material Aspiration 4: Maintain a safe, open navigation and reduce pressures on busy or vulnerable areas	The Local Plan has policies relating to moorings, bank protection, disposal of excavated material, not impacting navigation and ensures that wind shadow is considered.
D. Conserving landscape character and the historic environment	Aspiration 5: Improve understanding, protection, conservation and enhancement of the Broads landscape character and distinctive built, cultural, archaeological and geological assets	The Local Plan has policies relating to landscape, landscaping, settlement fringe, archaeology, the historic environment and design.
E. Building climate-smart communities	Aspiration 6: Build the awareness and adaptive capacity of local communities to the challenges of climate change and sea level rise	The Local Plan has policies relating to renewable energy, climate change and flood risk.
F. Offering distinctive recreational experiences	Aspiration 7: Provide opportunities for distinctive recreational experiences in harmony with the special qualities of the area	The Local Plan has policies relating to tourism, tranquillity and light pollution. In general the policies seek to protect and where appropriate enhance the special qualities of the area.
G. Raising awareness and understanding	Aspiration 8: Strengthen and promote key messages and the tourism offer in keeping with the area's status, special qualities, history and traditions	
H. Supporting, connecting and inspiring people	Aspiration 9: Facilitate development within and adjacent to the Broads, while minimising adverse impacts on the Broads' special qualities Aspiration 10: Strengthen connections between a wide	The Local Plan policies in general seek to protect and where appropriate enhance the special qualities of the Broads. The community has been

	audience, particularly local communities and young people, and the Broads environment	involved in shaping the Local Plan. Young People have also been involved in giving the Authority their thoughts.
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Duty to Cooperate Statement.

Statement of Cooperation on Strategic Planning Matters

In support of the Proposed Broads Local Plan¹

September 2016

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¹ Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), and Part 2 of the Town and Country Planning (Local Development) (England) Regulations 2012

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1 Introduction

1.1 About this Duty to Cooperate Statement

The Localism Act 2011 imposes upon local planning authorities and others a ‘duty to cooperate’ on strategic planning matters (i.e. those that affect more than one planning authority area). The Duty requires that a Local Planning Authority engages constructively, actively and on an on-going basis with relevant or prescribed bodies in order to maximise the effectiveness of development plan preparation and strategic matters.

This statement summarises how the Broads Authority has met that requirement in terms of the activity of cooperation and the effectiveness of that cooperation insofar as it relates to the Proposed Broads Local Plan. This statement sets out how the Broads Authority has cooperated with the Prescribed Bodies as required by The Town and Country Planning (Local Planning) (England) Regulations 2012 (PART 2) Duty to co-operate as well as other National Parks and Neighbouring District Councils. The prescribed bodies are:

- the Environment Agency;
- the Historic Buildings and Monuments Commission for England (known as English Heritage);
- Natural England;
- the Mayor of London;
- the Civil Aviation Authority;
- the Homes and Communities Agency;
- each Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section;
- the Office of Rail Regulation;
- Transport for London;
- each Integrated Transport Authority;
- each highway authority within the meaning of section 1 of the Highways Act 1980(20)(including the Secretary of State, where the Secretary of State is the highways authority)

The Statement of Consultation that accompanies the Local Plan should also be referred to. This sets out the stages of consultation, who was consulted, what was said and the Broads Authority’s response to the representations and how the comments were taken on board.

Section 2 onwards discusses cooperation with the prescribed bodies.

1.2 Administrative Geography

The Broads is a national park equivalent protected landscape. The Broads Authority is a special statutory authority and the sole local planning authority for the Broads Authority Executive Area.

This designated area falls within the administrative area of six district level councils (Broadland, South Norfolk, North Norfolk, Waveney, Great Yarmouth Borough and Norwich City), and two

county councils (Norfolk and Suffolk) (see [Appendix A](#)). The 'district' councils are local planning authorities only for that part of their respective administrative areas outside the Broads, but housing authorities, etc. for the whole of their district, including that within the Broads. Norfolk and Suffolk County Councils are the county and minerals and waste planning authorities for the whole of their respective counties, including the Broads.

A coastal part of the Broads is also within the Norfolk Coast Area of Outstanding Natural Beauty. The AONB does not have a separate statutory authority, unlike national parks and the Broads, but is managed by the constituent local authorities and Natural England through the Norfolk Coast partnership.

There are 91 civil parishes (and two unparished areas) in the Broads designated area. In every case the parish includes land both within and without the Broads boundary (i.e. in two local planning authorities' areas).

1.3 History of Cooperation.

Importantly the 1988 Broads Act Section 17a makes it a general duty of all public bodies in exercising their functions to have regard to all 3 of the Broads Authority's purposes. This duty means the Broads Authority has long established relationships with government departments and agencies and a range of other local and public bodies in delivering national park purposes.

2 Neighbouring Local Planning Authorities

2.1 The Broads and its surroundings generally

Particular considerations apply in the Norwich area, because of the large scale of growth planned there. The particularities of these are dealt with in separate sections below.

At the eastern end of the Broads, the towns of Great Yarmouth and Lowestoft also have growth planned, but of a much smaller scale. Elsewhere around the fringes of the Broads area is generally largely rural, and there is more incremental change planned, including in the towns and other developed areas such as Beccles, Bungay, Hoveton and Stalham. The cross boundary issues generally tend to be very localised and specific.

The boundary of the Broads was determined in the light of its landscape, navigation and recreational value. The boundary largely follows the extent of the flood plain. Hence, typically the boundary will include the river frontage parts of settlements of which the greater part lies outside the boundary and in the district or borough council's planning area. In such cases, even if the settlement is identified by the council for some growth, this is usually best accommodated in that council's planning area, as the land within the Broads is usually constrained by the importance of conserving its nationally important landscape, navigation considerations, and at a high risk of flooding.

Because the boundary runs through the heart of settlements, it is the case that sites, ownerships and functions may straddle the boundary, and there is sometimes a need to coordinate on not just wider, 'strategic' matters, but also more site specific matters to ensure that development either side of the boundary is complementary.

2.2 Cooperation mechanisms

- i) **Direct links at member level:** Each district and county council appoints one of its Councillors to Membership of the Broads Authority. Each of the 6 Districts and 2 County Councils have representation at the Planning Committee by virtue of one of their Broads Authority appointed Members. The Planning Committee's role relates to Development Management, Enforcement and Local Plan issues. Each consultation stage of the production of the Local Plan was agreed by Planning Committee as well as Full Authority. The Planning Committee remit also includes responses on consultations, demonstrating co-operation works both ways. The current membership of Planning Committee is as follows:

- Mike Barnard, Waveney District Council
- Gail Harris, Norwich City Council
- Paul Rice, North Norfolk Council
- Haydn Thirtle, Great Yarmouth Borough Council
- Victor Thomson, South Norfolk District Council
- John Timewell, Norfolk County Council
- Jacquie Burgess, Secretary of State Appointee
- Bill Dickson, Secretary of State Appointee
- Peter Dixon, Secretary of State Appointee

Currently there is no representative from Broadland District Council or Suffolk County Council.

- ii) **Norfolk Strategic Framework:** The purpose of the Norfolk Strategic Framework (NSF) is to produce a non-statutory framework with planning authorities across Norfolk about joint working to continue to ensure that the Duty to Cooperate is discharged and there is beneficial co-operation of strategic planning issues across a wide area. Four task and finish groups have been formed: Housing, Economy, Infrastructure and Delivery. These meet regularly and are charged with producing the necessary evidence to inform their part of the Framework. The final document is set for completion early 2017. The document will provide an overarching framework for strategic planning issues across the county, taking account of any key issues in neighbouring areas, and beyond with an emphasis on strategic land use issues with cross boundary implications. It relates to the period from 2012 to 2036 and is intended to support and inform the preparation of Local Plans produced by individual planning authorities.
- iii) **Suffolk Strategic Planning and Infrastructure Framework:** This is Suffolk's equivalent to the Norfolk Strategic Framework. The production of this document is on a similar timeline. The process is slightly different to reflect a wider remit and funding that is available.

- iv) **Joint Member Group Meeting – Norfolk.** This meets quarterly and cross boundary issues are discussed with the way forward recommended for each constituent LPA to then take forward.
- v) **Informal discussions and meetings** between planning policy officers on sites and issues with cross boundary implications, on occasions involving directors of planning and individual Council or Authority members. For example a quarterly meeting between Waveney District Council and Great Yarmouth Borough Council and the Broads Authority. Also a bi-annual meeting with Norfolk County Council.
- vi) **Ongoing engagement at officer level** (usually head of planning policy) through the Norwich Strategic Planning Group (meeting monthly). There is a Suffolk equivalent which meets on an ad hoc basis.
- vii) Joint working with relevant district councils regarding the **Neighbourhood Plans** that straddle both Local Planning Authority boundaries.
- viii) Involvement at member, officer, or both, in **local strategic partnerships** and the eight sustainable community strategies each covering part of the Broads.
- ix) **Specific discussions at officer level** on emerging cross boundary issues by telephone, email and meetings.
- x) **Other ongoing engagement at officer level including**
 - a. Norfolk Local Authorities Chief Executives (including police and fire service)
 - b. Norfolk Strategic Services Group (BA Chief Executive)
 - c. Norfolk Planning and Biodiversity Topic Group
 - d. Norfolk Conservation Officers Group
 - e. Suffolk Conservation Officers Forum
 - f. Norfolk Heads of Planning
 - g. Norfolk public services summit (including the police and Public Health)
 - h. Norfolk Strategic Services Coordinating Group
- xi) **Formal consultations** on development plan documents, supplementary planning documents, and planning applications with potential cross-boundary implications.
- xii) BA is a member, and sits on the management group, of the **Norfolk Coast AONB Partnership**.
- xiii) BA is a member of the **Norfolk Biodiversity Partnership** along with the relevant local authorities (Breckland, Broadland, Great Yarmouth, Kings Lynn and West Norfolk, North Norfolk, Norwich, South Norfolk), Natural England and the Environment Agencies, together with bodies not subject to the 'duty to cooperate', Anglian Water, British Trust for Ornithology, Royal Society for the Protection of Birds, Farming and Wildlife Advisory Group, Forestry Commission, Norfolk and Norwich Naturalists' Society, Norfolk Biodiversity Information Service, Norfolk Geodiversity

Partnership, and Norfolk Wildlife Trust, University of East Anglia and Water Management Alliance.

xiv) BA is a member of the ***Suffolk Biodiversity Partnership***, along with Suffolk County Council.

xv) ***Arrangements with Norfolk County Council*** for the provision of advice and services in relation to legal, property, historic environment and archaeology., legal and property advice.

Arrangements with Suffolk County Council for external bid funding and other support.

xvi) The Authority's remit differs from a Local Authority, BA is a Local Planning Authority but does not have ***statutory responsibilities*** in, for example; housing, economic development, environmental health, education, and highways, beyond its planning role. This means the Authority works closely with these local authority departments in both plan-making and decision-taking. This enables strong connection with other authorities at an officer level.

xvii) ***Joint evidence base production.*** Some evidence base to support Local Plan production has been commissioned jointly. See next section for detail. In general, where one of the Authority's constituent districts has commissioned evidence to support their Local Plan, it tends to cover the entire district, including that in the Broads Authority Executive Area.

2.3 Co-operation outcomes

A Memorandum of Understanding has been produced and signed to provide documentary evidence of the existing practice in relation to housing and employment planning in and around the Broads following revocation of the Regional Spatial Strategy.

Agreement or coordination on approach and issues relating to a range of sites either side of the Broads boundary. These relate to both cross-boundary planning issues and sites within the Broads where the Authority's role of local planning authority needs to be coordinated with the relevant council's other responsibilities. Examples include –

- Open space – assessed by the districts and the new Local Plan seeks to allocate these areas of open space.
- Norfolk and Suffolk County Council regarding safeguarded minerals sites.
- Application stage for Ditchingham Maltings in South Norfolk and Pegasus in Waveney regarding open space and affordable housing.
- Application stage for the Utilities Site (also known as Generation Park). The entire scheme is within the areas of the Broads Authority and Norwich City. Joint working related to joint determination of both applications as well as open space and affordable housing.
- Retail – working with Waveney and North Norfolk relating to a combined approach to joint areas of retail.

Joint Supplementary Planning Document with Waveney District Council on the Pegasus Site, Oulton Broad.

Cross-boundary conservation areas (and conservation area appraisals) with each of Broadland, Norwich, North Norfolk, South Norfolk and Waveney Councils.

Broads (and hinterland) Landscape Capacity Study Wind-Turbines, for Photo-Voltaics and Associated Infrastructure, with input/engagement of South Norfolk District and Great Yarmouth Borough.

With three Neighbourhood Plans adopted and more being produced, joint working is required to assist in their production as well as ensure the regulatory steps are met in good time.

Broads Biodiversity Action Plan; Norfolk Biodiversity Action Plan; Suffolk Biodiversity Action Plan 2012.

Officer level support in planning appeals where there are cross-boundary impacts, e.g. wind turbines in Hemsby (GYBC) and Beccles (Waveney DC).

Completed joint evidence base, for example the Central Norfolk SHMA covers Breckland, Broadland, South and North Norfolk and Norwich and hence the part of the Broads Authority Executive Area on those districts. The Broads Authority, Waveney and Great Yarmouth Councils produced a Settlement Fringe study. Gypsy and Traveller study and Water Cycle and Strategic Flood Risk Assessment are other studies that could be completed jointly. Norfolk Recreation Impact Study was completed for all of Norfolk.

Norfolk and Suffolk County Councils were part of the new Flood Risk Supplementary Planning Document project group.

3 Greater Norwich Joint Core Strategy

Norwich City, Broadland District, and South Norfolk District, working with Norfolk County Council, have combined as part of the Greater Norwich Growth Partnership (GNGP). They produced a Joint Core Strategy for their combined planning areas (i.e. excluding the Broads) which was adopted in 2011 and then 2014. The GNBP are now reviewing their policies as they look to produce a new Local Plan.

The Broads Authority is an active member of the GNGP with officers and members involved.

Although the western part of the Broads is within the general area of the Joint Core Strategy, BA decided at an early stage to produce its own Local Plan for the Broads area separately. This is because of the very different issues and considerations generally applying in the Broads.

This growth is planned to take place entirely outside the Broads and within the GNGP Joint Core Strategy area, but there are a range of cross boundary and complementary issues.

3.1 Cooperation mechanisms

The Broads Authority is an active member of the GNGP with Officers attending the working group meetings, Director attending the Director Board and Member attending the joint Member Group meetings.

Joint working on evidence base relating to the Strategic Housing Market Assessment and potentially the Gypsy and Traveller study.

Statutory consultations on the GNGP Joint Local Plan.

3.2 Co-operation Outcomes

Considered Joint Core Strategy with other GNGP member authorities, but concluded that the nature of the planning issues was fundamentally different in the Broads, and that the Broads Authority could get a Local Plan in place for its area sooner outside the Greater Norwich Local Plan. The GNGP Local Plan thus covers the wider Norwich area (including beyond the boundaries of the City Council) but excludes the Broads area.

The Broads is recognised by the GNDP for its national importance, and for its contribution to the economy, environment and quality of life of the sub-region. The identification of the potential for large scale growth in the wider Norwich area has been informed by the sensitivities and value of the Broads.

Joint policy statement on the development of the cross-boundary East Norwich Site (Utilities and Deal Ground Sites) with Norwich City and South Norfolk District Councils.

Attended the Issues workshops which will inform early versions of the Local Plan.

Further cooperation could see involvement in the production of the evidence base to inform the Local Plan.

4 Coast

The coast in the vicinity of the Broads is low lying, and historically has been breached on a number of occasions and eroded significantly. The anticipated effects of climate change and other factors suggest a likely increase in frequency and severity of such events and processes.

The Broads' ecological, economic, community and landscape values and qualities are highly vulnerable to the effects of any future breach of the coast, both in the vicinity of any breach and far inland. As well as the flooding likely to result, which could extend well inland, the incursion of salt seawater would very seriously affect internationally protected habitats and species, as well as the Broads ecology more generally.

The coast is also a key part of the Broads landscape, and well loved for its accessible but remote feeling beach and dunes, and distinct habitats and species associated with the sea face of the coast,

the brackish waters and soils on its landward side, and the intervening dunes. The combination of sensitive nature and visitor pressures (for instance, viewing of the seals and their pups on the beach in the winter is extremely popular) requires careful management.

4.1 Cooperation mechanisms

The Authority has been involved in the development of the adopted shoreline management plan (SMP) for the area, and the action planning to implement this and inform future plans.

The Authority sits on the 'SMP Client Steering Group' along with the relevant local authorities (who, unlike the Broads Authority, have formal powers and responsibilities for coastal defences and shoreline management planning) namely North Norfolk District, Great Yarmouth Borough and Waveney District Councils, together with the Environment Agency and the Norfolk Coast (AONB) Partnership.

The Authority has had long term involvement with Natural England and a range of other partners to develop, through discussion and research, understanding of the potential impacts of climate change, and possible adaption measures. (Note that these considerations are not confined to coastal matters, but are included here for convenience and because of their obvious particular relevance to the coast.) This cooperation currently takes the form of the Broads Climate Change Adaption Group, with a lead roles being played by BA, Natural England and the Environment Agency, together with the University of East Anglia, and involvement of local authorities, Norfolk Wildlife Trust, NFU, etc.

4.2 Co-operation outcomes

Shoreline Management Plan 6 (Kelling Hard to Lowestoft Ness). Provides for intervention to hold the current line of the coast of the Broads for the medium term, while investigating the long term sustainability of this option.

A widening appreciation of the political, technical and community challenges in facing coastal change and other potential climate change impacts.

Increasing recognition by the coastal defence community that changes in this particular part of the coast could have a wide range of major impacts on the Broads stretching far inland, and of a need to further investigate and understand the risks and opportunities, including those further inland than the coastal strip itself.

Increased understanding of potential climate change effects on the area and the identification of a range of trial potential adaption measures.

5 National Parks family

Strategic planning matters – those that affect more than one planning area - are not limited to those areas which are contiguous. The Broads is part of the UK family of national parks, and for all their

differences there are many issues which affect them jointly. They are largely rural areas with the highest status of protection and a national role in recreation and tourism, dependent on fragile ways of life and communities to maintain their distinctive landscapes, under great housing pressure for second homes and retirement, and highly vulnerable to erosion of their special qualities through incremental change. As such they need special treatment. National planning policies conceived primarily with urban and suburban areas of growth and regeneration in mind can be highly inappropriate. Special care and creativity is needed to ensure both that the national parks and the Broads are suitably conserved and developed, and to ensure that they make their full contribution to the quality of life and the economy of the areas around them and the nation more generally.

5.1 Cooperation mechanisms

The Broads Authority works closely, at both officer and member level, with the national park authorities, which are each the local planning authority for their national park area, to address emerging issues and share best practice. National Parks England (which includes the Broads Authority and all the English National Park Authorities), acts as the focus and conduit for much of this work, and especially the lobbying of Government to ensure that the interests of national parks and the Broads and their potential contribution to wider sustainability are better understood. Of particular relevance to the planning of the national parks and the Broads are the following standing officer working groups

- Chief Executives
- Heads of Planning Policy
- Heads of Development Management
- Conservation Officers
- landscape
- Ecologists
- recreation and tourism

The National Parks, through National Parks England, also submit joint representations in response to Government consultations on planning policy and have ongoing dialogue with DEFRA, DCLG, the Planning Inspectorate, etc. evidence to national commissions and enquiries (e.g. Rural Affordable Housing Commission).

5.2 Co-operation outcomes

Continuation of the special treatment of national parks and the Broads in the National planning policy framework.

Enhanced policies and approaches to issues such as affordable housing, accommodation of housing growth, climate change mitigation and adaptation, wind farms and other renewable generation, contribution of development to landscape, wildlife, cultural heritage and recreation, etc.

6 Environment Agency

Long standing close working arrangements (including joint projects) between the organisations on a range of issues, especially on planning policies for flood risk zones (a major issue in the Broads), flood defences, Shoreline Management Plan, water quality, navigation matters, recreation, etc. (The Broads Authority until recently shared offices with the Environment Agency, which facilitated close working.) Joint EA/BA funding of a Catchment Officer. Statutory consultations, including on preparation of the Local Plan. The EA are also involved in the Norfolk Strategic Planning Officers Group and the production of the Norfolk Strategic Framework. The EA were also part of the new Flood Risk Supplementary Planning Document working group.

7 Historic England

General consultation on planning documents. Liaison regarding the way forward with regards to the Broads and Archaeology.

8 Natural England

Long-standing close working arrangements (including joint projects) between the organisations on a range of issues around nature conservation including Biodiversity Action Plans, climate change, etc. (The Broads Authority until recently shared offices with Natural England, which facilitated close working.)

Joint NE/BA funding of an officer to work on non-native species issues.

Statutory consultations, including on the Local Plan.

9 Mayor of London

Whilst not directly relevant to the Broads area, work has been ongoing in relation to cooperating over the wider South East of England. Members have attended some meetings. In general, Norfolk County Council Officers and South Norfolk District Council Leader (in his role as chair of the Norfolk Strategic Framework) have represented Norfolk in meetings.

10 Civil Aviation Authority

No relevant strategic issues have arisen during the review period.

(The Authority has, in the past, commented on consultation documents from Norwich International Airport, and drawn their attention to the issue of tranquility in the Broads area as a matter for consideration in planning the airport's use of its controlled airspace.)

11 Office of Rail Regulation

No relevant strategic issues have arisen during the period.

(The Authority is a signatory to the East Anglia Rail Prospectus. It has also had extensive involvement with Network Rail in relation to issues around the maintenance, operation and

potential replacement of the aged swing and lifting rail bridges across the Broads' rivers (which affect navigation as well as rail services and passengers, and the accessibility of the area to visitors), at all levels from navigation rangers and rail bridge operators to BA Chief Executive and NR Directors).

12 Highways England

No relevant strategic issues have arisen during the review period.

13 Homes and Communities Agency

No relevant strategic issues have arisen during the review period.

14 Primary Care Trusts/ Clinical Commissioning Groups and National Health Service Commissioning Board

No relevant strategic issues have arisen during the review period. (The scale and pace of development in the Broads area is unlikely to affect healthcare planning.).

As set out in the Local Infrastructure Study, NHS England is not currently aware of a specific need for additional health facilities within the Broads Executive Area. There is currently sufficient capacity to cope with the existing populations in the area. Additionally there is not at present, due to capacity reasons, a need to expand the health facilities outside the Broads Executive Area into the Broads Executive Area.

15 Transport for London

Not relevant to the Broads area.

16 Integrated Transport Authorities

None relevant to the Broads area.

17 Marine Management Organisation

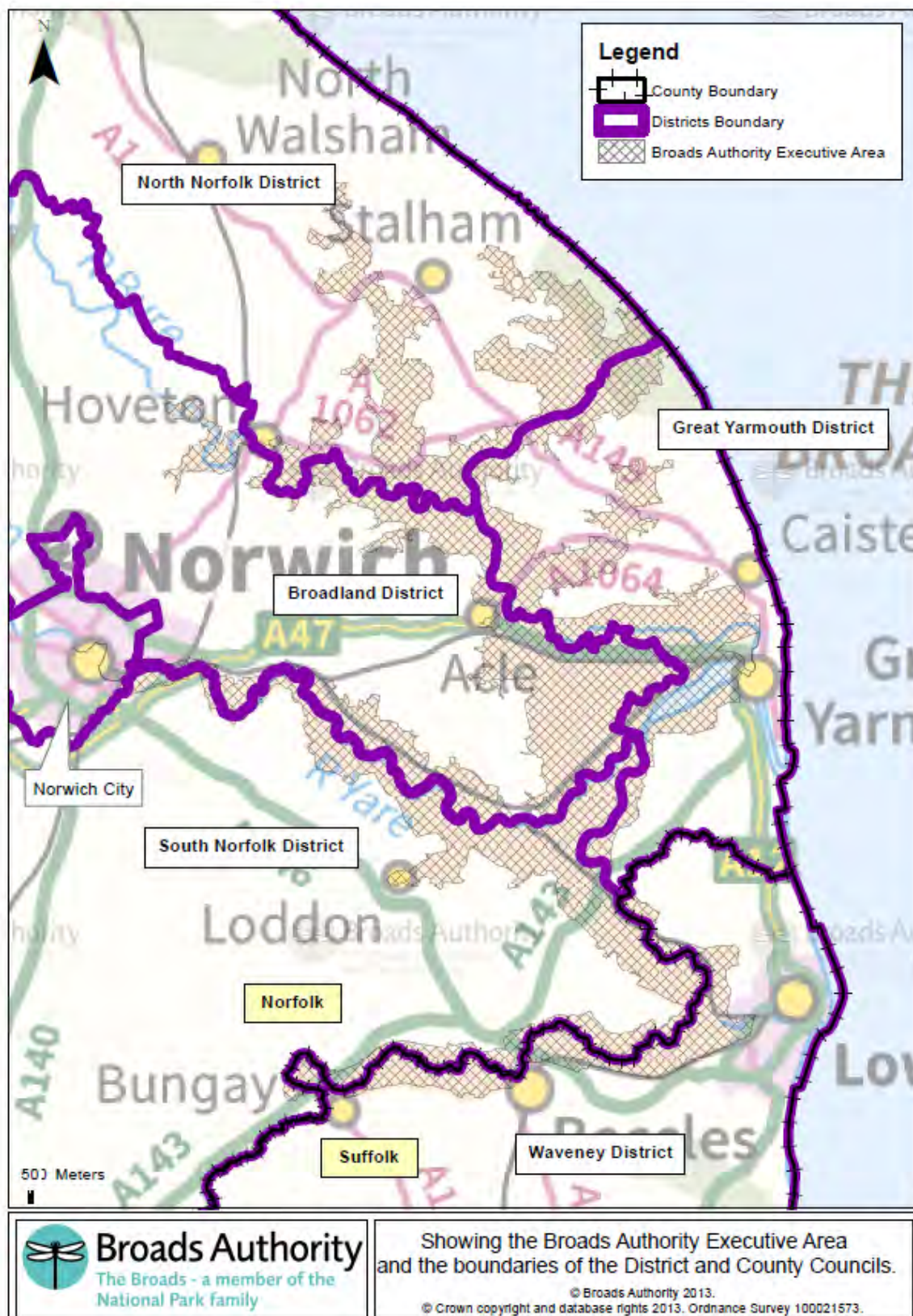
Formal consultations between the Authority and the MMO, including on the Broads Local Plan.

18 LEP and LNPs

The Broads Authority has representatives on Wild Anglia's Board (Andrea Kelly, Senior Ecologist) and also part of the stakeholder group of New Anglia (John Packman, Chief Executive and also Andrea Long, Director of Planning and Resources) who work closely with the Planning Policy Officer. At each stage of the process, New Anglia and Wild Anglia have been consulted.

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Appendix A: The Broads Executive Area, District Boundaries and County Boundaries.





Broads Local Plan
Sequential test of allocations
September 2016

Introduction

The Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The flood zones¹ as refined in the Strategic Flood Risk Assessment for the area provide the basis for applying the Test. The aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

Note: Table 2² categorises different types of uses & development according to their vulnerability to flood risk. Table 3³ maps these vulnerability classes against the flood zones set out in Table 1 to indicate where development is 'appropriate' and where it should not be permitted.

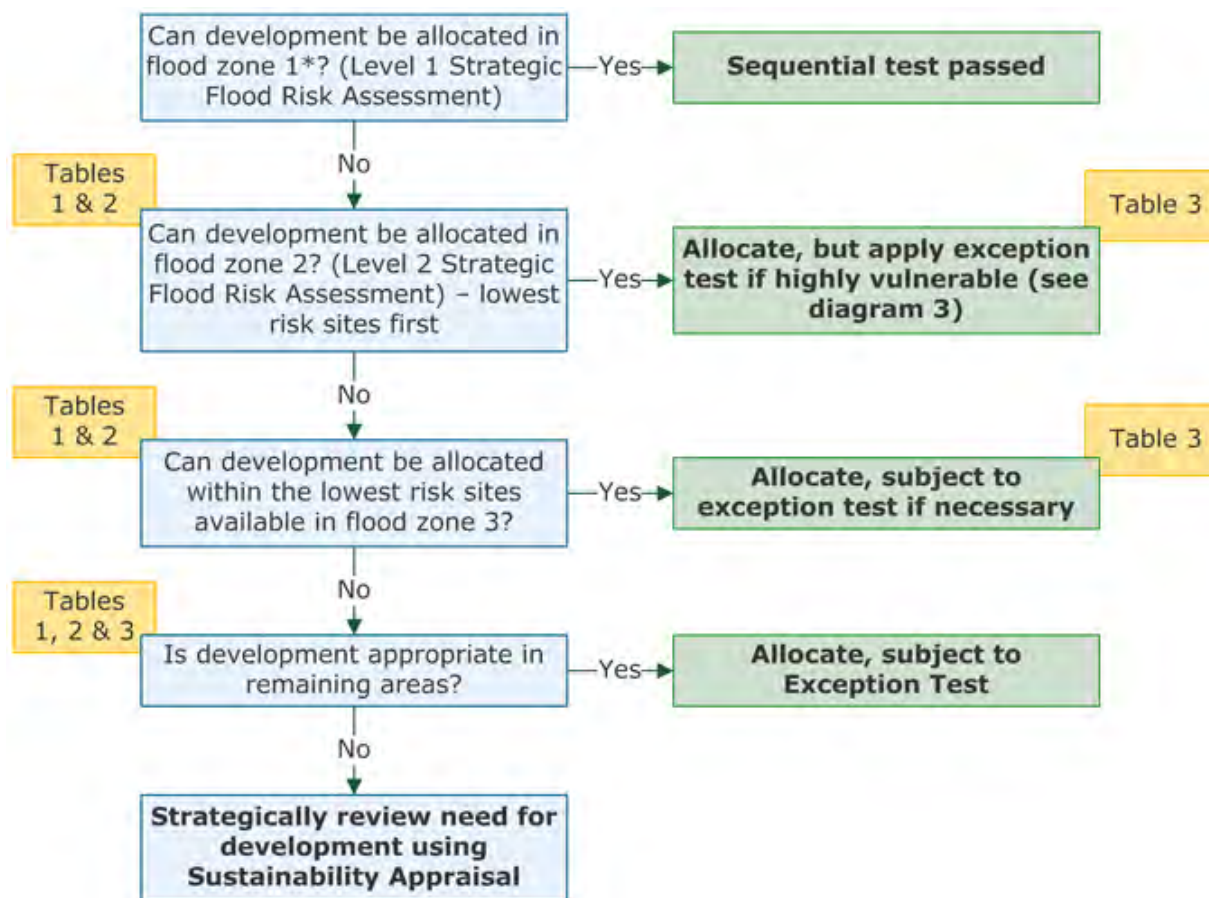
Within each flood zone, surface water and other sources of flooding also need to be taken into account in applying the sequential approach to the location of development.

The process for applying the sequential test is set out in the following diagram (taken from the NPPG).

¹ <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-1-flood-zones/>

² <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-2-flood-risk-vulnerability-classification/>

³ <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-3-flood-risk-vulnerability-and-flood-zone-compatibility/>



Please note that in the absence of an up to date Strategic Flood Risk Assessment, the Environment Agency flood zones have been used and it is presumed that in flood zone 3:

- 3a – if have buildings on
- 3b – if do not have buildings on

Sequential Text of all Site Allocation Policies.

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
ACL1	Cemetery extension	1	Not specifically covered. Nearest seems to be amenity open space so water compatible development. It is important to note that all proposals for burial grounds need to address Environment Agency requirements relating to groundwater.	Development is appropriate	N/A	Passes sequential test
ACL2	Playing field extension.	1	Water-Compatible Development	Development is appropriate	N/A	Passes sequential test
BEC1	Reinstatement of pub (Loaves and Fishes).	3a	More vulnerable (drinking establishment). Less vulnerable (if restaurant)	Exceptions test required if more vulnerable. Less vulnerable development is compatible.	N/A	The policy seeks to regenerate a vacant building. The building is where it is and cannot be moved. The policy raises the issue of flood risk.
BEC2	Residential moorings.	3b	Aware that the EA consider	The marina assessment indicates that	No as it is people living on boats which	The EA's interpretation passes the sequential test.

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			these as effectively marinas so water compatible. But also aware that people will live on these boats so there is a residential element of it which is more vulnerable.	development is appropriate and the residential element indicates that development should not be permitted.	then are on water.	Looking at the residential element in isolation, it does not. To reflect that this policy relates to people living on boats on water, the supporting text of the policy emphasises the issue of mooring technique and also the need for Flood Response Plans. See Appendix X.
BRU1	Riverside chalets and moorings plots	3a – chalets 3b – mooring plots (generally free of structures)	Chalets - More vulnerable Mooring plots - presume similar to amenity open space so water compatible development	Chalets - Exception Test required Mooring plots - Development is appropriate	On site, yes	Chalets - policy states that additional more vulnerable uses will not be permitted. Relates to changes to the existing land use such as replacement or extensions and policy refers to area being constrained due to flooding. Design response to flooding is a specifics issue to be dealt with through planning application process. Mooring plots – passes the sequential test.
BRU2	Riverside estate boatyards etc	3a	Presume same as marina/ship building so water compatible	Development is appropriate	N/A	Passes sequential test

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			development			
BRU3	Brundall mooring plots	3b (generally free of structures)	Presume similar to amenity open space so water compatible development.	Development is appropriate	N/A	Passes sequential test
BRU4	Brundall Marina	3a	Water-Compatible Development	Development is appropriate	N/A	Passes sequential test
BRU5	Land east of Yare House – amenity open space	2 (part of)	Water-Compatible Development	Development is appropriate	N/A	Passes sequential test
BRU6	Brundall Gardens residential moorings.	3b	Aware that the EA consider these as effectively marinas so water compatible. But also aware that people will live on these boats so there is a residential element of it which is more vulnerable.	The marina assessment indicates that development is appropriate and the residential element indicates that development should not be permitted.	No as it is people living on boats which then are on water.	The EA's interpretation passes the sequential test. Looking at the residential element in isolation, it does not. To reflect that this policy relates to people living on boats on water, the supporting text of the policy emphasises the issue of mooring technique and also the need for Flood Response Plans. See Appendix X.
CAN1	Sugarbeet works.	Some 3a and some 1.	Less vulnerable	Development is appropriate	N/A	Passes sequential test
DIL1	Tyler's Cut	Part in 3b	Presume similar	Development is	N/A	Passes sequential test

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
	Moorings.		to amenity open space so water compatible development.	appropriate		
DIT2	Sport and recreation. Main building (including a drinking establishment).	Main building and approximately half the area in flood zone 1. Rest of area in flood zone 2. Where there are some buildings – 3a. Where just sports field, 3b.	Drinking establishment is more vulnerable. Outdoor sport and recreation and essential facilities is water compatible.	Development is appropriate	On site, yes if needed.	Passes sequential test
DIT3	Open space, Beck and habitat area	2	Amenity open space.	Development is appropriate	N/A	Passes sequential test
GTY1	Regeneration of brownfield site which is compatible with flood risk.	3a	Will be more or less vulnerable or water compatible as the policy states this.	Development is appropriate/Exceptions Test required.	No.	Passes sequential test
HOR2	Car parking	Small part flood zone 2 and 3a.	Presume this is the same as building for storage – less vulnerable.	Development is appropriate	N/A.	Passes sequential test
HOR3	Open space	3a	Water compatible.	Development is appropriate	N/A.	Passes sequential test
HOR4	Waterside plots	3a – buildings	Buildings - more	Exception test required	N/A	Passes sequential test as

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
	including some buildings. General upkeep.	3b – gardens/mooring plots	vulnerable (dwellings). Gardens – water compatible	if new.		policy may address dwellings, but only relates to upkeep rather than new.
HOR5	Sailing club buildings.	3a	Water compatible.	Development is appropriate	N/A.	Passes sequential test
HOR6	Nature conservation.	3b	Water compatible.	Development is appropriate	N/A.	Passes sequential test
HOR7	Employment, boatyards and residential moorings.	3a	Employment – less vulnerable. Boatyards – water compatible. Residential moorings (see text at end).	Development is appropriate	N/A.	Passes sequential test
HOR8	Seeks minimal development.	3b	Water compatible.	Development is appropriate	N/A.	Passes sequential test
HOR9	Live work units.	Part in 3a.	Less vulnerable on lower floor. More vulnerable on upper floor.	Development is appropriate	N/A.	Passes sequential test
HOV2	Green Infrastructure.	Part in 3b.	Water compatible.	Development is appropriate	N/A.	Passes sequential test
HOV3	Car parking	Small part flood zone 2 and 3a.	Presume this is the same as building for storage – less vulnerable.	Development is appropriate	N/A.	Passes sequential test
HOV4	Not included in Preferred Options. Awaiting retail evidence.					

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
HOV5	Land on Station Road. Holiday accommodation, retail, food and drink, dwellings.	Part 3a and 2.	Dwellings and drinking establishments: more vulnerable. Retail: less vulnerable. Restaurants: less vulnerable.	Exceptions test require for more vulnerable. Less vulnerable, development in appropriate.	On site, yes.	Passes sequential test. Note that only part of the land is in flood zone 3a. Also that the policy seeks to regenerate brownfield land which cannot move.
NOR1	Mixed use scheme including dwellings.	Part 3a. Most 2.	More vulnerable.	Exception test if in 3a. Development is appropriate in 2.	On site, yes.	Passes sequential test. Note that only part of the land is in flood zone 3a. Also that the policy seeks to regenerate brownfield land which cannot move.
NOR2	Walking and cycling route.	Part 3a. Most 2.	Water compatible as presume outdoor recreation.	Development is appropriate	N/A.	Passes sequential test
ORM1	Waterworks.	Majority 3a.	Less vulnerable and water compatible depending on precise operation.	Development is appropriate	On site, yes.	Passes sequential test
OUL2	Leisure plots.	Part 3a (structures) or 3b (no structures) and some 2.	Amenity open space so water compatible.	Development is appropriate	On site, yes.	Passes sequential test
OUL3	Mixed use	3a	Employment –	Employment –	On site, yes.	Passes sequential test.

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
	scheme including dwellings and employment.		less vulnerable. Dwellings – more vulnerable.	development is appropriate. Dwellings – exceptions test.		Note that the policy seeks to regenerate brownfield land which cannot move.
POT1	Not included in Preferred Options. Awaiting retail evidence.					
POT2	Waterside plots. Some with chalets, some for mooring and some undeveloped.	Undeveloped plots – 3b. With structures on – 3a.	Undeveloped, presume amenity open space so water compatible. With chalets – more vulnerable.	Undeveloped – appropriate. Chalets – exceptions test required.	No as the entire plot tends to be subject to flood risk.	Policy seeks mainly to maintain or improve the current situation. Does not seek significant change. So policy passes sequential test.
POT3	Green bank zones.	3b	Presume amenity open space so water compatible.	Development is appropriate	N/A.	Passes sequential test
SOL1	Moorings and mooring plots.	3b	For the mooring of boats so presume similar to boatyards and marinas so water compatible. Also part amenity open space.	Development is appropriate	N/A.	Passes sequential test
SOL2	Re-use building in a flood risk compatible way.	3a	Retail, office and restaurant – less vulnerable. Dwellings and drinking	More vulnerable uses require an exceptions test. Less vulnerable – development is	N/A.	Passes sequential test. Note that the policy seeks to regenerate brownfield land which cannot move.

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
			establishments – more vulnerable.	appropriate.		
STA1	Boatyard, employment use and residential moorings.	3a	Employment – less vulnerable. Boatyards – water compatible. Residential moorings (see text at end).	Development is appropriate	N/A.	Passes sequential test
TSA1	Open space	Small part 3b, most 2.	Water compatible as amenity open space.	Development is appropriate	N/A.	Passes sequential test
TSA3	Boatyard and dockyard.	3a.	Docks and boatyards so water compatible.	Development is appropriate	N/A.	Passes sequential test
TSA4	Mooring plots and boatyards.	Undeveloped plots – 3b. With structures on – 3a.	Presume amenity open space so water compatible. Boatyard water compatible too.	Development is appropriate	N/A.	Passes sequential test
TSA6	Open space.	3b	Water compatible as amenity open space.	Development is appropriate	N/A.	Passes sequential test
THU1	Dwellings.	Part in 3a and some in 2.	More vulnerable.	Exception test required for part in 3a. Part in 2	On site, yes.	Passes sequential test. Note that the policy seeks to

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
				development is appropriate.		regenerate brownfield land which cannot move.
WES1	Dwelling.	2	More vulnerable.	Development is appropriate	N/A.	Passes sequential test
WHI1	Country park.	Some 3a – where there are structures. Some 3b – where there is open space. Rest 1. Café and car park in flood zone 1.	Amenity open space, recreation and sport and changing facilities water compatible. Café less vulnerable. Car park – presume storage so less vulnerable.	Development is appropriate	N/A.	Passes sequential test
XNS1	Trinity Broads. Seeks quiet recreation.	3a and 3b.	Presume amenity open space so water compatible.	‘Development’ is appropriate.	N/A.	Passes sequential test
XNS2	Upper Thurne. Seeks quiet recreation.	3a and 3b.	Presume amenity open space so water compatible.	‘Development’ is appropriate.	N/A.	Passes sequential test
XNS3	The Coast. Seeks quiet recreation and low key structures.	3a and 3b.	Presume amenity open space or structures associated with recreation so water	‘Development’ is appropriate.	N/A.	Passes sequential test

Policy and location	Brief description	Flood zone	Vulnerability class	Compatibility	Can development be allocated in lowest risk sites?	Conclusions
Wroxham Development Boundary	subject to other policies.			to not being appropriate in 3b.		Whether the sequential test is passed or an exceptions test is needed will depend on the proposal and the location.
Thorpe St Andrew Development Boundary.						
Recreation routes.	Three routes of former railways are safeguarded for future walking, cycling and horse riding routes.	Most in 2, some could be in 3a and 3b.	Presume outdoor sport and recreation so water compatible.	Development is appropriate	N/A.	Passes sequential test

Residential moorings and flood risk

The Environment Agency consider residential moorings in the same way as they do marinas and boatyards and these are classed as **water compatible** by the NPPG. However, there is a residential use of the moorings with people living on the boats that are moored with their personal belongings; residential dwellings rate as **more vulnerable** by the NPPG. In reality it could be argued that the vulnerability rating of residential moorings is somewhere between water compatible and more vulnerable. That is to say that the boats are designed to float and will continue to float when there is a flood – they will not be flooded like buildings on land in an area of flood risk. That being said, there are some important considerations for boats moored at residential moorings at times of flood:

- If for example the vessel is moored too tight, it may not rise with the flood waters in a safe way and the mooring technique could cause the boat to list to one side causing safety concerns to those in the boat and resulting in damaged belongings.
- If moored too loosely the boat could be 'hung up' whereby it has floated onto the edge or landside of the quay heading and when water resides, could tip over and sink.

- In extreme cases, the vessel could be cast adrift and at times of flood it is not always clear where the main river channel is. Furthermore, unless under control, the vessel could collide with other vessels or objects damaging itself and the object or vessel it hits.
- The access to the vessel may be disrupted so if the occupier is on board at the time of flood, how will they escape or will they have enough provisions to be able to sit out the flood? Which is the safest option?

As such, it is proposed that the policies relating to residential moorings will have the following as part of the reasoned justification.

Reasoned Justification

Proposals for residential moorings need to ensure they have adequately considered the following:

1. The technique/method of mooring the vessel. By being too tight, the vessel could list and by being too loose the vessel could float onto the landside of the quay heading or be cast adrift at times of flooding. Both scenarios have safety concerns relating to occupiers, possessions and other objects or vessels that could be hit by a loose boat.
2. A Flood Response Plan needs to be produced. Whilst it is acknowledged that residential boats will float, the access to the boat could be disrupted at times of flood with the occupier effectively stuck on board the boat. What will the occupier do at times of flood? Will they have another way of escaping from the boat or have supplies to help them sit out the flood? Which is the safest option? The Flood Response Plan will need to address these concerns.
3. Finally, how will the boat moored at the residential mooring itself be monitored at times of flood so it does not cause damage to other vessels and also prevent damage to the belongings on board (and indeed the boat itself).

Permission in Principle

The Housing and Planning Bill 2015, included measures to introduce a 'permission in principle' (PiP) on land allocated for development in a qualifying document such as a brownfield register, development plan or neighbourhood plan.

Permission in Principle may be granted for housing led development but not for the winning and working of minerals. It may be granted in relation to land that is allocated for development in a Local Plan and lasts for 5 years. Subsequent applications for technical details consent (TDC) s then have to be determined in accordance with the permission in principle. The result would be the grant of full planning permission.

Regulations are expected by the end of 2016 which will give more information relating to how to implement this requirement. The Broads Authority will keep Members informed of progress and will reflect Permission in Principle in the Publication version of the Local Plan.

The policies to which Permission in Principle could apply are:

- NOR1 – Utilities Site
- OUL3 – Pegasus site
- THU1 – Hedera House

Useful explanation: <http://nlpplanning.com/blog/housing-and-planning-act-2016-essential-guide-to-pips-may-2016/>

The Housing and Planning Act 2016 can be found here: http://www.legislation.gov.uk/ukpga/2016/22/pdfs/ukpga_20160022_en.pdf



How the Issues considered in the Issues and Options have been taken forward.

Issue 1: how should we address run off from boat wash in the new Local Plan?

A new policy is included in the Preferred Options. See policy PODM2

Issue 2: How to address water efficiency of residential developments in the Local Plan

A new policy is included in the Preferred Options. See policy PODM3

Q: Do you have any thoughts on how the Local Plan should address water usage of non-residential development?

A new policy is included in the Preferred Options. See policy PODM3

Issue 3: How to address sewerage treatment in the Broads.

A new policy is included in the Preferred Options. See policy PODM1

Q: Do you have any thoughts on flood risk in the Broads Executive? Do you have any thoughts on how the Local Plan should address flood risk? Is there scope to have a Broads-specific exceptions test?

A new policy is included in the Preferred Options. See policy PODM4 and POSP4. A Flood Risk SPD is being produced that will inform the new final policy.

Q: Do you have any thoughts on how the Local Plan should address SuDS and whether there should be any requirement for particular types of SuDS in the Broads?

A new policy is included in the Preferred Options. See policy PODM5.

Issue 4: How to address land-based open space, allotments and play requirements in the Broads.

A new policy is included in the Preferred Options. See policy PODM6.

Q: Do you have any thoughts on water open space, staithes and slipways?

A new policy is included in the Preferred Options. See policy PODM7.

Issue 5: how do we address Green Infrastructure in the Broads Executive Area?

A new policy is included in the Preferred Options. See policy PODM8.

Q: Are there any areas you would like to nominate as Local Green Space?

A new policy is included in the Preferred Options. See policy POXNS12. Also see the Local Green Space Assessment Report.

Issue 6: how should we address climate change in the Local Plan?

A new policy is included in the Preferred Options. See policy DM9 and POSP5.

Issue 7: how should we address peat affected by land use change in the Broads?

A new policy is included in the Preferred Options. See policy PODM10.

Issue 8: how do we give further weight to the Local List and undesignated heritage assets (that we know about and those that we do not know about)?

A new policy is included in the Preferred Options. See policy PODM11.

Q: Is having a guide for waterside chalets and no specific policy an approach which you support?

A guide has been produced.

Issue 9: how can the Local Plan help enable restoration of the drainage mills of the Broads?

An amended policy is included in the Preferred Options. The Authority continues to look into the Mills and how they can be regenerated.

Issue 10: how can the Local Plan address interpretation of the historic environment and culture in the Broads?

A new policy is included in the Preferred Options. See policy PODM11.

Issue 11: how can we give non-designated sites recognition?

Whilst the NPPF at 14.3 would give this policy approach teeth, and indeed acknowledge the support for this extra tier of protection that is apparent from comments at the Issues and Options stage, after a long discussion with Development Management Officers and the Senior Ecologist it became evident that the Authority does not have a complete assessment of the entire Broads that identifies these features. Without identifying the features we wish to protect on a map, the policy is not useful. There are no resources at the moment to complete the work needed to identify non designated habitat of value. This cannot be completed using aerial photography alone as it needs ground trothing to understand the quality of the habitat. POLICY APPROACH NOT TAKEN FORWARD.

Issue 12: how can we protect habitats and species on brownfield sites?

A new policy is included in the Preferred Options. See policy PODM13.

Issue 13: how can we compensate for residual adverse biodiversity impacts arising from a development after mitigation measures have been taken?

This is addressed in the Planning Obligations policy.

Issue 14: how should we consider land-raising in the new Local Plan?

A new policy is included in the Preferred Options. See policy PODM17.

Issue 15: how should we consider disposing of excavated material in the new Local Plan?

A new policy is included in the Preferred Options. See policy PODM18.

Issue 16: how should we address landscaping design in the new Local Plan?

A new criteria in the design policy is included in the Preferred Options. See policy PODM40.

Issue 17: how should we address overhead lines in the new Local Plan?

A Development Management Policy has been amended to address this issue. See policy PODM19.

Issue 18: how should we consider settlement fringe in the new Local Plan?

A new policy is included in the Preferred Options. See policy PODM20.

Q: Do you have any thoughts on existing policy DP28?

An improved policy is included in the Preferred Options. See policy PODM21.

Q: Are there any other areas in the Broads that you think are tranquil or offer quiet recreation which should be specifically protected?**Issue 19: how should we address tranquillity?**

Tranquillity study not completed. Have assessed Dark Skies so have a strong light pollution policy. Also have strong amenity policy. Upper Thurne and Trinity Broads are protected for their tranquillity. So too is the coastal area. Many suggestions for areas of tranquillity relate to these areas which are already protected. No forms filled out to accompany suggested areas for tranquillity and any suggestions not accompanied by email addresses to ask for a form to be completed. Some felt that boat engines were loud so it is difficult to get away from it all. But others knew of tranquil areas or felt there are many areas that are tranquil but did not specify where. Norfolk County Council considered that tranquil areas are favoured by wildlife so to protect them as tranquil areas could be a way of advertising them as such and therefore increase usage thus threatening the wildlife.

A strategic policy has therefore not been taken forward because:

- areas are already protected*
- no specific study has been completed (without a study, no evidence to assess proposals against in terms of location and tranquillity)*
- the area varies from hustle and bustle to quiet and calm...*

Issue 20: how should we address light pollution?

A new policy is included in the Preferred Options. See policy PODM22.

Issue 21: how to address waste in the Broads Local Plan

After liaising with Norfolk County Council regarding a potential new policy on waste management, it was decided that the waste elements of the Broads Development Management DPD policies DP4, DP16 and DP25 suffice. It was generally agreed that the waste elements of these policies should be rolled forward. The issue of construction waste could be addressed in a sustainable development policy.

Issue 22: How can the Local Plan address the Full Objectively Assessed Housing Need of the Broads?**Q: Do you have any comments on the issue of meeting the objectively assessed housing need of the Broads?**

A new policy is included in the Preferred Options. See policy PODM31.

Issue 23: How can the Local Plan address Gypsy and Traveller needs?

Gypsy and Traveller evidence yet to be commissioned. This issue will be addressed in the publication version of the Local Plan although there is a new criteria based policy. See policy PODM31.

Q: Are there any areas which you think are suitable for residential moorings?

One area has been nominated and assessed. See policy PODM35 and POBEC2 and the Residential Moorings Assessment Report.

Q: What are your thoughts on floating buildings? Do you have any evidence to address the issues raised?

Further work will be completed to inform the publication version of the Local Plan.

Issue 24: How can the Local Plan address the issue of rural enterprise dwellings?

An amended policy is included in the Preferred Options. See policy PODM36.

Issue 25: How should the Local Plan address second homes in the Broads?

The tourism policies address this issue adequately. See policy PODM27.

Issue 26: How can the Local Plan support those who wish to build their own homes?

A new policy is included in the Preferred Options. See policy PODM39.

Issue 27: how to address design in the Broads Local Plan

An amended policy is included in the Preferred Options. See policy PODM40.

Issue 28: How to address energy efficiency in the Local Plan

An amended policy is included in the Preferred Options. See policy PODM14.

Issue 29: How can the Local Plan address the issue of residential items and equipment associated with residential moorings?

An amended policy is included in the Preferred Options. See policy PODM47 and PODM35.

Issue 30: how should we consider leisure plots in the new Local Plan?

An amended policy is included in the Preferred Options. See policy PODM47.

Q: Do you have any thoughts on space standards? Do you have any evidence that the Authority needs to address this through the Local Plan?

No evidence for specific space standards for development in the Broads has come forward. So no new policy on this issue.

Issue 31: How to address accessibility and wheelchair standards in the Local Plan

An amended policy is included in the Preferred Options. See policy PODM40.

Issue 32: how do we address sport and recreational buildings in the Broads Executive Area?

An amended policy and new policy is included in the Preferred Options. See policy PODM41, POFLE1 and PODIT2.

Issue 33: How can we design places for healthy lives?

A new policy is included in the Preferred Options. See policy PODM42.

Issue 34: how to address retail issues in the Broads Local Plan

Discussions ongoing with Waveney and North Norfolk District Councils regarding a joint policy approach for some retail areas. Policy will be included in the Publication version of the Local Plan.

Issue 35: How can the Local Plan address the dualling of the Acle Straight?

A new policy is included in the Preferred Options. See policy PODM24.

Issue 36: How can the Local Plan safeguard future recreation routes?

A new policy is included in the Preferred Options. See policy POXNS11.

Issue 37: How to address car parking in the Local Plan

Car parking in relation to recreation is addressed in the Preferred Options. See policy PODM25.

Issue 38: what should the Authority's approach be for redundant boatyards or boatyard buildings?

Awaiting economy evidence. Issue will be addressed in the publication version of the Local Plan.

Issue 39: How to address location of new employment land in the Local Plan

Awaiting economy evidence. Issue will be addressed in the publication version of the Local Plan.

Option 2 not taken forward as considered that this could stifle economy. There would likely be lots of exceptions e.g. boatyards and tourism development. The areas where the development boundaries chosen are not necessarily appropriate for employment

Issue 40: how to address sustainable tourism in the Local Plan?

A new policy is included in the Preferred Options. See policy PODM26 and POSP9.

Issue 41: how do we make the mooring provision as a result of related development more deliverable and reasonable?

New text added to existing policy. See policy PODM30.

Issue 42: how should we consider safety by the water in the new Local Plan?

A new policy is included in the Preferred Options. See policy PODM43.

Q: What are your thoughts on rolling forward DP30?

An amended policy is included in the Preferred Options. See policy PODM44.

Issue 43: how do we protect the car parking area near Staithe and Willow?

A new policy is included in the Preferred Options. See policy PODM44.

Issue 44: how to address Thorpe Island in the Local Plan?

A new policy is included in the Preferred Options. See policy PODMTSA2.

Issue 45: do we protect the live/work units at Ferry Corner through the Local Plan and if so, how?

A new policy is included in the Preferred Options. See policy POHOR9.

Q: What are your thoughts on these sites? Are there any changes you would like to see and why? Are there any other areas similar to those listed that you would like to propose for inclusion in the Local Plan?

Beccles Old Hotel Site, opposite Morrison's.

Not addressed in local plan. Flood risk and highway access an issue. Also landscape and townscape character. Well maintained as is.

Bridge Hotel, Potter Heigham

Not addressed in the Preferred Options. There could be potential for a masterplan for the entire area.

Little Precinct in Hoveton

Not addressed in local plan. The area seems to be functioning well as it is.

Former Waterside Rooms at Hoveton

A new policy is included in the Preferred Options. See policy POHOV5.

Former Loaves and Fishes Pub at Beccles

A new policy is included in the Preferred Options. See policy POBEC1.

Reference	What has happened to policy	Reference Number in Preferred Options
DP1	Policy rolled forward with slight amendments.	PODM13
DP2	Policy rolled forward with slight amendments.	PODM16
DP3	Policy rolled forward with slight amendments.	PODM1
DP4	Policy rolled forward with slight amendments.	PODM40
DP5	Policy rolled forward with slight amendments.	PODM11
DP6	Policy rolled forward with slight amendments.	PODM12
DP7	Policy rolled forward with slight amendments.	PODM14
DP8	Policy rolled forward with slight amendments.	PODM15
DP9	Policy rolled forward with slight amendments- now utilities infrastructure	PODM19
DP10	Policy rolled forward with slight amendments.	PODM46
DP11	Policy rolled forward with slight amendments.	PODM23
DP12	Policy rolled forward with slight amendments.	PODM28
DP13	Policy rolled forward with slight amendments.	PODM29
DP14	Policy rolled forward with slight amendments.	PODM26
DP15	Policy rolled forward with slight amendments.	PODM27
DP16	Policy rolled forward with slight amendments.	PODM30
DP17	Policy rolled forward with slight amendments.	PODM47
DP18	Will be assessed following employment study completion.	See economy section
DP19	Will be assessed following employment study completion.	See economy section
DP20	Will be assessed following employment study completion.	See economy section
DP21	Policy rolled forward with slight amendments.	PODM45
DP22	Forms part of Development Boundary policy.	PODM33
DP23	Policy rolled forward with slight amendments.	PODM32
DP24	Policy rolled forward with slight amendments.	PODM38
DP25	Policy rolled forward with slight amendments.	PODM35
DP26	Policy rolled forward with slight amendments.	PODM36
DP27	Rolled forward with slight changes and combined with CS25.	PODM41
DP28	Policy rolled forward with slight amendments.	PODM21
DP29	Policy rolled forward with slight amendments.	PODM4
DP30	Policy rolled forward with slight amendments.	PODM44
CS1	Incorporated into a new sustainable development policy.	POSP2
CS2	Incorporated into a new sustainable development policy.	POSP2
CS3	Rolled forward with some slight amendments. Combined with CS13 and CS15.	POSP10
CS4	Incorporated into a new sustainable development policy.	POSP2
CS5	Policy rolled forward with slight changes. Combined with CS6	POSP6
CS6	Policy rolled forward with slight changes. Combined with CS5	POSP6
CS7	Policy rolled forward with slight changes	POSP3
CS8	Policy rolled forward with slight changes	POSP5
CS9	Combined into tourism strategic policies.	POSP9
CS10	Discarded. Approach no longer deemed necessary.	-
CS11	Combined into tourism strategic policies.	POSP9
CS12	Combined into tourism strategic policies.	POSP9
CS13	Rolled forward with some slight amendments. Combined with CS3 and CS15.	POSP10
CS14	Rolled forward with some slight amendments.	POSP11
CS15	Rolled forward with some slight amendments. Combined with CS3 and CS13.	POSP10
CS16	Rolled forward with some slight amendments.	POSP7
CS17	Rolled forward with some slight amendments.	POSP8
CS18	Rolled forward with some slight amendments. Combined with CS24.	POSP12
CS19	Combined into tourism strategic policies.	POSP9
CS20	Many changes to reflect changes in national flood risk policy since the core strategy.	POSP4
CS21	Combined into tourism strategic policies.	POSP9
CS22	Will be assessed following employment study completion.	See economy section
CS23	Will be assessed following employment study completion.	See economy section
CS24	Rolled forward with some slight amendments. Combined with CS18.	POSP12
CS25	Combined with DP27	PODM41
ACL1	Rolled forward with some slight amendments.	POACL1
ACL2	Rolled forward with some slight amendments.	POACL2
BRU1	Rolled forward with some slight amendments.	POBRU1
BRU2	Rolled forward with some slight amendments.	POBRU2
BRU3	Rolled forward with some slight amendments.	POBRU3

BRU4	Rolled forward with some slight amendments.	POBRU4
BRU5	Rolled forward with some slight amendments.	POBRU5
BRU6	Rolled forward with some slight amendments.	POBRU6
CAN1	Rolled forward with some slight amendments.	POCAN1
DIL1	Rolled forward with some slight amendments.	PODIL1
DIT1	Discarded. Development built out. New open space policy proposed (to follow)	-
DIT2	Rolled forward with some slight amendments.	PODIT2
GTY1	Rolled forward with some slight amendments.	POGTY1
HOR1	Forms part of Development Boundary policy.	PODM33
HOR2	Rolled forward with some slight amendments.	POHOR2
HOR3	Rolled forward with some slight amendments.	POHOR3
HOR4	Rolled forward with some slight amendments.	POHOR4
HOR5	Rolled forward with some slight amendments.	POHOR5
HOR6	Rolled forward with some slight amendments.	POHOR6
HOR7	Rolled forward with some slight amendments.	POHOR7
HOR8	Rolled forward with some slight amendments.	POHOR8
HOV1	Forms part of Development Boundary policy.	PODM33
HOV2	Rolled forward with some slight amendments.	POHOV2
HOV3	Rolled forward with some slight amendments.	POHOV3
HOV4	Policy relates to retail. Discussions ongoing with North Norfolk District Council regarding retail work as well as joined approach with regards to this town centre which is partly within NNDC and partly within BA.	See retail section
NOR1	Rolled forward with some slight amendments.	PONOR1
NOR2	Rolled forward with some slight amendments.	PONOR2
ORM1	Rolled forward with some slight amendments.	POORM1
OUL1	Forms part of Development Boundary policy.	PODM33
OUL2	Rolled forward with some slight amendments.	POOUL2
OUL3	Rolled forward with some slight amendments.	POOUL3
POT1	Retail element to reflect future retail work with NNDC. Potential for a masterplan being considered.	See retail section
POT2	Rolled forward with some slight amendments.	POPOT2
POT3	Rolled forward with some slight amendments.	POPOT3
SOL1	Rolled forward with some slight amendments.	POSOL1
SOL2	Rolled forward with some slight amendments.	POSOL2
STA1	Rolled forward with some slight amendments.	POSTA1
TSA1	Rolled forward with some slight amendments.	POTSA1
TSA3	Rolled forward with some slight amendments.	POTSA3
TSA4	Rolled forward with some slight amendments.	POTSA4
TSA5	Forms part of Development Boundary policy.	PODM33
TSA6	Rolled forward with some slight amendments.	POTSA6
THU1	Rolled forward with some slight amendments.	POTHU1
WES1	Discarded. Development built out.	-
WHI1	Rolled forward with some slight amendments.	POWHI1
XNS1	Rolled forward with some slight amendments.	POXNS1
XNS2	Rolled forward with some slight amendments.	POXNS2
XNS3	Rolled forward with some slight amendments.	POXNS3
XNS4	Rolled forward with some slight amendments.	POXNS4
XNS5	Rolled forward with some slight amendments.	POXNS5
XNS6	Rolled forward with some slight amendments.	POXNS6
XNS7	Rolled forward but combined with other 'new' routes.	POXNS11
XNS8	Rolled forward with some slight amendments.	POXNS8
XNS9	Forms part of Development Boundary policy.	PODM33
TSA2	Amended to update in light of various court decisions.	POTSA2

**Broads Local Plan
Preferred Options consultation, December to February.
Consultation Plan**

Introduction

The Preferred Options are set to published for public consultation between 5 December 2016 and 3 February 2017. The consultation period covers 9 weeks as it includes the Christmas period..

Documents to be consulted on

- The Preferred Options version of the Local Plan
- The Sustainability Appraisal
- The Habitats Regulation Assessment
- The various pieces of evidence and the topic papers are also available for comment.

Advanced notice of the consultation has been given

- Emailed Parish Councils in July 2016 to give prior notification of consultation.
- A reminder of the Local Plan consultation will go out with the Broads Plan email/letter in October2016 and the Flood Risk SPD consultation in November2016.

Advertising the consultation.

- Email or letter to all on our contact database.
- Press advert.
- Press release to go out at the start of the consultation period as well as early January to act as a reminder.

Versions of the Local Plan

- Hard copies at libraries and Council offices
- Summary leaflet. This will include one line description of the thrust of the policy and ask for comments. There will be a link to the main document so people can read the detail policy if they wish.
- Copies of the documents will be available on line.

Drop in sessions

- Posters to go on Parish notice boards to advertise drop in sessions.
- Advertised through the press release and press advert.
- Three drop in sessions – on a Saturday am/pm and weekday evening. One in the north, central area and south.
- Venues and dates to be confirmed.

Assessment of Local Plan against adopted Neighbourhood Plans:

The NPPF at paragraph 155 says: *‘early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, **including those contained in any neighbourhood plans that have been made**’.*

As such, the following table shows the visions and objectives of the various adopted Neighbourhood Plans and explains how these are addressed in the Local Plan. It is important to note that not all of the area of the parishes to which the Neighbourhood Plans apply is within the Broads.

Acle Neighbourhood Plan

Acle Neighbourhood Plan	Local Plan assessment
The vision for the Neighbourhood Plan is to ensure that Acle continues as a flourishing village and gateway to the broads that maintains a strong sense of community whilst embracing a sustainable and prosperous future as a place where people choose to live, work and visit.	Local Plan generally supports the sentiments of the vision.
O1: To improve the ability of the village centre to be used for community events O2: To support enhanced education facilities for all age groups O3: To improve access to formal and informal sports and leisure provision. O4: To improve conditions for walking and cycling from the village centre to the surrounding countryside O5: To reduce the dominance of the highway in the village centre O6: To support enhanced public transport infrastructure. O7: To enhance the attractiveness, vitality and viability of the village centre for small scale town centre uses, particularly for retailing O8: To ensure that employment sites are developed for an appropriate mix of employment uses O9: To improve the attractiveness of Acle for inward investment. O10: To promote the integration of new housing development into the social and physical fabric of the village	Specifically, the Local Plan has policies relating to sports fields in Acle. More generally, the Local Plan generally supports these objectives where they are relevant to the Broads.

Brundall Neighbourhood Plan

Brundall Neighbourhood Plan	Local Plan assessment
Our vision for Brundall is to remain a high-quality rural village surrounded by tranquil open countryside and the Broads landscape where people want to live, visit, work and engage with a vibrant and thriving community.	Local Plan generally supports the sentiments of the vision.
<ol style="list-style-type: none">1. To improve links between the village and surrounding countryside including the Broads.2. To protect and enhance existing landscape and wildlife areas around the village.3. To protect and enhance local distinctiveness in the built and natural environment and to protect the setting of designated heritage assets.4. To protect and enhance the unique cluster of marine related businesses at Brundall Riverside.5. To support and enhance opportunities for local businesses.6. To support and enhance the visitor economy.7. To support the enhancement and growth of education facilities in the village for all age groups.8. To strengthen and enhance the existing village centres along The Street and Strumpshaw Road.9. To improve conditions for walking and cycling around and through the village and increase use of public transport.	<p>Specifically, the Local Plan has policies relating to the cluster of marine businesses at Brundall Riverside as well as the open space near to the rail line. The site specific policies in general support the visitor economy.</p> <p>More generally, the Local Plan generally supports these objectives where they are relevant to the Broads.</p>

Strumpshaw Neighbourhood Plan

Strumpshaw Neighbourhood Plan	Local Plan assessment
<p>In 2026 the Parish will remain much as it is currently, with the tranquil and rural nature of the Parish being maintained and protected.</p> <p>Areas of high landscape value, the marshes and nature reserves will continue to be protected. The Parish will continue to have a distinctive difference from Lingwood and Brundall.</p> <p>The settlement limits in 2026 will be maintained as they are in 2013. The Parish will benefit from good quality improvements in community facilities to assist a thriving community to be maintained. The Plan will encourage the continuation of the Parish as a safe place in which to live.</p>	Local Plan generally supports the sentiments of the vision.

Strumpshaw Neighbourhood Plan	Local Plan assessment
<p>Employment provision in the Parish will be maintained at much the same level in 2026 as it is currently. Some provision for additional low key and low impact employment opportunities will be included.</p>	
<p>A. Environmental</p> <ol style="list-style-type: none"> 1. Maintain and protect the tranquil and rural nature of the whole of the Parish 2. Keep the built up core of Strumpshaw separate from those parts of Strumpshaw adjacent to Lingwood and Brundall 3. Resist any development which is in parts of the Parish that are outside the settlement limit 4. Maintain and protect areas of high landscape value, including wooded areas in private ownership, reflecting the landscape assessments undertaken by the Broads Authority and Broadland District Council. 5. Maintain and protect the marshes and nature reserves 6. Protect agricultural land use 7. Encourage the provision of green space in the built up core of the Parish <p>B. Social</p> <ol style="list-style-type: none"> 1. Ensure that a community meeting room continues to be provided in the Parish, easily accessible to the majority of residents 2. Ensure that sufficient allotments are provided to meet the needs of the residents of the Parish 3. Encourage the completion of the footpath along Norwich Road, Strumpshaw, between Beech Drive and Goat Lane 4. Encourage any new housing to be of a low density and of a vernacular design 5. Encourage the development of any new housing to include both affordable and lower cost market dwellings, including consideration of housing for elderly people 6. Resist the introduction of street lights 7. Promote a safe highway network, identifying measures to encourage adherence to traffic speed limits, and to reduce conflicts between vehicles and pedestrians <p>C. Economic</p> <ol style="list-style-type: none"> 1. Encourage the provision of small scale, low impact and low key employment opportunities 	<p>There are no site specific policies for Strumpshaw.</p> <p>More generally, the Local Plan generally supports these objectives where they are relevant to the Broads.</p>