

Broads Authority

Development Management Policies Development Plan Document

**SOUNDNESS
SELF ASSESSMENT**

Version: 31st March 2011

Broads Authority – Development Management Policies Development Plan Document (DMDPD)

Local Development Framework soundness self assessment

Introduction

This document has been prepared by the Broads Authority as an objective self assessment of the soundness of the Development Management Policies Development Plan Document which covers the Broads Executive Area. Throughout the production of the plan, the Authority has used the 'Soundness Toolkit' produced by the Planning Advisory Service (PAS) to help ensure that evidence requirements are met and that we fully comply with statutory requirements.

The toolkit reflects the revised Planning Policy Statement 12, the Plan Making Manual and Local Development Framework Regulations (and the Amendment). It is made up of two components, the first which concerns the legal compliance aspects and the second which focuses on the test of soundness.

The legal compliance toolkit in Appendix 1 has been compiled for each stage of development of the strategy and the comments made and evidence provided is relevant to the particular stage reached (and may be updated in later stages of the document).

Note on Status of the Regional Spatial Strategy

There are a number of references to the East of England Plan / RSS within the Plan – during the process of production of this document there have been numerous changes to the legal status of the RSS – initially revocation and then following a High Court Challenge reinstatement. Therefore references to the East of England Plan that have been made in the various iterations of the DMDPD have been made as correct at the time of writing.

Schedule of Proposed Minor (Post-Publication) Changes

Following Pre-submission (publication) consultation (December 2010 –January 2011), the Authority determined that it was appropriate to prepare a schedule of proposed minor changes, to improve legibility and to ensure the document is up-to-date. The Authority determined that these proposed changes are sufficiently minor so as not to require further consultation or require additional Sustainability Appraisal/Appropriate Assessment work.

Appendix 1 – Legal Compliance

Stage 1: Inception

Activity	Evidence provided
<p>1. Is the development plan document identified in the adopted local development scheme and have you recorded the timetable for its production?</p>	<p>The Authority's first Local Development Scheme was published in April 2005 and identified the Authority's intention to produce a separate Development Control Policies Document from the Core Strategy. The Local Development Scheme (2005) identified the following milestones:</p> <ul style="list-style-type: none"> • Commencement on preparation May 2005 • Consultation on Preferred Options October 2006 • Submission March 2007 • Adoption March 2008 <p>The 2008 LDS identified that the timescale for the Preferred Options had slipped to December 2007 due to the complexities of the Core Strategy Examination and the need to resolve flood risk issues through the preparation of a Development and Flood Risk SPD following the publication of PPS25 in December 2006. Publication was anticipated to take place in January 2009 although this did not take place as the two key members of Staff working on the document left the Authority in September and November 2008 respectively. Both were not replaced until March 2009. The most recent LDS adopted in March 2010 highlighted the need to undertake consultation on a revised set of Preferred Options due to the time lapse that had taken place and the need to resolve issues relating to flood risk and residential boating. The LDS 2010 contained the following milestones:</p> <ul style="list-style-type: none"> • Revised Preferred Options June 2010 • Publication October 2010 • Submission December 2010 <p>Publication took place in December 2010 with an extended consultation period to allow for festive holidays and office closures. Progress against Local Development Scheme Milestones was recorded in the Authority's Annual Monitoring Reports</p>

Activity	Evidence provided
	See 2005, 2008 and 2010 LDSs and AMRs of 05/06, 06/07, 07/08, 08/09, 09/10.
2. Have you considered how community engagement will be programmed into the preparation of the development plan document?	<p>The Broads Authority has a SCI which sets out the standards for consultations. This has formed the basis for the consultation process along with that set out in the amended Regulations. Consultation on key issues to be addressed in the DPD began in 2006, followed by Issues and Options consultation in June-August 2007. Information was placed in the annual visitor magazine Broadcaster which has a circulation of 110,000, included in the annual toll-payers questionnaire and a consultation leaflet produced which was distributed to a number of public venues.</p> <p>The consultation periods are timetabled in the Consultation Statements</p> <p>See SCI, LDS and Consultation Statement.</p>
3. Have you considered the appropriate bodies you should consult?	<p>Appendix 1 of the SCI lists the statutory consultees, government departments and additional bodies who should be consulted throughout the process.</p> <p>At this inception stage the SA Scoping Report was sent to all the necessary bodies (see Q6)</p> <p>.</p> <p>See SCI and Consultation Statement</p>
4. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?	<p>Appendix B of the Sustainability Appraisal Scoping Report (which was published in March 2007) sets out the baseline data that was collected and from which sources. This information along with data from the Annual Monitoring supplements the growing evidence base behind this DPD.</p> <p>The evidence base will need to be kept up to date and as such the SA baseline information has been reviewed during the process of producing the plan.</p> <p>See SA Scoping Report</p>
5. Is baseline information being collected and evidence being gathered to set the framework for the sustainability appraisal?	<p>The Sustainability Appraisal Scoping Report was published in March 2007. It scopes relevant plans and programmes, identifies the issues that the DMPDPD should address and assesses the economic, social and environmental characteristics of the area and changes in these characteristics. Appendix B of that Report sets out the baseline data collected to set the framework for the Sustainability Appraisal.</p> <p>See SA Scoping Report</p>

Activity	Evidence provided
6. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the sustainability appraisal report?	<p>The Scoping Report was distributed to the three statutory bodies (Natural England, English Heritage and the Environment Agency). In addition it was sent to other bodies including neighbouring authorities and the Royal Society for the Protection of Birds. The document was available on the Internet for public viewing. The consultation took part between 16th March 2007 and 25th April 2007.</p> <p>A number of responses were received (from the three statutory consultees, the RSPB, and Norfolk County Council), and the necessary revisions were made to the final version of the Scoping Report in August 2007</p> <p>See Scoping Report August 2007.</p>

Stage 2: Plan preparation - frontloading phase (Issues and Options)

Activity	Evidence provided
1. Have you notified the specific consultation bodies that have an interest in the subject of the development plan document and invited them to make representations about its contents?	<p>The Issues and Options report was made available for a six week period of consultation from 29 June to 10 August 2007. The report and/or notification of its publication was sent to all consultees on the LDF database and made available at a number of locations in the Broads including visitor information centres, local libraries and constituent council head offices. The report was also published on the Authority's website and on the Norfolk wide "Consultation finder" website.</p> <p>As such all specific consultation bodies set out in the regulations have been invited to make representations.</p> <p>See SCI, Issues and Options report, Consultation Statement</p>
2. Have you notified the general consultation bodies that you consider have an interest in the subject of the development plan document and invited them to make representations	<p>The Issues and Options report was made available for a six week period of consultation from 29 June to 10 August 2007. The report and/or notification of its publication was sent to all consultees on the LDF database and made available at a number of locations in the Broads including visitor information centres, local libraries and constituent Council head offices. The report was also published on the Authority's website and on the Norfolk wide "Consultation Finder"</p>

Activity	Evidence provided
about its contents?	<p>As such all general consultation bodies set out in the regulations have been invited to make representations.</p> <p>See SCI, Issues and Options report, Consultation Statement</p>
3. Are you inviting representations from people resident or carrying out business in your area about the content of the development plan document?	<p>Consultation on key issues to be addressed in the DPD began in 2006 with public displays at events in the Broads in July and August. Information was on the website and in the annual visitor magazine "Broadcaster". A scoping leaflet/questionnaire was distributed to all consultees on the LDF website including Parish Council and community groups. A total of 107 people responded to the scoping leaflet.</p> <p>See Consultation Statement</p>
4. Are you engaging with stakeholders responsible for delivery of the strategy?	<p>A range of statutory bodies, stakeholders, key local, district and county wide organisations and individuals were invited to engage at the Regulation 25 consultation stage. These stakeholders have been involved in and will continue to be involved at each stage.</p> <p>See Consultation Statement</p>
5. Are you taking into account representations made?	<p>A report was produced following the Issues and Options consultation summarising the responses and feedback from the stakeholder workshops. The comments were taken into consideration when working up the Preferred Options. This work helped the Authority determine a preferred policy direction on a number of key policy areas e.g. flood risk.</p> <p>See Consultation Statement and Planning Committee Report 9th November 2006.</p>
6. Does the consultation contribute to the development and sustainability appraisal of alternatives?	<p>The choices made for the Preferred policy options were informed by the consultation responses and the ongoing, sustainability appraisal process and its assessment outputs. SA is an iterative process and as it has been updated and audited, revisions have been placed on the website.</p> <p>See Consultation Statements and draft Preferred Options report which sets out how the Sustainability Appraisal and public consultation were taken into consideration in the development of the options and policies.</p>
7. Is the participation:	<p>At each stage the consultation arrangements have been led by the content of the SCI.</p>

Activity	Evidence provided
<ul style="list-style-type: none"> • following the principles set out in your statement of community involvement • integrating involvement with the sustainable community strategy • proportionate to the scale of issues involved in the development plan document? 	<p>The consultation process has been proportionate to the scale of issues involved. The Issues and Options consultation commenced with leaflets and public. All neighbouring authorities and parishes were consulted. The Authority has responsibility to produce a Management Plan for the Broads – the Broads Plan. The existing plan was adopted in 2004 and influenced the development of the Core Strategy Adopted in 2007. The Broads Plan Review commenced in 2009 and the work undertaken on that review has fed into the evolution of the Development Management Policies. The Broads Plan performs a similar function to that of a Sustainable Community Strategy in that it provides the strategic direction for the Management of the Broads as a whole.</p> <p>See SCI, Broads Plan 2004 and Consultation Draft Broads Plan June 2010 , Schedule of Responses to Consultation on draft Broads Plan and 2nd draft Broads Plan February 2011</p>
<p>8. Are you keeping a record of:</p> <ul style="list-style-type: none"> • the individuals or bodies invited to make representations • How this was done • The main issues raised? 	<p>A report summarising the responses to the Issues and Options consultation was prepared and presented to Members on 9th November 2006, setting out the draft policy preferred options for the DPD. The issue of flood risk was identified as the major issue and a further report was taken to Members to gain approval to publish for consultation the Preferred Options for this DPD and the Development and Flood Risk SPD.</p> <p>See committee report of 9th November 2006 and Consultation Statement</p>
<p>9. Are you developing a framework for monitoring the effects of the development plan document?</p>	<p>An initial table which identifies the Core Output Indicators and Local indicators was drawn up as part of the Preferred Options document. This still needed to be reviewed and worked up further for later stages of the DPD.</p> <p>See Preferred Options DMP DPD 2007/8</p>
<p>10. Have you arranged to send copies of documents used in consultation to the Government Office and Planning Inspectorate?</p>	<p>Go-East and PINS were sent a letter at each stage of the consultation and supplied with the necessary documentation in electronic and hard copy.</p> <p>See specific PINS and Go-East letters</p>

Stage 3: Plan preparation - formulation phase (Preferred Options 2007 and Further Consultation on Preferred Options 2010)

Activity	Evidence provided
<p>1. Are you preparing reasonable alternatives for evaluation during the preparation of the development plan document?</p>	<p>The choices made for the Preferred policy options were informed by the consultation responses and the ongoing, sustainability appraisal process</p> <p>See Consultation Statements and draft preferred options report which sets out how the sustainability appraisal and public consultation were taken into consideration in the development of the options and policies.</p>
<p>2. Have you assessed alternatives against:</p> <ul style="list-style-type: none"> • consistency with national policy • general conformity with the regional spatial strategy? 	<p>In formulating a suite of policy options for development management policies, consistency with the Adopted Core Strategy has been an important consideration.</p> <p>At the Issues and Options stage EERA responded to say that the document does not give rise to any conformity issues with the Regional Spatial Strategy.</p> <p>Go-East and EERA were consulted at all stages of the plan's evolution.</p>
<p>3. Are you having regard to:</p> <ul style="list-style-type: none"> • adjoining regional spatial strategies, the spatial development strategy for London, or Welsh Spatial Plan (as appropriate) • the National Planning Framework for Scotland? 	<p>Not applicable.</p>

Activity	Evidence provided
<p>4. Are you having regard to:</p> <ul style="list-style-type: none"> • the sustainable community strategy of the authority or other authorities whose area comprises part of the area of the council • any other local development documents adopted by the council? 	<p>The Sustainable Community Strategies for Broadland, North Norfolk, Norwich, Great Yarmouth South Norfolk and Waveney together with the County Strategic Partnerships for Norfolk and Suffolk lead the communities' own local aspirations and gave some context for this DPD and was scoped as part of the Sustainability Appraisal work. Local Strategic Partnerships have been consulted at each stage of DPD preparation and have attended stakeholder workshops.</p> <p>The Authority has responsibility to produce a Management Plan for the Broads – the Broads Plan. The existing plan was adopted in 2004 and influenced the development of the Core Strategy adopted in 2007. The Broads Plan Review commenced in 2009 and the work undertaken on that review has fed into the evolution of the Development Management Policies. The Broads Plan performs a similar function to that of a Sustainable Community Strategy in that it provides the Strategic direction for the Management of the Broads as a whole.</p> <p>In addition the Core Strategy was Adopted by the Authority in 2007 and therefore care has been taken to ensure that the development of this DPD is consistent with the Core Strategy. The Preferred Options document published in December 2007 clearly highlighted throughout which Core Strategy Policies were being implemented by which Development Management Preferred Policy Options, for clarity</p> <p>See Preferred Options 2007 and Sustainability Appraisal.</p>

Activity	Evidence provided
<p>5. Do you have regard to other matters and strategies relating to:</p> <ul style="list-style-type: none"> • resources • the regional development agencies' regional economic strategy • the local transport plan and transport facilities and services • waste strategies • hazardous substances and accidents? 	<p>With regard to transport and minerals issues, the county councils have been consulted at each stage of DPD preparation and have attended stakeholder workshops.</p> <p>RES- EEDA has been involved in the consultation process although this has been relatively limited.</p> <p>All hazardous zones have been avoided. This DPD is not site specific with detailed locations for any new development to be considered in greater detail at a later stage. The Health and Safety Executive did not provide a response to the consultation.</p> <p>Assessment is also being undertaken to assess the likely significant effects on habitats.</p> <p>Also see SA Scoping Report.</p>
<p>6. Are you having regard to the need to include policies on mitigating and adapting to climate change?</p>	<p>Climate change is a thread running through the plan and is a key issue identified in the Core Strategy and in the emerging Broads Plan 2011. It is identified in the vision, objectives and environmental/sustainability policies. Policies on climate change have been changed and strengthened during editing following consultation.</p> <p>Policies relating to flood risk have evolved considerably through the process in a response to climate change issues such as sea level rise. Policies in the DPD, and the Environment chapter of the Issues and Options document considered climate change and reducing environmental impact.</p> <p>See Issues and Options Document and SA Scoping Report</p>
<p>7. Have you undertaken the necessary sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?</p>	<p>As part of the development of the 'options' in the Issues and Options consultation the emerging policy options and suggested alternatives were appraised using the appraisal assessment matrix brought forward through the SA Scoping Report, which was the subject of consultation. Further Sustainability Appraisal was carried out to accompany the preferred policy options.</p> <p>.</p>

Activity	Evidence provided
<p>8. Are you setting out clear reasons for any preferences between alternatives?</p>	<p>The choice of options was made having considered all of the evidence and the consultation responses.</p> <p>The Preferred Options document contains a clear preferred option for each policy area together with a commentary on the choice of options where alternatives are explored and reasons given for them being discounted.</p> <p>See Preferred Options Report 2007</p>
<p>9. Have you taken into account any representations made on the content of the development plan document and the sustainability appraisal?</p> <p>10. Are you keeping a record?</p>	<p>Individual responses from all phases of consultation are recorded on the Consultation database and a summary report produced and reported to Members. .Analysis of each representation is included within that report together with any suggested recommendations for change or amendment to policy. This gives a clear trail of why and how changes to policy have been made. The DPD incorporates changes where practicable. The recommendations from the SA are also incorporated where practicable.</p> <p>Comments received are given full consideration in finalising the strategy. Individual responses are provided for each representation and there will be an overall consultation report which will show how the representations have helped formulate the plan.</p> <p>See Consultation Statement</p>
<p>11. Where sites are to be identified or areas for the application of policy in the development plan document, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> • enable you to amend the currently adopted proposals map • inform the community about the location of proposals? 	<p>The Development Management policies apply across the Executive area and are not site specific. Therefore it has not been considered necessary to produce a proposals map at this stage. The Site Specific Policies DPD will address site specific issue and will provide this visual representation, and be accompanied by the Proposals Map.</p>

Activity	Evidence provided
12. Are the participation arrangements compliant with the statement of community involvement?	<p>The consultations were compliant with the SCI.</p> <p>See the Consultation Statement.</p>
13. Have you remained in close contact with the Government Office and discussed any emerging issues that might affect the soundness of the development plan document?	<p>Close contact with Go-East has been maintained through direct liaison with the Norfolk and Suffolk Representative and through the Norfolk Planning Officers Group which is attended by Go-East representatives.</p>

Stage 4: Publication (December 2010)

Activity	Evidence provided
<p>1. Have you prepared the sustainability appraisal report?</p>	<p>Yes. A revised Sustainability Appraisal Report was prepared and published at the same time as the Publication Version of the DPD</p> <p>See Sustainability Appraisal Report 2010</p>
<p>2. Have you made clear where and within what period representations must be made?</p>	<p>Yes. Representations could be made between 13th December 2010 and 28th January 2011. An allowance of additional time was made to account for office closures over the Christmas and New Year Period. Details of the consultation period and where representations could be made were given on the Authority website, in the statement of representations procedure, the public notice and the consultation letters.</p>
<p>3. Have you made copies of the following available for inspection:</p> <ul style="list-style-type: none"> • the proposed submission documents? • the statement of the representations procedure? 	<p>Yes. The proposed submission documents and statement of representations procedures were made available for inspection at Broadland, Norwich, North Norfolk, South Norfolk, Great Yarmouth and Waveney Council offices plus a number of local libraries as listed in the DPD. consultation period. The statement of representation procedure, public notices, letters sent to consultees and the website set out where and when documents could be viewed.</p> <p>See Proposed Submission DPD 2010 and Consultation Statement</p>
<p>4. Have you published on your website the following:</p> <ul style="list-style-type: none"> • the proposed submission documents? • the statement of the representations procedure? • statement and details of where and when documents can be inspected? 	<p>Yes. The proposed submission documents, statement of representation procedure and details of where and when documents could be inspected were available on the website.</p>

Activity	Evidence provided
<p>5. Have you sent to each of the specific consultation bodies invited to make representations under Regulation 25(1):</p> <ul style="list-style-type: none"> • A copy of each of the proposed submission documents • The statement of the representations procedure? 	<p>The specific consultation bodies were all sent a hard copy of the DPD, the Consultation Statement (Regulation 30(1)(d), copies of the Sustainability Appraisal, the Appropriate Assessment and the Landscape Guidance for Selected Locations in the Broads. Details were given as to where hard copies could be obtained from or viewed.</p>
<p>6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 25(1):</p> <ul style="list-style-type: none"> • the statement of the representations procedure? • where and when the documents can be inspected? 	<p>All of the general consultation bodies were sent a letter and statement of representation procedure. Details were given as to where and when the documents could be inspected or obtained from.</p>
<p>7. Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> • the statement of the representations procedure • where and when the documents can be inspected? 	<p>Public notices were placed in the following newspaper on the following dates: Eastern Daily Press – 8th December 2010</p> <p>The public notice set out the statement of representation procedure and details of where and when the documents could be inspected.</p>

Activity	Evidence provided
8. Have you requested the opinion of the regional planning body the general conformity of the development plan document with the regional spatial strategy?	In December 2010 there was still some uncertainty as to the status of the Regional Spatial Strategy following various Government announcements and the outcome of High Court proceedings. There was no identifiable contact at EERA and therefore Go-East were contacted who confirmed that this requirement had been superseded by the Local Democracy, Economic Development and Construction Act 2010.

Stage 5: Submission – (March 2011)

Question	Evidence provided
<p>1 Are you ready to submit the DPD?</p> <p>2 Are there any major issues revealed by the representations on publication?</p> <p>3 Are all the relevant documents in place?</p>	<p>The DPD is ready for submission</p> <p>The representations on publication did reveal a concern in respect of the Habitats Regulations Assessment by the RSPB that had not been previously raised. However subsequent dialogue has resolved this issue. No other major concerns have been revealed by representations on publication.</p> <p>Copies of all relevant documents will be available at the head offices of Broadland District Council, Norwich City Council, North Norfolk District Council, Great Yarmouth Borough Council, South Norfolk District Council and Waveney District Council</p>
<p>4 Has the development plan document been prepared in accordance with the local development scheme?</p> <p>5 Does the development plan document's listing and description in the local development scheme match the document?</p> <p>6 Have the timescales set out in the local development scheme been met?</p>	<p>The DPD is consistent with the proposed purpose of the document as set out in the LDS.¹</p> <p>This DPD provides generic policies that apply across the whole of the Broads. These policies will help guide and promote development, and inform the determination of applications for planning permission. The timetable has been delayed from the original set out in the LDS 2005 due to changes in the regulations in 2008 and the loss of key staff between Autumn 2008 and Spring 2009. The most recent timetable as set out in the LDS 2010, timetables publication for September 2010 and submission for December 2010. Publication took place in November 2010 due to the need for the publication to be agreed by the Full Authority that met on 19 November 2010 and due to long term staff sickness in Summer 2010.</p>

¹ **Note on Revocation of the Regional Spatial Strategy**

References to the East of England Plan / RSS reflect the legal requirements at the relevant stage in the strategy's preparation.

Question	Evidence provided
7 Has the development plan document had regard to any sustainable community strategy for its area (like a county and district)?	Yes. The Sustainable Community Strategies for Broadland, Norwich, North Norfolk, Great Yarmouth, South Norfolk and Waveney together with Norfolk and Suffolk County lead the communities' own aspirations and provided a context for the DPD. These have also helped inform the Sustainability Appraisal. The Broads Plan 2004 and the Broads Plan review that has taken place between 2009 and 2011 has also influenced the development of the DPD.
8 Is the development plan document in compliance with the statement of community involvement (where one exists)? 9 Has the council carried out consultation as described in the statement of community involvement?	<p>Yes, the DPD is compliant with the SCI in 2006 and the first revision adopted in 2008.</p> <p>The submission consultation on soundness and subsequent stages are in line with the revised requirements of PPS12 and The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. The consultation process has followed the requirements set out in the SCI for informing, participating and consulting.</p> <p>See the Consultation Statement</p>
10 Has the development plan document been subject to sustainability appraisal? 11 Has the council provided a final report of the findings of the appraisal?	<p>Sustainability Appraisal has been integral in the preparation of the DPD. Scoping of documents and evidence collected in the early stages of the SA informed the Issues and Options stage.</p> <p>All policy options have been subject to SA. This process helped assess the possible environmental, economic and social impacts and helped work up the policies.</p> <p>SA indicators, along with AMR indicators, will be used to monitor the progress of the plan. The primary indicators to be monitored are set out in the proposed submission document.</p>
12 Is the development plan document to be submitted consistent with national policy?	The plan is generally consistent with national policy.

Question	Evidence provided
<p>13 Does the development plan document contain any policies or proposals that are not in general conformity with the regional spatial strategy?</p> <p>14 If yes, is there local justification?</p> <p>15 Has the council got confirmation from the regional planning body about the general conformity of the plan with the regional spatial strategy?</p>	<p>All policies and proposals comply with RSS requirements insofar as they are relevant to this DPD.</p> <p>This requirement has been superseded. However when relevant it was indicated by EERA that the emerging DPD was in general conformity.</p>
<p>16 Does the development plan document comply with the 2004 regulations (as amended)?</p> <p>17 Specifically, has the council published the prescribed documents, and made them available at their principal offices and their website?</p> <p>18 Has the council placed local advertisements?</p> <p>19 Has the council notified the development plan document bodies?</p> <p>20 Does the development plan document contain a list of superseded saved policies?</p>	<p>Yes</p> <p>Yes. The submission documents were made available at, Broadland, Norwich, North Norfolk, Great Yarmouth, South Norfolk and Waveney Council Offices, and the Broads Authority Office. The documents were made available on the website</p> <p>Yes. Notices were placed in the EDP, and the East Anglian Daily Times on submission</p> <p>Yes. The DPD bodies were notified on submission</p> <p>Appendix A of the submission DPD lists the superseded/saved policies.</p>

Question	Evidence provided
<p>21 Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted proposals map?</p> <p>22 If yes, have you prepared a submission proposals map?</p>	<p>Not Applicable.</p>
<p>23 If the development plan document is not a core strategy, is it in conformity with the core strategy?</p>	<p>Yes. The DPD is in conformity with the Adopted Core Strategy. Clear links between Core Strategy policies and DMDPD policies are made in Table 1 of the Submission DPD</p> <p>See Submission DPD</p>
<p>24. Have you prepared a statement setting out:</p> <ul style="list-style-type: none"> • Which bodies and persons were invited to make representations under Regulation 25 • How they were invited • A summary of the main issues raised • How the representations have been taken into account? 	<p>A Statement of Consultation was prepared at Proposed Submission (publication) Stage and updated to accompany Submission and comply with Regulations 30 (1) (d) and 30 (1) (e), respectively.</p>

Question	Evidence provided
<p>25. Have you prepared a statement giving:</p> <ul style="list-style-type: none"> • the number of representations made under Regulation 28(2) • a summary of the main issues raised <p>OR</p> <ul style="list-style-type: none"> • that no representations were made? 	<p>Yes</p>
<p>26 Have you collected together all the representations made under Regulation 28?</p>	<p>Yes</p>
<p>27 Have you assembled the relevant supporting documents?</p>	<p>Yes</p>
<p>28 Has your council approved the development plan document for submission?</p>	<p>Yes: Broads Authority meeting – 19th November 2010 and 18th March 2011</p>
<p>29 Have you sent the Secretary of State (the Planning Inspectorate) a paper copy of the following:</p> <ul style="list-style-type: none"> • the development plan document? • the submission proposals map (unless there are no site allocation policies)? • the documents prescribed in Regulation 30(1)? 	<p>Yes. The DPD document submission proposals maps and the documents prescribed in Regulation 30(1) were submitted to the Planning Inspectorate on submission.</p>

Question	Evidence provided
<p>30 Have you sent the Secretary of State (the Planning Inspectorate) an electronic copy of the:</p> <ul style="list-style-type: none"> • development plan document? • submission proposals map (unless there are no site allocation policies)? • documents prescribed in Regulation 30(1)? 	<p>Yes. Electronic documents outlined above were submitted to the Planning Inspectorate on submission</p>
<p>31. Have you made the following available at the same places where the proposed submission documents were to be seen:</p> <ul style="list-style-type: none"> • The development plan document? • The documents prescribed in Regulation 30(1)? 	<p>Yes. The submission documents were made available at Broadland, Norwich, North Norfolk, G Great Yarmouth, South Norfolk and Waveney Council Offices, and the Broads Authority Office. The documents were made available on the website</p>

Question	Evidence provided
<p>32 On your website, have you published the:</p> <ul style="list-style-type: none"> • development plan document • submission proposals map • sustainability appraisal report • Regulation 30(1)(d) statement • Regulation 30(1)(e) statement • supporting documents (where practicable) • representations made under Regulation 28 (where practicable) • statement as to where and when the development plan document and the documents are available? 	<p>Yes.</p>

Question	Evidence provided
<p>33 For each specific consultation body invited to make representations under Regulation 25(1), have you sent the:</p> <ul style="list-style-type: none"> • development plan document • submission proposals map • sustainability appraisal report • adopted statement of community involvement • Regulation 30(1)(d) statement • Regulation 30(1)(e) statement • supporting documents you consider relevant to each body • statement as to where and when the development plan document and the documents are available? 	<p>Yes. On submission, Specific bodies were sent a letter, list of submitted documents, weblinks and were invited to request hard copies.</p>
<p>34 For each general consultation body invited to make representations under Regulation 25(1), have you sent:</p> <ul style="list-style-type: none"> • notification that the documents prescribed in Regulation 30(1) are available for inspection • where and when they can be inspected? 	<p>Yes. General consultation bodies were sent a letter on submission</p>

Question	Evidence provided
<p>35 Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> • the title of the development plan document? • the subject and area covered by the development plan document? • notification that the documents prescribed in Regulation 30(1) are available for inspection • where and when they can be inspected? 	<p>Yes, on submission: Eastern Daily Press and East Anglian Daily Times</p>
<p>36 Have you given notice to persons who have requested to be notified that submission has taken place?</p>	<p>Yes, on submission</p>

Question	Evidence provided
<p>37 If an examination is being held, at least six weeks before its opening has the Programme Officer:</p> <ul style="list-style-type: none"> • published the time and place of the examination and the name of the person appointed to carry out the examination on your website • notified those who have made representations on the published development plan document which have not been withdrawn of these details • advertised these details? 	<p>To be confirmed</p>

Question	Evidence provided
<p>Additional – Schedule of Proposed Minor (Post-Publication) Changes</p>	<p>Following Pre-submission (publication) consultation (December 2010 –January 2011), the Authority determined that it was appropriate to prepare a schedule of proposed minor changes, to improve legibility and to ensure the document is up-to-date. The Authority determined that these proposed changes are sufficiently minor so as not to require further consultation or require additional Sustainability Appraisal/Appropriate Assessment work.</p>

Appendix 2 - Soundness

Key question	Evidence provided
Justified	
Participation	
1. Has the consultation process allowed for effective engagement of all interested parties?	<p>Yes, the consultation process has followed the requirements of PPS12 and the regulations (as amended) and the SCI and has been proportionate to the scale of issues involved. However a number of policies have been significantly revised since the Regulation 25 public consultation in light of responses from the consultation. These include policies on floodrisk, residential boating and developer contributions.</p> <p>For further detail see Consultation Statements and SCI</p>
Research/ fact finding	
2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?	<p>Yes – the DPD builds on the evidence compiled to support the Adopted Core Strategy (2007). Very little additional specific evidence studies have had to be commissioned for this particular DPD.</p> <p>The main new piece of evidence is the completion of the Landscape Character Assessment Work which was completed in 2010 and had been the subject of public consultation in its own right.</p>
5. What assumptions had to be made in preparing the development plan document? 6. Are the assumptions reasonable and justified?	<p>There were few assumptions because of the direction given by the Core Strategy 2007. The evidence itself is based on assumptions that will be tested through implementation and monitoring.</p>
Alternatives	

Key question	Evidence provided
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>The policy options chosen are considered appropriate given the reasonable alternatives and the wealth of landscape and nature conservation designations in the Broads area.</p> <p>Alternatives have been considered where reasonable and clear reasons given at each stage of DPD preparation as to reasons for discounting alternative options.</p> <p>The consultation reports, minutes from meetings identify how and why decisions were made.</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>Yes. SA has informed the plan making process from the earliest stage, with the collection of baseline information and the scoping of relevant strategies and plans informing the content of the Issues and Options document.</p> <p>As part of the development of the 'options' in the Issues and Options consultation document the emerging policy options and suggested alternatives were appraised using the appraisal assessment matrix brought forward through the SA Scoping Report.</p>

Key question	Evidence provided
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>The DPD is in conformity with the Core Strategy which in turn is consistent with the RSS. Where appropriate, it does expand upon regional guidance.</p> <p>Yes.</p>

Effective	
Deliverable	
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<p>The spatial vision and objectives clearly identify what issues the Core Strategy sought to address. Section 2 of the Submission DPD sets out how this is translated in to the DMDPD..</p> <p>The Sustainability Appraisal Scoping Report identifies the sustainability issues to be considered when producing the DPD.</p> <p>The Issues and Options Report on Consultation sets out the main issues raised by the community and other stakeholders at each stage</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>.All neighbouring authorities have been consulted on the document and the Sustainability Appraisal.</p>
<p>16. Does the development plan document contain clear objectives?</p>	<p>Yes. The DPD contains clear objectives which have derived from the Core Strategy. They have evolved over time following SA.</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>Yes. The objectives are specific to the area.</p> <p>The vision and objectives show how the spatial planning elements of the Sustainable Community Strategies can be achieved.</p>

<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>There are clear links between the Sustainable Community Strategies and the objectives and each policy sets out which objectives it meets. The monitoring framework shows how Local Area Agreement (LAA) targets (and other targets) will be monitored.</p> <p>There are no obvious gaps in the policies with regard to the objectives.</p>
<p>21. Are there realistic timescales related to the objectives?</p>	<p>Table 2 of the DPD contains the implementation framework which sets out the policies, indicators and responsible bodies for implementing the DPD.</p>
<p>22. Are the policies internally consistent?</p>	<p>Policies are internally consistent with each other seeking a balance between economic development and the environment.</p>
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>The DPD does not contain material which is in another plan. The other criteria are met.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<p>Table 2 of the DPD contains the implementation framework which sets out the policies, indicators and responsible bodies for implementing the DPD.</p>

<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>The policies of this DMP DPD support the strategy and objectives</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p>The delivery of this DPD is not dependent on the delivery of much infrastructure.</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<p>Yes.</p>
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<p>This DPD is not particularly dependent on the delivery of critical infrastructure.</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document? 30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<p>Table 2 of the DPD contains the implementation framework which sets out the policies, indicators and responsible bodies for implementing the DPD,</p> <p>Service providers have been engaged in the production of the plan; however the DPD is not dependent wholly on their delivery.</p>

<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>Yes- insofar as it is possible for a generic development management policy document to do so. It builds on the Core Strategy vision and policies.</p> <p>There was a dialogue with LSPs and service providers</p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<p>There are few of these. Issues such as flood risk and effects on protected species or habitats have largely been resolved.</p>
<p>Flexible</p>	
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>Yes</p> <p>The DPD is not reliant or dependent upon RSS growth or housing figures nor is its delivery critical to the delivery of infrastructure to support housing or other growth.</p>

35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy? ²	Yes. Not specific to this DPD.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	The plan will be reviewed in the event of a serious policy failure.
Monitoring	
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	See Table 2 of the Submission Document for implementation and monitoring frameworks.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	The monitoring framework sets out the indicator, agencies, target and source. The indicators will be reported through the Annual Monitoring Report.

² **Note on Revocation of the Regional Spatial Strategy**

There are a number of references to the East of England Plan / RSS as a factor guiding the strategy. Following the decision to revoke the RSS through the Localism Bill, the strategy is still considered to be sound based on national guidance and legislative requirements.

A number of minor textual amendments are proposed to update references to the RSS.

<p>39. Are suitable targets and indicators present (by when, how and by whom)?</p>	<p>The monitoring framework sets out the indicators, agencies, target and source.</p>
<p>National policy</p>	
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<p>The plan is generally consistent with national policies and the Adopted Core Strategy</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<p>No. The plan follows national guidance and applies it locally.</p>