

Local Plan – August Bite Size Piece
Report by Planning Policy Officer

Summary:	This report introduces the following topics for the Publication version of the Local Plan: Local Development Scheme, Consultation Plan, Housing Section and Duty to Cooperate Statement.
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Recommendation:	Members' views are requested.
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1 Introduction

- 1.1 This report introduces the following topics for the Publication version of the Local Plan: Local Development Scheme, Consultation Plan, Housing Section and Duty to Cooperate Statement.
- 1.2 Members' views are requested to inform the draft policy approach in the Publication version of the Local plan.
- 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.

2 Topics covered in this report:

- a) Local Development Scheme. This is the timeline for producing the Local Plan. This is the fourth version of the LDS for this Local Plan. It is a requirement when producing Local Plans that this is kept up to date.
- b) Consultation Plan. This sets out how the next consultation stage of the Local Plan will be undertaken. This stage is more formal than the previous stages and as such we have produced a representations form and also guidance.
- c) Housing Section. This is updated following the new SHMA that was discussed at the last Planning Committee meeting as well as to include new policies. Note that there will be a section in the final Local Plan relating to the evidence we are yet to receive about Gypsy, Travellers, Travelling Show People, Caravans and Houseboats.
- d) Duty to Cooperate Statement. This sets out how we have cooperated during the production of the Local Plan. This also sets out how the Local Plan meets the requirements of the draft Norfolk Strategic Framework. Please note that the NSF is out for consultation from around 4 August 2017 and a report on that will come to the next Planning Committee.

3 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.

Background papers:None

Author: Natalie Beal
Date of report: 2 August 2017

Appendices:

- Appendix A – Local Development Scheme
- Appendix B – Consultation Plan
- Appendix C – Housing Section
- Appendix D – Duty to Cooperate Statement.

APPENDIX A

Broads Local Plan Local Development Scheme - Version 4 - August 2017

		Completed?	Aug-14	Sep-14	Oct-14	Nov-14
SCI	Production	✓				
	Consultation (4 weeks)	✓				
	Refinement and Adoption.	✓				

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APPENDIX B

Broads Local Plan Publication Local Plan. October to November. Consultation Plan

Introduction

The Publication Local Plan is set to publish for public consultation between 4 October to 15 November 2017. The consultation period covers 6 weeks.

Documents to be consulted on

- The Publication 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

- We emailed and wrote to Parish Councils on 4 May 2017 and then on 10 July 2017.

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 November to act as a reminder.

Versions of the Local Plan

- Hard copies at libraries and Council offices. Some documents on DVDs.
- 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 of the 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 of the Broads.
- Venues likely to be Potter Heigham, Loddon and Oulton. Dates and times TBC.

Comments received at this stage of the Local Plan process.

For this stage of the Local Plan, we are introducing a form and related guidance. The comments need to relate to the soundness of the Local Plan and use the tests of soundness accordingly. Please see Appendix A for the form and Appendix B for the Guidance.

Appendix A –Representation Form

Broads Authority Local Plan

Publication version (October 2017)

Representation Form

For Office Use Only
Consultee ID:
Received:
Processed:

Please use this form to make any representations on the Broads Authority Local Plan: Publication version. Completed forms should be returned by email to planningpolicy@broads-authority.gov.uk or by post to: Planning Policy Officer, Broads Authority, Yare House, 62-64 Thorpe Road, Norwich NR1 1RY.

The documents being consulted on, together with a guidance note on making a representation on the Plan, may be found here: www.broads-authority.gov.uk/planning/consultations

This public consultation starts on **xxx** and will last 6 weeks **until xxx** Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination. Responses received after the closing date may not be considered.

Paper copies of this form are available from the Broads Authority's offices in Norwich and at the drop-in events taking place across the Broads. All details are available on our website (see above).

Please note:

- **Separate forms should be completed for each comment made.**
- All respondents **must** provide their personal details.
- Representations should be on the basis of the **soundness** or **legal compliance** of the Plan. (Please see guidance note for more details.)
- It is recommended that groups who share a common view submit a **single form rather than multiple copies** and provide a list of each person supporting the representation.
- By completing this form you agree to your details being shared. Your name, address and comments (but not your other personal details) will be made available for public viewing. **These representations cannot be treated as confidential.**

Please expand the boxes as necessary, or attach additional sheets. Clearly mark any additional sheets with your name and the part of the document the representation relates to.

1.	Your contact details	Agent Details (if applicable)
Name		
Organisation / Group	(if applicable)	
Address line 1		
Address line 2		
Town / City		
County		
Postcode		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes No

5. Do you consider this part of the Plan has met the tests of soundness? *(see guidance note for assistance with this question)*

Yes ☐

No ☐

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☐

If you have answered 'No', please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box

☐

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Local Plan.

Please sign and date this form:

Signature:

Date:

The closing date for responses is xxx

Appendix B – Guidance Note to Accompany Representation Form

Broads Authority Local Plan Publication version (October 2017)

GUIDANCE NOTE

This note is to help you make a formal representation on the Broads Authority Local Plan: Publication version. All representations to this plan must be submitted by **xxx**. A representation form is available on our website (see below).

The Broads Authority wishes to submit the **Broads Authority Local Plan: Publication version** to the Secretary of State for Communities and Local Government for public examination under Section 20 of the Planning and Compulsory Purchase Act 2004. Before we do this, we must get public views on the legal compliance and ‘soundness’ of the Plan. This is an important stage of consultation, as it is the final opportunity for you to comment on the Plan.

We will take account of all representations made on the Publication Plan, and consider appropriate amendments to make sure it is legally compliant and sound. We will then submit the Plan to the Secretary of State early next year. The Public Examination will be held in Norwich, at a date to be agreed by the Planning Inspectorate. At the examination, an independent Inspector will assess whether the Plan complies with the law and is sound.

Where to view the Publication documents

The Broads Local Plan: Publication version, together with supporting documents and a representation form, may be viewed on our website here: www.broads-authority.gov.uk/planning/consultations

Paper copies of the Publication Plan and accompanying proposals map are available to view at selected Council Offices and libraries in the Broads. We are also holding drop-in events, where you can talk to our Planning Officers about the Plan. Details are also on our website.

How to complete the representation form

Questions 1 and 2

Personal information provided as part of a representation **cannot** be treated as confidential, as the Authority is required to make representations available for inspection during the Public Examination. We will also need to use this information to formally notify you regarding the Examination in Public. Data will be processed and held in accordance with the Data Protection Act 1998.

Question 3

You will need to complete a separate form for each comment you are making, stating which part of the Plan your representation relates to.

Question 4

If your representation relates to how the Authority has **prepared** the Local Plan, it is likely to relate to **legal compliance**. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Authority's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the Duty to Co-operate.

The Inspector will check that the Local Plan has been prepared in accordance with the legal and procedural requirements. Please consider the following before making a representation on these requirements:

Local Development Scheme (LDS)

The LDS is a programme of work prepared by the Authority for the production of its Local Plan. The programme should be in the current LDS and key stages should have been followed. Our LDS may be viewed here <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

Statement of Community Involvement (SCI)

The process of community involvement for the Local Plan should be in general accordance with the SCI. Our SCI may be viewed here <http://www.broads-authority.gov.uk/planning/planning-policies/development>

Town and Country Planning (Local Planning) (England) Regulations 2012

The Regulations require that the local planning authority should publish the documents prescribed in the Regulations, and make them available at their principal offices and on their website. It also sets out who the Authority should consult on the preparation of the Plan and when. To view the Regulations, visit: <http://www.legislation.gov.uk/ukxi/2012/767/contents/made>

Sustainability Appraisal (SA) Report

The Authority is required to publish a SA Report when it publishes a Plan. It also prepares an Appropriate Assessment (Habitats Regulations Assessment). Our SA and AA may be viewed here: www.broads-authority.gov.uk/planning/consultations

Duty to Cooperate

The Authority is required to fulfil the Duty to Co-operate in preparing the Plan as required by Section 110 of the Localism Act 2011 and Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Its purpose is to ensure that plans consider planning issues that cross administrative boundaries and issues of concern to agencies with a wider geographical responsibility. The Duty To Cooperate Statement may be found here: www.broads-authority.gov.uk/planning/consultations

Questions 5 and 6

If your representation is on the **content** of the Local Plan, it is likely to relate to its soundness. To be considered **sound**, the Plan must be positively prepared, justified, effective and consistent with national policy as defined in National Planning Policy Framework (NPPF) paragraph 182 (see below).

Positively Prepared

- The Plan should seek to meet objectively assessed development and infrastructure requirements and be consistent with achieving sustainable development.

Justified

- The Plan should be founded on a robust and credible evidence base involving: evidence of participation of the local community and others having an interest in the area; and evidence that the choices made in the Plan are backed up by facts.
- The Plan should provide the most appropriate strategy when considered against reasonable alternatives.
- The Plan should show how its policies and proposals help to ensure that the social, environmental, economic and resource objectives of sustainability will be achieved.

Effective

- The Plan should be deliverable, embracing sound infrastructure delivery planning; having no regulatory or national planning barriers to delivery; delivery partners who are signed up to it; and coherence with the strategies of neighbouring authorities.
- The Plan should be flexible and able to be monitored, and indicate who is to be responsible for making sure that the policies and proposals happen and when.
- The Plan should be flexible to deal with changing circumstances, such as changes in economic circumstances. It should also make clear that major changes may require a formal review of the Plan in the future.

Consistent with national policy

- The Plan should promote sustainable development in accordance national policy.

Question 7

Please state why you consider the Local Plan is either unsound or not legally compliant. Refer to legal and procedural requirements and/or the tests of soundness, as set out above.

Question 9

Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. Your representations should be supported by evidence showing why the Plan should be changed, and why this change will make the Plan legally compliant or sound. It will be helpful to put forward suggested revised wording for any policy or text.

Questions 10 and 11

These questions ask if you wish to be heard by the Inspector at the Public Examination, and to give your reasons why. Please note that the Inspector will make the final decision on who will be invited to participate in individual sessions at the Public Examination.

All representations, whether supporting and opposing the Plan, will be submitted to and examined by the Inspector. If you submit a representation, you are not obliged to attend the Public Examination.

Only people who have made representations in objection to the Local Plan are allowed to speak in the Examination, but are not obliged to do so. This process allows objectors to either rely on their written representation, or to expand on their concerns for the specific issues the Inspector wants to discuss.

Members of the public are able to attend the hearing sessions to observe proceedings, but are not allowed to speak.

More information

If you have any questions about this process, or about the Broads Local Plan, please call Natalie Beal, Planning Policy Officer on 01603 610734 or email our Planning Team at planningpolicy@broads-authority.gov.uk.

1. Housing

Policy PUBSP12: Residential development

a) Meeting the Objectively Assessed Housing Need

The Authority will endeavour to enable housing delivery to meet its objectively assessed housing need throughout the plan period.

The Authority will allocate land in the Local Plan to provide around 146 net new dwellings. To meet the remaining requirement of 44 dwellings to 2036, which falls within that part of the Broads in the Borough of Great Yarmouth, the Authority will work with Great Yarmouth Borough Council to address housing need and the Borough Council will deliver the residual 44 dwellings.

A contribution from housing development towards the provision of affordable housing will be sought.

b) The type of new homes

The size and type of homes for each proposal will be based on up-to date evidence of local needs. A suitable mix will be determined through liaison with housing authorities and rural housing enablers where applicable. The size of dwellings will be commensurate with the latest SHMA.

c) Protecting European Sites

Project Level Habitats Regulation Assessments will be needed to assess implications on sensitive European Sites. Measures to mitigate for the effects of new housing growth may be required.

d) Spatial Strategy

The Authority will direct development to meet the amount of housing as set out in this policy to the following locations:

- i) Development proposals will be located to protect the countryside from inappropriate uses to achieve sustainable patterns of development, by concentrating development in locations with local facilities, high levels of accessibility and where previously developed land is utilised; or
- ii) Brownfield sites at Pegasus in Oulton Broad, Utilities Site in Norwich, sites off Station Road in Hoveton and Hedera House in Thurne and the greenfield site at Stokesby as detailed in the site allocation section of this Local Plan; or
- iii) In relation to windfall, those areas with development boundaries as detailed in policy PODM33; or
- iv) Housing will only be permitted elsewhere where it is necessary, and subsequently retained, in connection with rural enterprises (PODM36), replacement dwellings (PODM38) or to provide affordable housing where local need has been demonstrated in District Councils' or local housing needs surveys.

Reasoned Justification

• Meeting the Objectively Assessed Housing Need

The NPPF states at paragraph 47 '*to boost significantly the supply of housing, local planning authorities should (inter alia) use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period*'.

The Broads Executive Area is part of three separate Housing Market Areas (HMA):

Housing Market Area	Districts in the HMA	Strategic Housing Market Assessment (SHMA) progress
Central Norfolk	North Norfolk, South Norfolk, Norwich, Broadland, Breckland	Completed 2017
Great Yarmouth	Great Yarmouth	Completed 2013
Waveney	Waveney	Completed 2017

As most of the Broads Authority Executive Area is within the Central Norfolk Housing Market Area, the Central Norfolk Strategic Housing Market Assessment¹ calculated the Objectively Assessed Housing Need for the entire Broads Area. The Objectively Assessed Housing Need (OAN) for the Broads is shown in the following table. The Housing Need Topic Paper² gives more detail in relation to the methodology used and the findings of the study. The OAN is for the period 2015 to 2036.

Part of the Broads in...	Objectively Assessed Housing Need	Annual average from 2015 to 2036
Broadland	50	2.63
Great Yarmouth	66	3.47
North Norfolk	70	3.68
Norwich	3	0.16
South Norfolk	40	2.10
Waveney	57	3
Total:	286	13.6

On the issue of meeting the objectively assessed need, the NPPF at Para 47 says Local Planning Authorities should ‘*use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, **as far as is consistent with the policies set out in this Framework**, including identifying key sites which are critical to the delivery of the housing strategy over the plan period*’

It is important to note that The NPPF places great weight on the status of the Broads:

- *Paragraph 14: Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless... specific policies in this Framework indicate development should be restricted.*
- *Footnote 9: For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.*

In deciding how to address housing need, the Authority needs to balance the demands of meeting the needs and protecting the special qualities of the Broads. As such, the housing need for the Broads is met in the following ways:

- Completions and permissions between April 2015 and April 2017

¹ A SHMA is a study which identifies housing need for an area. The 2017 version can be found <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2>

² *Housing Topic Paper, Revised July 2017:* <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2>

APPENDIX C

District	Housing Market Area	Number of dwellings	
		Completions	Permissions
Broadland	Central Norfolk	1	4
North Norfolk	Central Norfolk	0	0
Norwich	Central Norfolk	0	0
South Norfolk	Central Norfolk	52	1
Great Yarmouth	Great Yarmouth	1	1
Waveney	Waveney	1	81
Total		55	87
		142	

ii) Allocations within this Local Plan

Policy	Location	Housing Market Area	Approx. number of dwellings
Policy PUBNOR1: Utilities Site	Norwich	Central Norfolk	120
Policy PUBOUL3: Pegasus Site	Oulton Broad	Waveney	Included in permissions
Policy PUBTHU1: Hedera House	Thurne	Great Yarmouth	16
Policy PUBSTO1: Land at Tiedam	Stokesby	Great Yarmouth	4
Policy POHOV5: Brownfield land off Station Road, Hoveton	Hoveton	Central Norfolk	6
Total			146

iii) Cooperating with Great Yarmouth Borough Council

As the Housing Need Topic Paper shows, the housing need has been exceeded in the Central Norfolk and Waveney Housing Market Areas. However there is a residual need in the Great Yarmouth Housing Market Area for 44 dwellings. Great Yarmouth Borough Council, in their representations to the Issues and Options consultation, stated that they do not consider it appropriate for the Broads to be obliged to meet the housing need in the Great Yarmouth area because of the special qualities of the Broads. They have already included the whole of the Borough, including that part within the Broads, in their assessment of the Borough's housing needs.

The Great Yarmouth Borough area of the Broads Authority is constrained from flood risk and European designated sites. Furthermore there are more sustainable locations, subject to fewer constraints, outside of the Broads Authority Executive Area where it is more prudent to develop land for residential dwellings.

They are keen for the Memorandum of Understanding that has been signed to stay in place, and continue the arrangement that while the Borough will endeavour to meet the whole of its needs outside the Broads, any housing development coming forward in the Broads part of the Borough is counted towards delivery against the Borough's needs. Through the Duty to Cooperate, Great Yarmouth Borough Council will deliver the residual 44 dwellings.

- Affordable Housing

The provision of affordable housing is a key issue in local communities, particularly in rural areas where sites appropriate for development may be limited or may fail to meet sustainability criteria. In the Broads, this is exacerbated by the limited availability of land due to flood risk and the demand for second/holiday homes that inflates land and property prices, and is a disincentive for the provision of lower cost housing.

The requirement for a percentage of properties within a development to be 'affordable' is an established mechanism used by planning authorities to achieve provision of social housing (please refer to the Developer Contributions section of the Local Plan). This mechanism, however, is not easily applied within the Broads, as development is of a small-scale and often individual properties. Larger sites that trigger such a requirement come forward rarely.

Developers are encouraged to use Rural Housing Enablers to carry out Local Housing Needs Surveys where affordable housing contributions for local need will be sought.

- Type

Because the Broads Authority is not the Housing Authority, we will work closely with our districts (who undertake this function) to determine the type of housing that needs to be delivered in a certain area.

- Project level HRA

Project level HRA will need to assess implications for European sites arising from increased recreation pressure and provide adequate green infrastructure – HRAs should be evidence based and draw on available information in relation to standards for dog walking sites (length of walk, facilities etc.).

- Location of development

The policy approach will be to prevent development beyond settlements other than in exceptional circumstances, or which accords with the Authority's statutory purposes. Development within settlements would be permitted only where it meets criteria covering issues such as flood risk, satisfactory provision of infrastructure and design.

If needed, the criteria used to assess settlements in the Settlement Study as well as the criteria relating to access to services and facilities in the HELAA will be used to determine sustainable patterns of development.

In most cases settlements in the Broads straddle the Broads boundary, and the greater part of the settlement lies within the neighbouring local planning authority's jurisdiction. Because of the national protection afforded to the Broads and the vulnerability to flooding of most of the Broads area (the boundary generally follows the edge of the flood plain) it will usually be the case that both the greatest need and greatest opportunity for development in any settlement straddling the boundary will be in that part of it outside the Broads.

The spatial strategy aims to ensure that communities across the Broads Authority Executive Area continue to thrive so that they are economically resilient, environmentally sustainable, socially mixed and inclusive. The Spatial Strategy is the overall framework for guiding development across the Broads Authority Executive Area, determining in what broad locations and settlements different kinds of development will be encouraged or restricted. It offers the most sustainable way to accommodate housing in the Broads as:

- it makes the best use of previously developed land;
- it places new residents in close proximity to jobs, shops, leisure and cultural facilities and public transport nodes, to support sustainable lifestyles; and
- it regenerates some of the more run down areas around the Broads

- Housing Trajectory

The following housing trajectory gives an estimated time line of when various developments could come forward over the plan period. This can be found at Appendix 1.

Policy PUBDM32: Affordable Housing**a) Delivery of affordable housing**

Contributions towards affordable housing provision will be sought in accordance with the full requirements of the adopted standards and policy requirements of the relevant District Council³, including thresholds, level (%) of contribution, house types/mix and tenure and phasing arrangements.

The Authority will only consider reducing the requirement for the proportion of affordable housing on a particular development site, or amending the tenure mix from the relevant District Council's Policy requirement where:

- i) The applicant has submitted a site-specific viability appraisal (which has been assessed independently or by the relevant council as appropriate) has concluded that it is not viable to deliver the full policy requirement of affordable housing and an alternative provision has subsequently been agreed; or
- ii) The applicant has submitted a site specific viability appraisal (which has been assessed independently or by the relevant council as appropriate) has concluded that it is not viable to deliver the required tenure mix and the alternative tenure mix has subsequently been agreed; and
- iii) The resultant affordable housing provision would ensure that the proposed development is considered sustainable in social terms through its delivery of housing mix.

Developments of 6 to 10 dwellings will be required to contribute a commuted sum towards the provision of affordable housing.

b) Provision outside development boundaries (rural exception sites),

Affordable housing developments outside defined development boundaries as defined on the Proposals Map, will be permitted where:

- iv) There is an identified local need for affordable housing;
- v) The need cannot be met within the boundaries of the adjoining local authority's part of the Broads settlement; and
- vi) The location of the proposed development complies with the relevant District Council's criteria for rural exception sites,
- vii) Development will be of a scale that is suitable and appropriate for the size of the site and settlement. Proposals need to avoid over development and reflect the character of the area

A small proportion of the dwellings proposed may be market dwellings if this is fully justified and the market dwellings are the minimum number required to cross subsidise the delivery of the required affordable housing as demonstrated through a site-specific viability assessment to the

³ This is the constituent council – Broadland, Great Yarmouth, North Norfolk, Norwich, South Norfolk, Waveney Council.

satisfaction of the Authority and the relevant Council.

The size (number of bedrooms), type (flat, house) and tenure of affordable homes for each proposal will be based on up-to-date evidence of local housing needs in accordance with the requirements of the relevant Council

c) Planning Obligations

To secure all affordable housing in perpetuity, the Authority will seek a planning obligation from the developer to ensure that:

- viii) The permitted dwellings are affordable in perpetuity by being offered for initial and successive occupation at an affordable or social rent or affordable home ownership;
- ix) The control of occupation of the dwellings is undertaken by a local authority, Registered Provider or other suitable body such as a parish or village trust as approved by the Authority; and
- x) Initial and successive occupation of the permitted dwellings is prioritised for people with strong local connections for all rural exception sites

Reasoned Justification

The NPPG notes that affordable housing need is based on households *“who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market”*.

It is accepted that the Broads Authority defers to the affordable housing policy of our constituent districts as this gives consistency across a district. Furthermore, as the Authority is not the Housing Authority, we work closely with our Districts who do undertake the housing function for our area.

The NPPF definition of affordable housing will apply in implementing this policy.

• Delivering affordable housing in the Broads

Delivery of affordable housing in the Broads will be difficult. There is a limited supply of suitable sites in the Broads for housing to meet local affordable housing need due to the protected landscape of the area, the extent and severity of flood. The high demand for second/holiday homes, which inflates land and property prices and provides a disincentive for the provision of lower cost housing, exacerbates the difficulties in meeting the need for affordable housing in the Broads.

Over the last ten years, applications for dwellings have tended to be in the region of on average 1.94/4.12 dwellings per application⁴ (according to an assessment of the Authority’s planning applications as set out in the Housing Topic Paper). A new Government policy has been introduced that says affordable housing and tariff style contributions should not be sought on sites of 10 units or less, and which have a maximum combined gross floor space of 1,000 square metres. Presuming that the current trend of size of housing applications continues (windfall), it is unlikely that affordable housing will be delivered through windfall schemes.

In relation to seeking commuted sums on 6-10 dwellings, it should be noted that the Broads part of North Norfolk is designated as a rural area and so according to the NPPG Local Planning Authorities can seek planning obligations and affordable housing commuted sum contributions from schemes of that size. The policy however goes further to apply the commuted sums approach to all 6-10

⁴ If all applications are included (including the large scale allocations at Hedera House, Pegasus, Ditchingham Maltings and the Utilities Site) the average number of dwellings per application is: 4.12 dwellings. If the large applications are removed and we focus on windfall (unallocated sites) then the average number of dwellings per application is: 1.94 dwellings.

dwelling sized schemes in the entire Broads area. This is because the opportunities for schemes of 10+ dwelling are very significantly diminished by the rural character of the area and the environmental constraints, however there remains a clear need for affordable housing and all possible reasonable measures should be taken to address the deficiency.

The Authority would use the relevant Council's approach for the calculation of affordable housing contributions and the commuted sum would likely go to the relevance Council to prioritise spend in the parish which generated the commuted sums, then the adjoining parishes and then anywhere in the Council area.

- Assessing viability

The independent review process will require the applicant to submit a development appraisal (to include a prediction of all development costs and revenues for mixed use schemes) to the relevant Authority's/Council's appointed assessor, who will review the submitted viability appraisal and assess the viable amount of affordable housing or the minimum number of market homes needed to cross subsidise the delivery of affordable housing on a rural exceptions site. This review shall be carried out entirely at the applicant's expense. Where little or no affordable housing would be considered viable through the appraisal exercise, the Authority will balance the findings from this against the need for new developments to provide for affordable housing. In negotiating a site-specific provision with the applicant, the Authority will have regard to whether or not the development would be considered sustainable in social terms.

- Information to accompany an application

Developers advancing specific proposals that incorporate an element of affordable housing should submit an affordable housing statement alongside their application. This should provide information on the number of affordable residential units, the mix of affordable units in terms of type, tenure (intermediate/ social or affordable rented) and size (number of bedrooms and gross floor space), and the arrangements for managing the affordable housing units.

This statement is also required to explain and justify the layout and location of the affordable housing element of a scheme. The Authority expects Applicants to liaise with Registered Providers and the Housing Teams of the relevant district council to get advice and recommendations regarding the layout (although the Authority will be the determining body).

- Using planning obligations

To ensure all affordable housing remains affordable to the local community in perpetuity, planning obligations will be sought to ensure that the initial and successive occupation of the dwellings is restricted to people with a housing need. In relation to exception housing sites, the planning obligations will include the requirement that the homes who are prioritised for occupiers with strong local connections as demonstrated by the relevant Council's local connection criteria for such schemes and who need to live in the immediate area. This will include people who need to live in the Broads as a result of their current employment and existing residents needing separate accommodation in the area (for example people in housing need due to sub-standard, overcrowded or otherwise unsuitable accommodation). Please note that Starter Homes will be delivered in line with specific regulations applicable at the time of application.

- Rural exception sites

The applicant will be required to submit evidence showing how the proposed scheme meets local housing need. The Affordable Housing policy states that 'Some of the dwellings proposed may be market dwellings if this is fully justified...' when referring to affordable housing schemes outside of development boundaries. This is in keeping with the NPPF definition for rural exception sites '*small sites used for affordable housing in perpetuity where sites would not normally be used for housing.*

Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding'.

How 'small numbers' is defined will reflect the specifics of the scheme but will be a small proportion of the scheme. Applications need to fully justify the proposed market housing element (the split between market and affordable) of rural exception site schemes via the submission of a site specific viability appraisal as only the minimum number of market homes required to provide the cross subsidy needed to deliver the affordable homes will be permitted. See 'assessing viability' section of the reasoned justification to this policy for more information.

- Offsite provision

Financial contributions in lieu of on-site provision will only be acceptable in exceptional circumstances, where the Authority is satisfied that an element of affordable housing either could not practically be accommodated on site, or if it can be demonstrated that on-site provision would be unviable. In all cases, planning obligations will be sought to ensure an appropriate contribution to affordable housing is secured.

- Starter Homes

According to the Housing and Planning Act (2016)⁵ "starter home" means a building or part of a building that—

- a) is a new dwelling,
- b) is available for purchase by qualifying first-time buyers only,
- c) is to be sold at a discount of at least 20% of the market value,
- d) is to be sold for less than the price cap, and
- e) is subject to any restrictions on sale or letting specified in regulations made by the Secretary of State (for more about regulations under this paragraph, see section 3).

The Act goes on to say that "an English planning authority must carry out its relevant planning functions with a view to promoting the supply of starter homes in England" and "local planning authority in England must have regard to any guidance given by the Secretary of State in carrying out that duty". The Act also defines the various elements to starter homes.

Starter homes will be required in line with national policy and reflecting the relevant Council's policy requirement for such homes.

- Habitats Regulations Assessment

If a proposal is considered in the context of this policy to potentially have an effect on an internationally designated site then it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.

Policy PUBDM33: Residential Development within Defined Development Boundaries
Map xxx.

New residential development will only be permitted within defined development boundaries and must be compatible with other policies of the Development Plan.

⁵ http://www.legislation.gov.uk/ukpga/2016/22/pdfs/ukpga_20160022_en.pdf

Development will be of a scale that is suitable and appropriate for the size of the site and settlement reflect the character of the area.

Development Boundaries are identified on the policies maps for the following settlement areas.

- a) Horning
- b) Oulton Broad
- c) Thorpe St Andrew
- d) Wroxham and Hoveton

Constraints and features

a) Horning

Flood risk (zones 1, 2 & 3 by EA mapping).

Conservation area.

Listed buildings.

Just across river from SAC, SPA, Ramsar Site, SSSI.

Nearby listed buildings.

b) Oulton Broad

Area is within Oulton Broads Conservation Area.

High potential for archaeological remains in the area.

Flood risk (mainly zone 1, plus some 2 & 3, by EA mapping).

Nearby listed buildings.

c) Thorpe St Andrew

Area is within Thorpe St. Andrew Conservation Area.

Flood risk (mainly zone 2, some zones 1 & 3, by EA mapping).

The bounded area includes safeguarded minerals (sand and gravel) resources, but the Minerals Planning Authority has advised this is unlikely to constrain the type and scale of development supported by the Policy.

Large number of listed buildings.

d) Wroxham and Hoveton

Close to SPA and SAC.

Lies partly within Wroxham Conservation Area.

Flood risk (mainly zone 3 by EA mapping, and partly zones 1 & 2).

The SFRA shows almost all of the area is at risk of flooding.

Capacity of minor roads in the area.

Wroxham Bridge is a Scheduled Monument.

The Grange - Grade II listed

Reasoned Justification

The purpose of a development boundary is to consolidate development around existing built-up communities where there is a clearly defined settlement where further development, if properly designed and constructed, would not be incongruous or intrusive because of the size of the settlement. Development Boundaries have twin objectives of focusing the majority of development towards existing settlements while simultaneously protecting the surrounding countryside.

Early in the evolution of the Broads Local Plan some consideration was given to the merits of not having development boundaries at all, but it was concluded that these could continue to be a useful tool in promoting sustainable development in the Broads.

Development is directed to areas with Development Boundaries as listed in the policy and defined on the Local Plan Policies Map. Development in these areas could be acceptable, notwithstanding other policies, constraints and other material considerations. It is important to note that just because an area has a Development Boundary, this does not mean that all proposals for development in the area are necessarily acceptable. A lot depends on the detail and location of the proposal. The sensitivities of the Broads in terms of biodiversity, landscape, cultural heritage and flood risk mean that careful consideration must be given to the appropriateness of developing a site, and each proposal will be determined against this and other policies of the Plan. Outside the defined development boundaries, new residential development will not be permitted except in the circumstances defined in the other housing policies.

The areas with development boundaries are rolled forward from the 2014 Local Plan. To support the Authority's approach a Development Boundaries Topic Paper and Settlement Study have been produced. This work assesses the suitability of settlements for Development Boundaries and seeks to justify why the four areas (Horning, Oulton Broad, Thorpe St Andrew and Wroxham and Hoveton) have Development boundaries.

Development boundaries are also important for residential moorings. One of the key criteria of policy PUBDM35 relates to the mooring being within or adjacent to a development boundary (a Broads Authority Development Boundary or one of our constituent Council's). The Authority also regards other areas as being suitable for residential moorings which are not adjacent to development boundaries. These are in Brundall (policy PUBBRU6), Horning (policy PUBHOR7), Beccles (PUBBEC2) and Stalham (policy PUBSTA1). The areas covered by these policies are not deemed suitable for development boundaries to reflect constraints on the land, but are still accessible to services and facilities that make them suitable for residential moorings.

Some development proposals could be acceptable outside of Development Boundaries in exceptional circumstances although this will depend on detail, constraints in the area and accordance with other adopted policies and the NPPF. For example PUBDM36 (dwellings for rural enterprises) and PUBDM38 (replacement dwellings).

If a proposal is considered to potentially have an effect on an internationally designated site, then it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.

Regarding the development boundary for **Horning**, the Broads part of the village is a substantial length of river frontage of varying character and a range of uses, including dwellings, shops, pubs, boatyards, etc. Trees, garden planting and lawns, and open areas make an important contribution to the character of the area. There is a significant range of local services including a number of shops, public houses, post office, recreation ground, primary school and pre-school, etc. A bus service runs about half hourly by day, and hourly in the evenings, to Wroxham/Norwich and Stalham. Although there are no significant undeveloped areas within the core of the village (apart from those important as open space, etc., and dealt with under other policies), there is some potential scope for incremental renewal and replacement development, subject to other policies on flood risk. The boundary has been deliberately drawn to specifically exclude the southern 'water gardens' plots area, the immediate riverside where this is currently un-built, and more generally excluding gardens, etc. to reflect the government's definition of previously developed land. For development proposals in Horning, of particular importance is policy PUBDM1 regarding water quality and Knackers Wood Water Recycling Centre constraints (see Sites Specifics section of this Local Plan).

Regarding the development boundary for **Hoveton and Wroxham**, this combined area is one of the largest concentrations of development, population and services in the Broads. It has a range of shopping, employment opportunities, leisure and health facilities, etc., and relatively frequent rail and bus services. Although there is little undeveloped land (aside from gardens and public spaces) there has long been a gradual renewal and replacement of buildings and uses within the area, and there are at present a limited number of derelict or underused sites ripe for redevelopment. The development boundary excludes areas identified as open space, and includes boatyards and other development on the south (Wroxham) bank. It also complements the Hoveton Town Centre policy (PUBHORX) to continue the focus of retail and related development in the village centre. Parts of the area are at risk of flooding. The relevant Local Plan and National Planning Policy Framework Policies will apply, and a site flood risk assessment may be required to establish the degree of risk.

Regarding the development boundary for **Oulton Broad**, together with Lowestoft, the area has a wide variety of services, facilities and employment opportunities, and although most of these are at some distance from the area under consideration, there is a bus service here, and the distances involved make walking and cycling feasible options. The development boundary has been drawn to generally exclude the edge of the Broad except where there is already significant built development, in order to discourage building on the waterfront for flooding and landscape reasons, and to encourage continuance of the overall level of trees and planting which provides an important part of the setting of the Broad and contributes to its value for wildlife. Parts of the area are at risk of flooding. The relevant Local Plan and National Planning Policy Framework Policies will apply, and a site flood risk assessment may be required to establish the degree of risk. In the light of the potential for archaeological remains in the area an archaeological survey may be required in advance of any grant of planning permission

Regarding the development boundary for **Thorpe St Andrew**, only part of the south side of Yarmouth Road in Thorpe St Andrew is within the designated Broads area. Elsewhere Broadland District Council is the local planning authority and this part of Thorpe St Andrew is urban in character. Thorpe has itself a range of facilities and services, including employment opportunities, and good public transport links to the extensive facilities of Norwich (also within cycling distance). Although there are a range of buildings and uses within the identified boundary, in practice it is not anticipated that there will be a great deal of development in the foreseeable future, but the development boundary provides additional scope for some redevelopment if opportunities arises, subject to flood risk. This complements the identification of the Broadland District Council part of Thorpe St Andrew as a growth location in the Greater Norwich Joint Core Strategy.

Policy PUBDM34: Gypsy, Traveller and Travelling Show People

Development proposals for the provision of permanent or transit accommodation, or temporary stopping places, to meet the needs of Gypsies and Travellers and Travelling Showpeople will be supported where they meet a proven need, as identified by a Gypsy and Traveller Accommodation Assessment.

Development proposals that would have an unacceptable adverse impact on the special qualities of the Broads will be refused. Appropriate development will be allowed where the following criteria are met:

- a) Avoid sites being over-concentrated in any one location or disproportionate in size to nearby communities;
- b) Well related to existing settlements, services and facilities and do not harm the character and appearance of the area;
- c) Within reasonable distances to facilities and supporting services;

- d) Are on brownfield (previously developed) land;
- e) There are no significant adverse impacts on the safe and efficient operation of the highway network;
- f) There is adequate provision for parking, turning and safe manoeuvring of vehicles within the site;
- g) Transit sites should be in close proximity to the main established travelling routes in the area;
- h) Have clearly defined physical boundaries and will be appropriately screened and landscaped and be capable of visual privacy;
- i) The site will not have any adverse effects on the setting of any heritage asset or any adverse impact on the character and appearance of the surrounding landscape;
- j) Permanent built structures in rural locations or on settlement fringes are restricted to essential facilities;
- k) There is sufficient amenity space for occupiers;
- l) The design, layout and density of the site are based on Government guidance in 'Designing Gypsy and Traveller Sites'⁶ (or successor documents);
- m) Sites or pitches are capable of being provided with adequate infrastructure such as power, water supply, foul water drainage and recycling/waste management;
- n) Proposals do not cause unacceptable harm to the amenity of neighbouring uses and occupiers and the tranquillity of the area;
- o) Due regard has been given to all types of flood risk; and
- p) Sites are not proposed which will impact on Natura 2000 sites.

Transit or temporary sites may have conditions applied relating to length of occupancy in consultation with the Housing Authority.

Reasoned justification

The Government's Planning Policy for Traveller Sites document states '*where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community*'.

<<insert text re Gypsy, Traveller and Travelling Show People need when study completed>> This criteria-based policy enables the Authority to assess any applications that may come forward for such sites that may address the need of the Authority's constituent District Councils. The justification of each of the criteria in the policy is discussed below.

Sites in or near to existing settlements are prioritised. Such sites are generally more sustainable than those in remote areas, with better access to services and in particular education and health. The Authority's preference would be for well related sites located in and near to settlements with a development boundary (either in the Broads Executive Area or one of our constituent district councils) and/or classed as local service centres and above in the settlement hierarchy of our constituent districts. The priority will be that access to services can be reasonably obtained so as to meet the day to day needs of the occupiers, recognising the differences in lifestyles, working patterns and transport preferences. The criteria used in the Settlement Study could be used to determine how well related to settlements proposals are.

National planning policy encourages planning policies and decisions to encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not

⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf

of high environmental value. Given that the Authority does not have a need for Gypsy and Traveller sites or pitches, there is no need for greenfield sites to be developed.

Sites are required to have safe and convenient vehicular access and provide adequate car parking space. The development should avoid significant impacts on local roads and be well located to major routes.

The local topography and form of the landscape will affect the visibility of a Gypsy and Traveller site and will affect its ability to integrate into its surroundings. Some sites will be highly visible, and others more visually contained. The Broads is a protected landscape and sites should respect the scale of the environment, including the historic environment, be of a scale proportionate to the local community and be capable of visual privacy. Sites which allow appropriate natural screening will be considered more favourably. Other policies of the Local Plan are likely to be of relevance such as policy PUBDM16 on Landscape, policy PUBDM40 for Landscaping and policy PUBDM20 on Settlement Fringe. The Government's design guide for Gypsy and Travellers emphasises key elements necessary to design a successful site.

To meet the needs of occupiers, proposals need to be capable of being served by appropriate service infrastructure, including public and/or private water supplies and treatment works as appropriate (see policy PODM1 on water quality).

In order to ensure sites provide a healthy and safe environment for occupiers, sites should not be located on contaminated land and avoid areas of unsuitable noise, air quality and major hazards such as pipelines. In line with adopted amenity, tranquillity and light pollution policies, the proposals should not have a negative impact on neighbours and tranquil areas as well as have appropriate lighting that should not add to light pollution.

Caravans and mobile homes are vulnerable to flooding. National and local policies dictate that sites should not be allocated in areas of high risk of flooding, including that of functional flood plains.

The Broads has a wealth of environmental assets and site locations must not compromise the objectives of any designated areas.

Any planning permission will include a planning condition or obligation to ensure that occupancy of the site is limited to persons able to demonstrate an essential need for the accommodation. When any temporary permission is granted, a planning condition will be attached or an obligation secured to ensure that the permission is for a limited time period, after which time the use shall cease and the land must be restored to its former condition, within a specified period.

Meeting the need for 'houseboats'

<<Insert text regarding houseboat/residential mooring need when study completed>>

Policy PUBDM35: New Residential Moorings

Applications for permanent residential moorings **will be permitted** provided that the mooring:

- a) Is in a mooring basin, marina or boatyard that is within or adjacent to a defined development boundary and, if more than one residential mooring is proposed, the proposal is commensurate with the scale of development proposed for that settlement (as a whole). Furthermore, that the mooring basin, marina or boatyard provides an adequate and appropriate range of services and ancillary facilities to meet the needs of the occupier of the

residential moorings (for example potable water and electricity) or provides adequate access to local facilities in the vicinity;

- b) Would not result in the loss of moorings available to visitors/short stay use;
- c) Would not impede the use of the waterway;
- d) Would not **have an adverse impact** upon:
 - i) the character or appearance of the surrounding area from the use of adjacent land incidental to the mooring;
 - ii) protected species, priority habitats and designated wildlife sites;
 - iii) the amenities of neighbouring occupiers; or
 - iv) bank erosion.
- e) Provides safe access between vessels and the land without interfering with or endangering those using walkways;
- f) Has adequate car parking and makes provision for safe access for service and emergency vehicles and pedestrians;
- g) Would not prejudice the current or future use of adjoining land or buildings;
- h) Makes adequate provision for waste, sewage disposal and the prevention of pollution; and
- i) Provides for the installation of pump-out facilities (where on mains sewer) unless there are adequate facilities in the vicinity.

Proposals need to set out how provisions will be made for facilities associated with residential uses (such as rubbish, amenity space, external storage and clothes drying for example).

All such development will meet the requirements of the Water Framework Directive.

(Note: Refer to <https://www.gov.uk/guidance/pollution-prevention-for-businesses> for information on pollution prevention measures)

Reasoned Justification

Tourism makes a valuable contribution to the local economy and a statutory purpose of the Broads is to provide opportunities for the understanding and enjoyment of the special qualities of the area by the public. To ensure there are sufficient facilities to allow visitors to enjoy the Broads, the Authority will therefore resist proposals for permanent residential moorings where they would result in the loss of visitor/short term moorings or boatyard services.

To ensure that people living on boats have access to adequate facilities, such as education, recreation and other community facilities and services such as domestic waste collection, and to minimise impact of new development on landscape character, the Authority will require new residential moorings to be directed to mooring basins, marinas or boatyards in or adjacent to defined development boundaries (which could be within the Broads Authority Executive Area or in the planning area of our constituent districts). Proposals for residential moorings will be expected to be commensurate in scale with the size of the settlement as well as the level of residential development proposed for the settlement by the relevant Local Planning Authority.

Residential moorings that have the potential to affect a protected site or species will only be permitted where a project level Appropriate Assessment (under the Habitats Directive) can successfully demonstrate that there are no adverse effects on qualifying features on the site or a detrimental impact on the species.

In order to protect visual and residential amenity and to ensure that the use of residential moorings does not compromise public safety, where permission is granted for a new permanent residential mooring planning conditions and/or obligations will be used to secure agreements for the management of the mooring and surrounding land. The use of surrounding land for incidental purposes such as storage and seating can have a negative impact if incorrectly managed. Policy PUBDM47 provides guidance on the forms of development that will be permissible on the adjacent waterside environment associated with a mooring.

For the purposes of this policy, a residential mooring is one where someone lives aboard a vessel (which is capable of navigation), that the vessel is used as the main residence and where that vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base.

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

- a) The technique/method of mooring the vessel. The Flood Risk Assessment (FRA) should show how the boat will be able to be moored to prevent it from being too tight or too loose. If the vessel is moored too tightly 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, so should be addressed within the FRA.
- b) A Flood Response Plan needs to be produced. While it is acknowledged that residential boats will float, the access to the boat could be disrupted at times of flood which would cause the occupier to be stranded on board the boat. The Flood Response Plan needs to advise what the occupier should do at times of flood to ensure their safety; whether they should evacuate the boat in advance of flooding or take refuge in the boat and therefore have supplies to help them sit out the flood.
- c) Finally, the FRA should include consideration of how the boat moored at the residential mooring will be monitored at times of flood to ensure it does not cause damage to other vessels and to prevent damage to the belongings on board (and indeed the boat itself).

The paraphernalia associated with residential moorings can affect the special qualities of the Broad as well as the operation of the marina or boatyard in which they are located. Proposals will need to set out how they will address areas for clothes drying, the drying of clothes and amenity space as well as any other related facilities for those living on the boats to use. The Authority does not necessarily expect marinas and boatyards to subdivide or demarcate areas of land to be associated with residential moorings.

Policy PUBDM36: Permanent and Temporary Dwellings for Rural Enterprise Workers

Development of a new dwelling or a residential mooring for rural workers will only be permitted outside the defined development boundaries if:

- a) Satisfactory evidence is submitted that demonstrates an existing essential need for full time worker(s) to be available on site or nearby at all times for the enterprise to function properly;
- b) The need is arising from a worker employed either full-time or one employed primarily in the Broad in a rural enterprise;
- c) Evidence is submitted that demonstrates that the business has been established for at least three years, has been profitable for at least one of them, is currently financially sound and has a clear prospect of remaining so;
- d) The functional need cannot be met by an existing dwelling on the site or nearby and there

has been no sale on the open market of another dwelling on the site that could have met the needs of the worker in the past three years;

- e) Where practicable and appropriate, first consideration has been given to the conversion of an existing building;
- f) The dwelling is commensurate in size and scale with the needs of the enterprise and the cost would be viable in relation to the finances of the enterprise;
- g) The dwelling is sited so as to meet the identified functional need and is well related to any existing buildings of the enterprise; and
- h) The proposal would not adversely affect the historic environment, landscape character or protected species or habitats.

Should a new dwelling be permitted under this policy, the Authority will impose a condition restricting its occupation to a person (and their immediate family) solely or mainly employed in agriculture, forestry or a Broads related rural enterprise, as appropriate.

The removal of an occupancy condition will only be permitted in exceptional circumstances where it can be demonstrated that:

- i) There is no longer a long-term need for the dwelling on the particular enterprise on which the dwelling is located; and
- j) Unsuccessful attempts have been made to sell or rent the dwelling at a price that takes account of the occupancy condition.

Applications for a temporary mobile home, caravan or residential mooring for rural enterprise workers, will only be permitted if;

- k) Residential occupation would be for a period of up to three years;
- l) There is clear evidence that the proposed enterprise has been planned on a sound financial basis for the same period (or longer) which the application seeks permission for a temporary dwelling/residential mooring for;
- m) The functional need cannot be met by an existing dwelling on the site or nearby;
- n) In relation to temporary caravans and mobile homes, the proposed temporary dwelling would not be located in Flood Risk Zone 3;
- o) The temporary structure can be easily dismantled or taken away; and,
- p) The proposal would not adversely affect protected species or habitats.

Any planning permission granted will specify the period for which the temporary permission is granted and the date by which the temporary dwelling/mooring will have to be removed. Successive extensions to a temporary permission will not normally be granted unless material considerations indicate otherwise.

After three years (or such other period as the temporary permission may be for), if there is no planning justification for a permanent dwelling, then the mobile home or caravan must be removed or, for a residential mooring, the vessel's residential use must cease.

Reasoned Justification

The erection of dwellings outside defined development boundaries has the potential to have a negative impact on the openness and special character of the Broads. Rural Enterprise dwellings outside development boundaries will require special justification for planning permission to be granted. The NPPF states that one such instance is when accommodation is required to enable agricultural, forestry and certain other full-time rural workers to live at, or nearby, their place of work.

For the purposes of this policy, the term 'rural workers' relates to those who work in agriculture, horticulture, forestry, tourism and boatyards and other enterprises which require a rural location. Any application would need to fully justify why it considers the dwellings to be linked to a rural enterprise.

While proposals which support the proper functioning of rural enterprises will generally be supported because of the contribution such enterprises make to the local economy, in order to protect the landscape character of the Broads essential workers dwellings will only be permitted where there is a demonstrable need for a full time worker(s) to live at, or very close to, the site of their work and this functional need cannot be met by an existing dwelling on the site or in the locality.

When judging locality, the Authority will take into account what the requirement of the business is for an employee to live nearby and what a reasonable distance to travel to the business is. This will vary on a case-by-case basis and an application should explain what distance is appropriate and why.

To ensure that this demand for a dwelling is likely to be sustained, proposals must be accompanied by evidence to demonstrate that the business has been established for at least three years, profitable for at least one of them, currently financially sound and has a clear prospect of remaining so. A business plan for the subsequent three years will assist in assessing the future prospects.

Any proposals to convert buildings to become a rural enterprise dwelling (criterion e) will be considered against the relevant conversion policies in the Local Plan. When looking at dwellings that already exist nearby (criterion d), properties available for rent need to be considered as well as those available to buy and it should be demonstrated what price the enterprise can reasonably afford.

Any new dwelling permitted under this policy will be restricted in size and scale to one which is commensurate with the needs of the enterprise to ensure that the proposal does not have an unacceptable impact on the special landscape character of the Broads. Furthermore, the cost of constructing the dwelling in relation to what can be afforded by the enterprise is an important consideration as the erection of a dwelling should not affect the finances such that the enterprise would no longer be financially viable. Permitted development rights for future extensions and alterations may be removed in order to maintain control over the size of the dwelling, in the interests of protecting the landscape and local character.

If a proposal is considered in the context of this policy to potentially have an effect on an internationally designated site then it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.

Applicants should be aware that the Authority will use appropriate external expertise when necessary to assess the more technical information required to accompany proposals. The independent review shall be carried out entirely at the applicant's expense

Where a new dwelling is permitted, the occupancy will be restricted by condition to ensure that it is occupied by a person, or persons currently or last employed working in local agriculture, horticulture, forestry, and other rural activities, or their surviving partner or dependant(s).

Due to changing farm practices, the vulnerability of the agricultural sector and potential decline in other rural businesses, there may be instances where a dwelling or mooring for a rural worker is no longer required. The Authority will only consider favourably applications to remove occupancy conditions where it can be demonstrated that there is no longer a need for the dwelling on the

particular enterprise on which the dwelling is located, either due to changes in the nature of the business or because the business is no longer viable. Applications for the removal of occupancy conditions will also need to be accompanied by robust information to demonstrate that unsuccessful attempts have been made, for a continuous period of at least 12 months, to sell or rent the dwelling at a reasonable price which takes account of the occupancy condition, including offering it to a minimum of three local Registered Social Landlords operating locally on terms which would prioritise its occupation by a rural worker as an affordable dwelling, and that option has been refused. With regards to criterion J, unless there are special circumstances to justify restricting the dwelling to the particular enterprise where the dwelling is located, an occupancy condition is likely to allow occupation by other workers in the locality, in which case it should be considered whether there is other demand locally, and not just whether the demand for this particular enterprise has ceased.

Proposals for a temporary mobile home or residential mooring for rural workers will only be permitted for a period of up to three years. In order to protect the landscape character of the Broads, a planning condition will be attached to any permission to ensure that any mobile home or vessel is removed at the end of this three year period. The NPPG lists caravans and mobile homes for permanent occupation as a 'highly vulnerable' use. Accordingly, proposals to site a caravan or mobile home in an area defined as being within Flood Zone 3 will be contrary to the NPPG on flood risk.

Any new or converted dwelling needs to address the requirements of other policies in this Local Plan such as.

Policy PUBDM37: Residential Ancillary Accommodation

Residential ancillary accommodation within the curtilage of an existing residential building is acceptable in principle subject to other policies of this Plan

Residential ancillary accommodation shall be functionally integral to the main dwelling, where this is not possible, residential ancillary accommodation shall be physically linked to the main dwelling. Only where this is not feasible consideration will be given to the conversion of a detached outbuilding, and only where this is not feasible will consideration be given to new build detached residential ancillary accommodation. In all cases, there will not be boundary treatments that physically separate the accommodation from the main dwelling nor a separate vehicular access.

In all cases a restriction will be applied limiting the occupation of the residential ancillary accommodation by condition/planning obligation to remain ancillary to the main dwelling and in occupation by family members and prevent the sale of the residential ancillary accommodation on the open market.

Reasoned Justification

The creation of residential ancillary accommodation to an existing dwelling can create a useful facility for the support and care of family members. With an increasingly elderly population and rising life expectancy in the area, there are an increasing number of people who, although capable of living relatively independently, would benefit from living close to relatives or carers who they can rely on for help and support. This need can often be met through the purchase of a nearby property.

However, on some occasions it may be important for the carer or relative to be closer at hand to provide care and support at short notice. Residential ancillary accommodation can offer a way of addressing this more immediate need.

Fundamentally, residential ancillary accommodation needs to be designed so that it will continue to be used as part of (integral to) the main dwelling, without creating an independent dwelling unit. This should include the option of absorbing the residential ancillary accommodation back into the main dwelling accommodation if necessary, by the same or future occupiers.

There are two ways which the Authority considers residential ancillary accommodation to be integral. Residential ancillary accommodation can be functionally integral which means that only a bathroom or kitchen is provided and not both with the existing building providing the other facility. If physically attached to the main building then independent facilities could be acceptable subject to a link being maintained between main dwelling house and residential ancillary accommodation. Residential ancillary accommodation can be physically integral/dependent which means attached to the existing building and therefore shares facilities with the existing building. In both cases, it is acceptable for residential ancillary accommodation to have a separate entrance.

The provision of residential ancillary accommodation in the countryside could lead to detrimental impacts on the environment and landscape. Unduly large or detached residential ancillary accommodation can prove an economic and practical liability when vacated or when the property changes hands and this leads to pressure for the residential ancillary accommodation to be severed and let separately from the main dwelling. This can create sub-standard dwellings with inadequate standards of access, amenity and space and could result in pressure in the future to permit the residential ancillary accommodation to be let or sold as an independent unit contrary to the objectives of sustainable development and contrary to other policies in the Local Plan.

As such it is usually preferable for residential ancillary accommodation in rural areas to be in the form of extensions to existing dwellings, which are capable of serving the needs of the dependents, but which are easily integrated into the existing dwelling when no longer required.

Detached residential ancillary accommodation in the countryside are more likely to be visually prominent and are often set in larger plots, thereby being more likely to be capable of being let or sold independently in the future. The conversion of existing outbuildings (such as garages) to residential ancillary accommodation can be preferable to a new annexe being built. The conversion of a building is less likely to be visually intrusive and it is likely that a converted building can be returned to its original use when no longer required. However in some circumstances the conversion of existing buildings may still be undesirable, particularly if it would lead to the requirement for new outbuildings to be built or for the converted building to be substantially altered. An additional consideration will be the distance of any existing outbuilding proposed to be converted to a residential ancillary accommodation, from the main dwelling. The further away the proposed residential ancillary accommodation is from the main dwelling, the less the functional integration.

Any residential ancillary accommodation will have planning conditions or obligations attached to the permission which could relate to the occupier(s) of the accommodation or prevent use as an independent separate dwelling.

Sustainability Appraisal Summary

Evidence used to inform this section

Monitoring Indicators

Policy PUBDM38: Replacement Dwellings

Replacement dwellings outside of the development boundary will be permitted on a one-for-one basis provided that:

- a) The existing dwelling has a lawful residential use; and
- b) The existing dwelling has no historic, architectural or cultural significance making it worthy of retention.

If criteria a and b have been met:

- c) The scale, mass, height, design and external appearance of the replacement dwelling are appropriate to its setting and the landscape character of the location; and
- d) The replacement would be located within the same building footprint as the existing dwelling or in an alternative location within the same curtilage, which would be at a lower risk of flooding or would provide benefits for landscape, wildlife or cultural heritage.

Where permission is granted, conditions will be attached to ensure that the existing dwelling is demolished and removed from the site prior to the replacement dwelling first being occupied.

Reasoned Justification

Applications for replacement dwellings often come forward where an existing dwelling is in disrepair.

Replacement dwellings of a scale, mass, height, design or external appearance that is inappropriate to their setting can, either individually or cumulatively, have a detrimental impact on the landscape character of the Broads and undermine the reasons for its designation. The replacement of dwellings outside defined development boundaries therefore needs to be managed in order to prevent development that would be unacceptable by virtue of its size, design or positioning.

Where the residential use has been abandoned, any proposals will be assessed against policies for new build residential dwellings.

Replacement by a new dwelling of modern building and energy efficiency standards demands particular attention to design and siting to avoid harm to the landscape and character of the area.

The replacement dwelling should be sited on or close to the existing footprint of the building unless the benefits that may be achieved for flood risk, landscape character, wildlife or cultural heritage can justify the replacement dwelling to be sited in an alternative location. In such situations, locations that are inherently more sustainable will be favoured such as replacing a remote substandard dwelling in the open countryside with a dwelling in a nearby settlement.

In terms of this policy the 'existing dwelling' is the dwelling as it exists at the point of application to the Broads Authority.

A condition will also be attached to any planning permission to ensure that where the existing building is not demolished prior to construction, it is removed from the site prior to the replacement building being occupied.

If a proposal is considered in the context of Policy PODM13 to potentially have an effect on an internationally designated site, then it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.

Of relevance to this proposals for replacement dwellings is policy PODM1 on water quality and policy PODM4 on flood risk.

Policy PUBDM39: Elderly and Specialist Needs Housing

. When assessing the suitability of sites and/or proposals for the development of or change to elderly or specialist needs housing the Authority will have regard to the following:

- i) The local need for the accommodation proposed;
- ii) The ability of future residents to access essential services, including public transport, GPs and shops;
- iii) Whether the proposal would result in an undue concentration of such provision in the area;
- iv) Impact upon amenity, landscape character, the historic environment and protected species or habitats.

Reasoned Justification

This policy reflects the ageing population of the Broads Authority Executive Area. The NPPG says *'older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan'*.

Older people in housing are included in the Objectively Assessed Need as calculated in the Central Norfolk SHMA. However, those in Class C2 are not included. According to the Central Norfolk SHMA, the institutional population (older people residing in care homes) is projected to increase by 3,909 persons between 2015 and 2036 in the Central Norfolk SHMA authority areas (North Norfolk, Norwich, Broadland, South Norfolk, Breckland). The OAN as set out previously in this section does not include this figure.

However it does not necessarily follow that all of this need should be provided as additional bedspaces in residential institutions in Use Class C2. It is important to note that the Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible, thereby avoiding expensive hospital and care home services. Therefore, despite the ageing population, current policy means that the number of care home and nursing home beds required may increase proportionately more slowly than the number of older people, as people are supported to continue living in their own homes for longer.

Of relevance to housing for older people are the following policies of the Local Plan:

- Policy PUBDM37 refers to residential ancillary accommodation acknowledging that the creation of residential annexes to an existing dwelling can create a useful facility for the support and care of family members.
- Policy PUBDMxxx relates to design and in particular dementia and lifetime homes.

The Accommodation for older people – current supply, current need and future need study was completed by Norfolk County Council in 2017. According to the study, the total population in Norfolk is forecast to increase by 13% in 2036, with the highest increase in the population aged 75 and older of 70%. The study does not identify a need for elderly housing specifically in the Broads Authority Executive Area; instead information is presented at a district level. The Authority therefore has taken the approach of criteria based policy in relation to elderly housing needs to enable applications to be assessed.

The Authority considers it important for this accommodation to be close to services and facilities to provide benefits to residents, staff who work there as well as visitors. In the Broads, these locations will be those with Development Boundaries as set out elsewhere in this Local Plan.

Policy PUBDM39: Custom/self-build

The Authority encourages developers of multi-dwelling sites to set aside part of their scheme for custom/self-build plots.

Custom/self-build dwelling proposals will be considered in accordance with other policies in the Local Plan on the location of new dwellings.

Reasoned Justification

The term 'self-build' or 'custom-build' is used when someone obtains a building plot and then builds their own home on that plot. The majority of work can be completed by the future occupiers, or the future occupier could take the role of project manager and employ professionals to deliver their plans. Such homes can be built as a one off or on a community basis. The Government wants to enable more people to build their own home and wants to make this form of housing a mainstream housing option.

It is important to understand that self-build/custom-build schemes are still required to meet the policy requirements in local plans as well as national policy and guidance. The schemes are still subject to the same constraints as developer delivered dwellings and the policy refers to this.

Some councils are looking into policies that require a certain percentage of a larger development to be set aside for custom/self-build. The Authority is not likely to receive applications for large scale development, but the policy does encourage developers to set aside plots for custom/self-build plots.

In accordance with policy **PUBSP12, PUBDM31 and PUBDM33**, custom/self-build development is directed to settlements with development boundaries. Custom/self-build proposals in rural areas will be determined in line with other policies in this Local Plan.

Custom/self-build register

Since April 2016, the Authority has a register⁷ in place where those wishing to build their own homes can register their interest. At the time of writing there were **41** individuals interested in building their own home. However, it is important to note that the register covers four Local Planning Authorities who are working together: South Norfolk, Breckland, King's Lynn and West Norfolk and the Broads Authority. When assessing the register it seems that, in the vast majority of cases, individuals have stated that they wish to develop in the Broads as well as in another district; there are few, if any, individuals expressing a desire to develop in the Broads alone.

⁷ <http://www.broads-authority.gov.uk/planning/Other-planning-issues/self-build-and-custom-build-register>

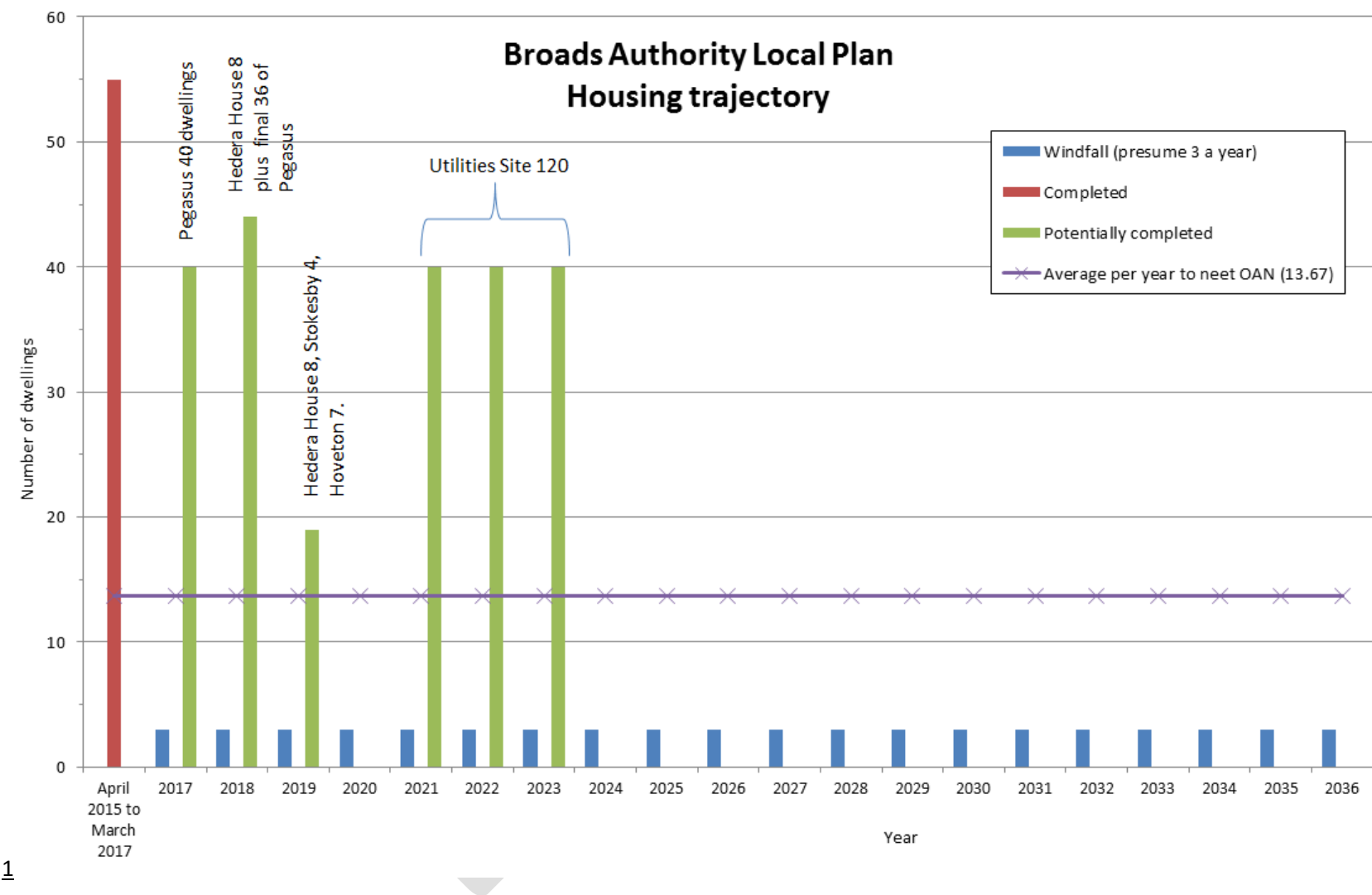
Monitoring Indicators

- Number of dwellings permitted and completed.
- Replacement dwellings permitted in line with this policy
- Number of permissions for self-build
- Number of residential annexes permitted – integral or not integral
- Number of affordable housing dwellings delivered.
- Dwellings permitted within development boundaries.
- Number of rural enterprise dwellings permitted in accordance (or otherwise) with this policy.
- Number of residential moorings provided in line with this policy.
- Gypsy and Traveller and Travelling Show People sites/pitches.

Evidence used to inform this section

- Sustainable Settlement Study (2016), Development Boundaries Topic Paper (2016), Central Norfolk Strategic Housing Market Assessment (2017), Housing Need Topic Paper (2017). HELAA (2017), Gypsy and Traveller Study and Caravan and Houseboat Study (2017), **elderly person.**
<http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>
- PPS7:
<http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/archive/d/publications/planningandbuilding/pps7>
- The most recent Development Plan of our constituent District Councils – affordable housing.

Appendix





Duty to Cooperate Statement.
Statement of Cooperation on Strategic Planning Matters
In support of the Proposed Broads Local Plan¹
August 2017

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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 92² 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.

² Oulton Broad Parish Council was formed in 2017.

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 Councillor to Membership of the Broads Authority. Norfolk County Council has two appointed members with Suffolk County Council and the Districts having 1. A number of the Local Authority Appointed members sit on the Planning Committee. The Planning Committee's role relates to Development Management, Enforcement, Tree Protection Orders and Conservation Area 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
 - Brian Iles, Norfolk County Council
 - Melanie Vigo Di Gallidoro, 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. This 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. At the time of writing, the document was out for consultation. Please see Appendix B that assesses the Local Plan against the draft NSF agreements.

- iii) **Joint Member Group Meeting³ – Norfolk.** This meets quarterly and cross boundary issues are discussed with the way forward recommended for each constituent LPA to then take forward.
- iv) **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.
- v) **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.
- vi) Joint working with relevant district councils regarding the **Neighbourhood Plan⁴s** that straddle both Local Planning Authority boundaries.
- vii) **Specific discussions at officer level** on emerging cross boundary issues by telephone, email and meetings.
- viii) **Other ongoing engagement at officer level including**
 - a. Norfolk Local Authorities Chief Executives (including police and fire service)
 - b. Norfolk Planning and Biodiversity Topic Group
 - c. Norfolk Conservation Officers Group
 - d. Suffolk Conservation Officers Forum
 - e. Norfolk Heads of Planning
 - f. Norfolk public services summit (including the police and Public Health)
- ix) **Formal consultations** on development plan documents, supplementary planning documents, and planning applications with potential cross-boundary implications.
- x) BA is a member, and sits on the management group of the **Norfolk Coast AONB Partnership.**
- xi) 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.

³ <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum>

⁴ <http://www.broads-authority.gov.uk/planning/planning-policies/neighbourhood-planning>

- xii) BA is a member of the ***Suffolk Biodiversity Partnership***, along with Suffolk County Council.
- xiii) ***Arrangements with Norfolk County Council*** for the provision of advice and services in relation to, historic environment and archaeology, legal and property advice.
- xiv) 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 development⁵, 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.
- xv) ***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. The Norfolk Strategic Framework also addresses this.

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 Councils 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.

⁵ That being said, in undertaking its functions, the Broads Authority must have regard to the needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads.

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. There is the Most of Norfolk Gypsy and Traveller, caravan and houseboat study and most of Norfolk Strategic Flood Risk Assessment. A Green Infrastructure/ecological networks study is underway (as at August 2017). 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 GNGP 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.

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 Planning
- Conservation Officers
- landscape
- Ecologists
- recreation and tourism

The National Parks, though 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 adaption, wind farms and other renewable generation, contribution of development to landscape, wildlife, cultural heritage and recreation, etc. Since 2017, the BA Management Team has begun to meet regularly (on a six monthly basis) with the Management Teams/Senior Figures of the key stakeholder groups including, NE, NWT, EA, SWT, LEP and BHBF and NSBA

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.) Previous Joint projects including 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. Membership of the Landscape Partnership Board.

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. Membership of the Landscape Partnership Board.

Previous Joint projects including 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 tranquillity 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. It is noted that there are intentions to improve the Acle Straight and there is a policy that emphasises the issues to consider when producing the scheme. HE are supportive of this policy.

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.

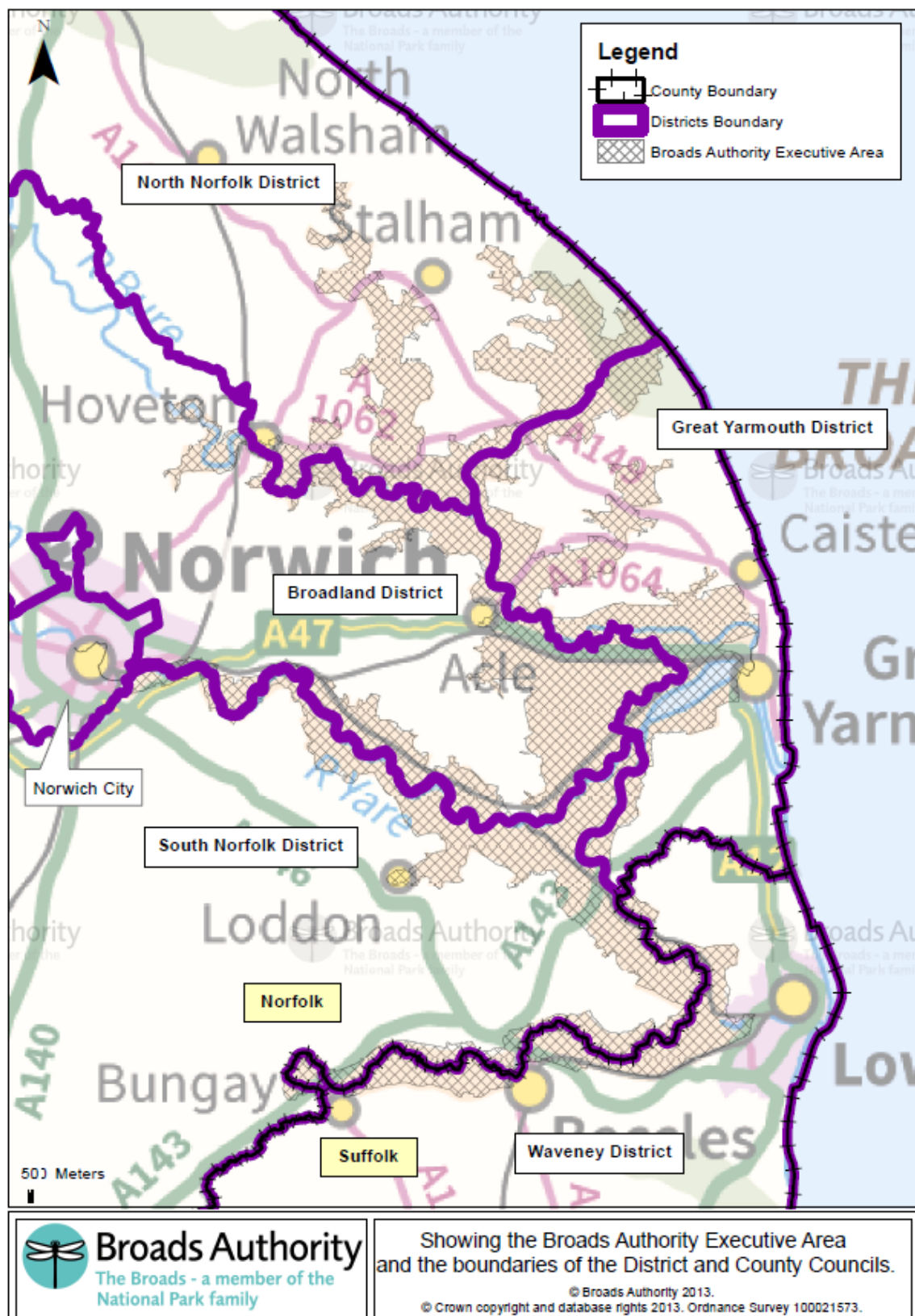
17 Marine Management Organisation

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

18 LEP and LNPs

The Broads Authority's Management Team meets with a member of the LEP Executive Team on a six monthly basis. The Chief Executive of the LEP is a member of the GNGB Board. The BA has had representatives on Wild Anglia's Board (Andrea Kelly, Senior Ecologist). At each stage of the process, New Anglia and Wild Anglia have been consulted.

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



Appendix B: Assessment of the Local Plan against the Draft Norfolk Strategic Framework Objective, August 2017.

Introduction

In early 2015 the Norfolk Local Planning Authorities, working through its strategic planning member forum, agreed to formally cooperate on a range of strategic cross-boundary planning issues through the preparation of this Norfolk Strategic Framework. The aim of producing the framework is to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of future Local Plans;
- Demonstrate compliance with the duty to co-operate;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high level plans (such as the Strategic Economic Plan); and
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

This assessment shows how the Local Plan meets each of the draft agreements. At the time of writing, the NSF was out for an 8 week consultation. As such, this assessment relates to the draft agreements as consulted on.

Assessment of the Agreements

Agreement 1 - The Norfolk Planning Authorities have agreed that when preparing new Local Plans addressing housing needs they will produce documents which provide for the development needs of their areas until at least 2036.

The Broads Local Plan period is to 2036.

Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision:

“By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural and built environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life for residents. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel.”

The wording is generally reflected in the Local Plan’s vision:

By 2036 the Broads will be a place where...

The natural environment and the beneficial goods, services and cultural values it provides, from food and energy to landscape character and recreation, are in good condition, are used fairly and sustainably, and are valued by society. In particular, the precious nature of clean, fresh water as a fundamental resource is understood and respected by all.

The past and present importance of the waterways for navigation, biodiversity and recreation is recognised and cherished, and the asset is protected, maintained and enhanced. Wildlife flourishes and habitats are maintained, restored, expanded and linked effectively to other ecological networks. Land and water are managed in an integrated way, with local and landscape scale management creating resilience and enabling flexible approaches to meet changing ecological, economic and social needs.

The living, working, 'big skies' landscape is notable for its natural beauty, distinctive local character and historic significance. People of all ages, abilities and circumstances experience and enjoy it as a place of escape, adventure, enjoyment, learning and tranquillity, and as a source of national pride and identity. Sustainable living can be seen in action and there is a buoyant rural economy. Local communities are taking an active part in decisions about their future and are known for having been pivotal in the transformation to a low carbon, 'climate-smart' society.

And finally, the Broads National Park is forever recognised as fundamental to our prosperity, health and wellbeing, and forever treasured as a special place that provides a "breathing space for the cure of souls".

Agreement 3 - By 2036, through co-operation between Local Authorities and preparation of Local Plans, Norfolk will seek to maximise the delivery of the following objectives:

- 1): To realise the economic potential of Norfolk and its people by:
 - a) facilitating the development needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership (NA LEP) Economic Strategy and this framework;
 - b) fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
 - c) providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
 - d) ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements to strengthen inward investment; and
 - e) strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure.
- 2): To reduce Norfolk's greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change by:
 - a) locating development so as to reduce the need to travel;

- b) effecting a major shift in travel away from car use towards public transport, walking and cycling;
- c) maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- d) managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats

3): To address housing needs in Norfolk by:

- a) Providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes;
- b) Ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- c) Contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- d) Delivering high quality, energy efficient homes in attractive living environments which make a positive contribution to the health and well-being of communities; and
- e) Ensuring that homes are delivered at the right time to address identified needs.

4): To improve the quality of life for all the population of Norfolk by:

- a) ensuring new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure;
- b) promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- c) maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- d) ensuring all our communities are able to access excellent sporting facilities and health services;
- e) promoting regeneration and renewal of disadvantaged areas; and
- f) increasing community involvement in the development process at local level.

5): To improve and conserve Norfolk's environment by:

- a) ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, protected landscapes, Broads and coast;
- b) protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- c) maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- d) where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- e) protecting and, where appropriate, enhancing biodiversity through the preservation of habitats and species and creating new habitats through development;

- f) providing a network of accessible multi-functional greenspaces; and
- g) reducing the demand for and use of water and other natural resources.

The Objectives of the Local Plan are copied below and in general are in conformity with these objectives. The policies in the Local Plan in general also meet these objectives.

- OBJ1. The Broads remains a key national and international asset and a special place to live, work and visit.
- OBJ2. There are areas of true tranquillity and wildness, giving a real sense of remoteness.
- OBJ3. The Broads is a unique, highly valued and attractive environment where the landscape character and setting is protected, maintained and enhanced.
- OBJ4. The rich and varied habitats and wildlife are conserved, maintained, enhanced and sustainably managed.
- OBJ5. The coastal section of the Broads is used and managed in a balanced way beneficial and integrated way for people and wildlife.
- OBJ6. Water quality is improved and water is managed using appropriate measures to increase capture and efficiency, prevent pollution and reduce nutrients. Flood risk to people, property and landscapes is managed effectively.
- OBJ7. 'Climate-smart thinking' minimises future adverse impacts and makes use of opportunities in an area vulnerable to a changing climate and sea level rise.
- OBJ8. The area's historic environment and cultural heritage are protected, maintained and enhanced. Local cultural traditions and skills are kept alive.
- OBJ9. The housing needs of the community are met.
- OBJ10. Development and change are managed to protect and enhance the special qualities of the Broads as well as the needs of those who live in, work in and visit the area. The Broads Authority maintains close cooperation with the Local Planning Authorities adjoining its executive area.
- OBJ11. The Broads offers communities and visitors opportunities for a healthy and active lifestyle and a 'breathing space for the cure of souls'.
- OBJ12. There is a buoyant and successful rural economy.
- OBJ13. The Broads is renowned for sustainable tourism and supports a prosperous tourism industry.
- OBJ14. People enjoy the special qualities of the Broads on land and on water. Access and recreation is managed in ways that maximise opportunities for enjoyment without degrading the natural, heritage or cultural resource. Navigation is protected, maintained and appropriately enhanced, and people enjoy the waterways safely.
- OBJ15. The Broads continues to be important for the function, identity and recreation of the local community as well as over a wider area.
- OBJ16. Waste is managed effectively so there is no detriment to the environment.

Agreement 4: the Norfolk Planning Authorities have agreed to produce and maintain Strategic Housing Market Assessments covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk.

The Broads is in Great Yarmouth and Central Norfolk HMAs as well as Waveney HMA.

Agreement 5: It has been agreed that Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

Noted.

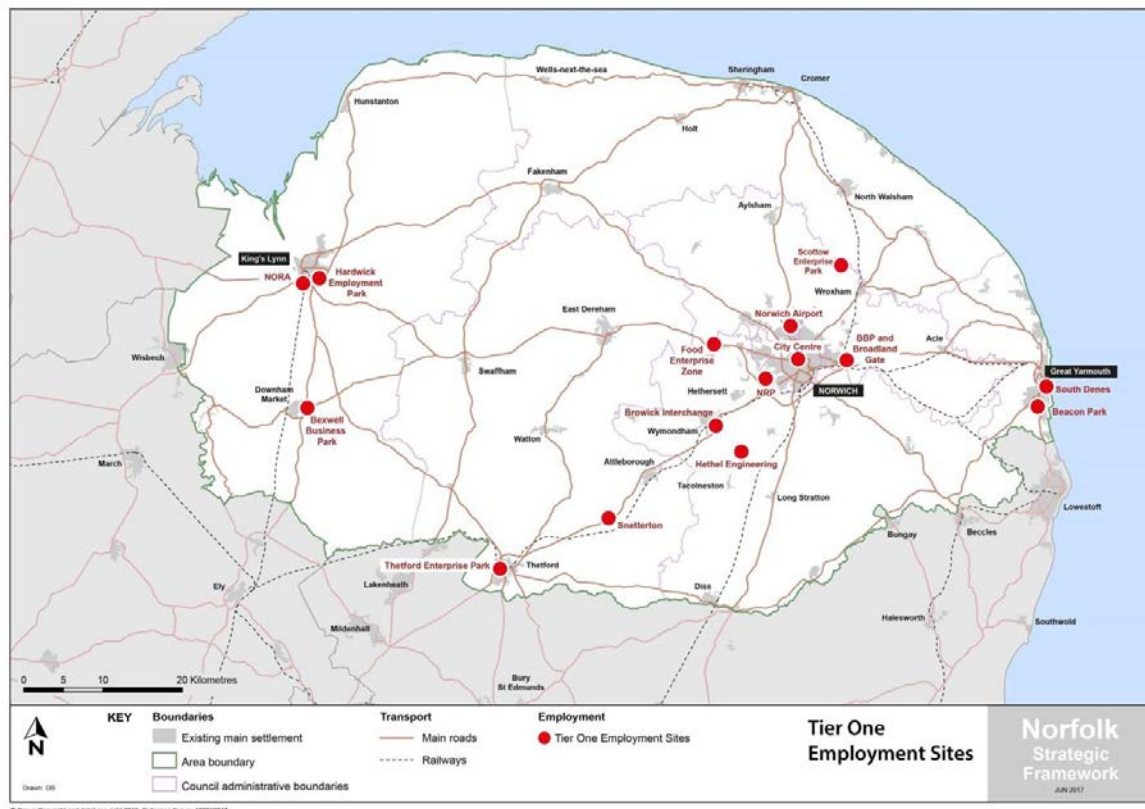
Agreement 6: It has been agreed that Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.

Noted.

Agreement 7: It has been agreed by the authorities that, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

The Broads had produced a Local Plan.

Agreement 8 - It has been agreed by the authorities that, the above list of locations are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses.



Some of these sites are near to the Broads but not within the Broads.

Agreement 9: The emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

The role of Norwich – **part of the Broads is in Norwich. The local plan in general supports and reflects the role of Norwich.**

Cambridge to Norwich Technology Corridor - **not directly relevant to the Broads Local Plan.**

A47 Corridor – **there is a policy in the Local Plan relating to the A47 and this highlights important considerations for any changes to the A47 to address.**

Offshore Energy Sector / Ports of Great Yarmouth & Lowestoft – **Lowestoft and Great Yarmouth Ports and most of offshore energy sector industry are next to or near to the Broads.**

Norfolk Coast, the Broads and the Brecks – **this assessment is about the Local Plan for the Broads.**

A10 corridor – **not directly relevant to the Broads Local Plan.**

Agreement 10: When determining their respective Local Plan housing targets each authority, working together where desirable, will aim to deliver at least Objectively Assessed Need as identified in the most up to date evidence (currently Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.

The Local Plan meets the need (and exceeds the need) for Central Norfolk and Waveney Housing Market Areas. An agreement is in place with Great Yarmouth Borough Council regarding the residual need in that part of the Broads and this is explained in the Housing Topic Paper.

Agreement 11: The Broads Authority will meet its calculated portion of the wider housing need within each of the relevant SHMAs, as far as is compatible with the protection of the Broads' landscape and special qualities. In the event that those constraints result in any shortfall in meeting that portion, South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address that shortfall, as far as is relevant to the Housing Market Area.

The Local Plan meets the need (and exceeds the need) for Central Norfolk and Waveney Housing Market Areas. An agreement is in place with Great Yarmouth Borough Council regarding the residual need in that part of the Broads and this is explained in the Housing Topic Paper.

Agreement 12: South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Noted and welcomed. See Housing Topic Paper.

Agreement 13: In addition to their OAN, Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of 5,228 homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

Noted. That need is being addressed as part of the Greater Norwich Local Plan.

Agreement 14: The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation, working together will ensure that the distribution of provision responds to locally identified needs.

The Norfolk-wide study that looked into Elderly need housing did not break down a need to the Broads Executive Area, as such there is a criteria based policy in the Local Plan. The emerging Gypsy and Traveller and Travelling Show People work indicates no need for sites or pitches in the Executive Area, however the Local Plan does include a criteria based policy to assess such applications. The emerging Houseboat work indicates a need for houseboats/residential moorings in the Local Plan. This is addressed through a combination of allocations and criteria based policy.

Agreement 15: All Local Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

The Broads' HELAA has been produced in line with the agreed methodology.

Agreement 16: To minimise the risk of slow delivery over the next plan period the Norfolk Authorities have agreed that when preparing Local Plans and where it is sustainable to do so:

1. The quantity of homes planned will be increased by a buffer equal to not less than 10% of their OAN requirement, such buffers to be treated as additional supply rather than as part of their housing target.

Taking into account permissions and completions since April 2015 and including the allocations as set out in the Local Plan:

- In Central Norfolk HMA area - 12.9% over provision.
- In GY HMA area - 69% under provision
- In Waveney HMA area - 43.9% over provision
- Across Broads area - 0.7% over provision.

2. Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.

The Local Plan allocates sites from a few dwellings to sites of over 100 dwellings.

3. Require clear evidence and demonstration of ability to deliver development prior to the allocation of larger sites for development.

The Pegasus site has planning permission and work is underway on site. The Utilities Site may be more problematic to deliver, but the landowners are still keen and the site has development potential. In partnership with Norwich City Council, we will work with the landowner.

Agreement 17: To maximise the speed of rollout of 5G telecommunications to Norfolk, the Local Planning Authorities will seek to engage with the telecommunications industry to produce shared guidance on the location of base and booster stations for the 5G network. The aim is to get this guidance agreed before the end of 2018 with it potentially being included in emerging Local Plan documents.

The Local Plan has a policy relating to utilities infrastructure. It emphasises the importance of considering impacts on the Broads landscape and other special qualities.

Agreement 18: The authorities agree to endorse Planning in Health: An Engagement Protocol between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Assuming this is formally agreed it is expected that each Norfolk CCG will formally agree the Protocol via its Governing Body, and NHS England will do via senior officer support.

Following the July Member Forum, a report will be taken to Planning Committee regarding the Planning in Health report.

Agreement 19: The Local Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools.

We have worked with Norfolk County Council regarding education provision in the Broads Executive Area and as stated in the Local Infrastructure Study there is not a need to address specific education needs in this Local Plan.

Agreement 20: In recognition of:

- a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty bring to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; and
- b) the pressure that development in Norfolk could place on these assets
- c) the Local Planning Authorities will work together to produce a GI Strategy for Norfolk by the end of 2017 and ensure that their Local Plans protect and where appropriate enhance these assets.

The Authority is contributing to this work and will address findings in the Local Plan.