

Broads Local Plan – July Bite Size Piece

Report by Planning Policy Officer

Summary: This report introduces the following topics for the Publication version of the Local Plan: Design, Central Norfolk SHMA and the housing topic paper.

Recommendation: Members' views are requested.

1 Introduction

- 1.1 This report introduces the following topics for the Publication version of the Local Plan: Design, Central Norfolk SHMA and the housing topic paper
- 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) Design

This section has been amended following the comments received during the Preferred Options as well as discussions at Planning Committee. The changes are highlighted.

b) Central Norfolk SHMA

The Central Norfolk Strategic Housing Market Assessment (CNSHMA):

- Identifies the total amount of housing needed (Objectively Assessed Need or OAN) in the Housing Market Area (HMA). The Central Norfolk Housing Market Area covers Norwich, Broadland, South Norfolk, North Norfolk and Breckland Council areas.
- This study also calculates the OAN for the Waveney and Great Yarmouth Council parts of the Broads Executive Area.
- Covers the period from 2015 to 2036.

The process for developing OAN is now a demographic process to derive housing need from a consideration of population and household projections. To this, external market and macro-economic constraints

are applied ('Market Signals') in order to embed the need in the real world.

The first CN SHMA was produced in 2016. This 2017 CNSHMA takes into account the 2014 Government household projections and provides an up to date Objectively Assessed Housing need for the Broads Authority.

Figure 81: Projected Dwellings needed for the Broads by Local Authority: policy-off, excluding the City Deal (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

	Breckland	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	Waveney
ORS Model Using Long-term migration trends	0	50	70	3	40	66	57

c) Housing Topic Paper revision

The Housing Topic Paper has been revised to take into account the most recent SHMA. The Topic Paper discusses the findings of the SHMA and sets out how the Objectively Assessed Housing Need for the Broads will be met.

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

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Date of report: 5 July 2017

Appendices: Appendix A – Design
[Appendix B – Central Norfolk SHMA](#)
Appendix C – Housing Topic Paper

1. Design

Policy ~~P08~~**PUBDM40: Design**

All development will be expected to be of a high design quality. Development should integrate effectively with its surroundings, reinforce local distinctiveness and landscape character and preserve or enhance cultural heritage. Innovative designs will be encouraged where appropriate.

Proposals will be assessed to ensure they effectively address the following matters:

- a) **Siting and layout:** The siting and layout of a development must reflect the characteristics of the site in terms of its appearance and function and be an easy to navigate environment.
- b) **Relationship to surroundings and to other development:** Development proposals must complement the character of the local area and reinforce the distinctiveness of the wider Broads setting. In particular, development shall respond to surrounding buildings and the distinctive features or qualities that contribute to the landscape, streetscape and waterscape quality of the local area. Design shall also promote permeability and accessibility by ensuring ease of movement between homes, jobs and services and creating links to public transport services.
- c) **Mix of uses:** To create vitality and interest, proposals should incorporate a mix of uses where possible and appropriate.
- d) **Density, scale, form and massing:** The density, scale, form, massing and height of a development must be appropriate to the local context of the site and to the surrounding landscape/streetscape/waterscape character.
- e) **Appropriate facilities:** Development shall incorporate appropriate waste management and storage facilities, provision for the storage of bicycles and connection to communication networks.
- f) **Detailed design and materials:** The detailing and materials of a building must be of high quality and appropriate to its context. New development should employ sustainable materials, building techniques and technology where appropriate.
- g) **Crime prevention:** The design and layout of development should be safe and secure, with natural surveillance. Measures to reduce the risk of crime and antisocial behaviour must however not be at the expense of overall design quality.
- h) **Adaptability:** Developments shall be capable of adapting to changing circumstances, in terms of occupiers, use and climate change (including change in water level). In particular, dwelling houses should be able to adapt to changing family circumstances or ageing of the occupier in accordance with 'Lifetime Homes' standards and commercial premises should be able to respond to changes in industry or the economic base.
- i) **Flood Risk and Resilience:** Development shall be designed to reduce flood risk but still be of a scale and design appropriate to its Broads setting. Traditional or innovative approaches may be employed to reduce the risks and effects of flooding.
- j) **Biodiversity:** The design and layout of development shall aim to protect, provide for, restore and enhance biodiversity.
- k) **Accessibility:** Applicants are required to consider if it is appropriate for their proposed dwelling/some of the dwellings they propose to be built so they are accessible and adaptable and meet Building Regulation standard M4(2) and M4(3). If applicants do not

consider it appropriate, they need to justify this.

- I) **High quality landscaping.** All proposals shall be designed to respond to and integrate effectively with the landscape character of the area, making a positive contribution through a high quality landscaping scheme as appropriate. All proposals shall be designed are required to consider the A Landscaping Strategy is required to accompany applications for major development and for all other development where new floorspace is proposed which sets out the approach to landscaping which must be appropriate and relate to the location and setting.

Reasoned Justification

Good design is vital for protecting and enhancing the special character of the Broads. It is also essential for achieving truly sustainable development. The design principles set out in this policy provide a high-level design framework for new development that supports the diverse nature of good design. All development proposals should demonstrate compliance with the design principles in the policy. Where development proposals are required to be accompanied by a Design and Access Statement, it should be used to explain how the principles of good design, including the criteria set out in this policy, have been incorporated into the development. The following text elaborates on the criteria included within the policy.

Development proposals are not designed in isolation from their **context**. Although there is considerable variation in local architectural styles, buildings in the Broads are typically of simple construction, often from lightweight materials, and of a scale which blends with their natural surroundings. New development should take account of the characteristics of the site, as well as the distinctiveness of the wider Broads' setting, and make a positive contribution to the surrounding area. The density, scale and mix should be compatible with the character of the local area and avoid adverse impacts of development on views, vistas and skylines. In accordance with the NPPF and NPPG, the Authority considers design to be of great importance and development will not be acceptable if its design is inappropriate in its context, or fails to take opportunities available for improving the character and quality of an area and the way it functions. In the interests of sustainability and good design, it is also important to promote ease of movement, ensuring places are easy to move within and between, and to facilitate ease of movement between places where people live, work and use services and recreation.

Particular attention should be given to details in regard to the **appearance** of development in the Broads landscape. This should take into account the form, mass and scale of a building or structure, reference broads vernacular and local detailing and the texture, colour, pattern and durability of materials used. Materials should aim to conserve and enhance the local identity and distinctiveness of the built environment and landscape character. Non-traditional unsustainable materials will be resisted if they are not considered to be of a high quality material appropriate to their context or able to contribute to local distinctiveness. Many modern materials have a uniform and applied texture which do not weather or soften over time. Individually and cumulatively these materials are considered to erode the distinctive character of the Broads and will become increasingly incongruous in the area. However, it is acknowledged that there will be instances when modern construction methods and design solutions may necessitate the use of other sustainable materials.

Appropriate facilities for users of new development should be integrated effectively into its design and layout to ensure that they can be accessed in a safe and convenient manner and do not detract from the overall appearance of the development. The nature of the facilities will vary depending on the development proposed, but should include waste management and storage facilities to aid recycling, provision for the safe, secure and user friendly storage of bicycles in locations convenient to the cyclist, with good natural or CCTV surveillance to help reduce cycle theft and connection to communication networks (telephone and broadband).

The **safety and security** of the users of new development is an important consideration at an early stage in the design process. The attributes of good design include safer places; well-designed development will create safe, sustainable and attractive places to live and work. It is therefore important that new development is designed to minimise both the opportunity for crime and the perception or fear of crime, while ensuring that other planning and design objectives are not compromised.

With regards to **adaptable** dwellings, the Authority refers to the 16 criteria relating to Lifetime Homes¹. The Authority encourages new housing to be built to the Lifetime Homes standard, which makes it easier for people to remain in their own homes as their mobility needs change, through encouraging homes to be built in a way in which rooms can be used flexibly over time. The criteria in this policy also contribute towards the creation of safe, functional and well-designed communities as aspired to by the Government's Lifetime Neighbourhoods² ambitions.

Assessment of design quality for major applications for residential development will be made using the Building for Life 12³ criteria and applicants will be expected to demonstrate that the scheme positively addresses relevant categories. The Building for Life criteria (see [Appendix H](#)) are reflected in policy **PODMPUBDM40** design and therefore addressing the specific requirements of Building for Life will contribute towards meeting the requirements of this policy.

The Authority also encourages the provision of some dwellings, in appropriate locations, to be designed to be **accessible** and accommodate wheelchairs. The details are set out in the Building Regulations part M⁴. The Census 2011 shows that the Broads Authority Executive Area has an ageing population and older people could benefit from more accessible dwellings. The NPPG⁵ is clear, however, in saying that *'Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the*

¹ Lifetime Homes Standards Homes that are accessible to everybody and where the layout can be easily adapted to meet the needs of future occupants. <http://www.lifetimehomes.org.uk/>

² <https://www.gov.uk/government/publications/lifetime-neighbourhoods--2>

³ <http://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition>

⁴

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506503/BR_PDF_AD_M1_2015_with_20_16_amendments_V3.pdf

⁵ <http://planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/accessibility-and-wheelchair-housing-standards/>

Optional Requirements in Part M should be applied'. The Authority acknowledges that this standard may not be appropriate in some locations or for some schemes, but applicants are required to justify reasons for not including dwellings that are accessible and adaptable.

Easy to navigate environments can help disabled people, people with site loss and **people with dementia**. There are many guides that can help design better environments:

- BS 8300: 2009+A1:2010⁶ looks at the design of buildings and their ability to meet the requirements of disabled people.
- The RTPI have produced DEMENTIA AND TOWN PLANNING (2017)⁷
- **Neighbourhoods for Life Designing dementia-friendly outdoor environments**⁸

In relation to the layout of the development, it is important that proposals are able to accommodate access by **emergency service vehicles and waste disposal vehicles**. **Turning to considerations relating to the Fire Service in particular, sprinklers are encouraged in developments and the requirements to include fire hydrants and hard standings for firefighting are judged on a case by case basis and may be a planning condition.**

Landscaping is part of the design response to mitigate and/or enhance a proposal. Some types and forms of hard surfaces and structures or soft landscaping (planting) can have biodiversity, amenity and recreation benefits and are more appropriate in the Broads Executive Area than others. What is suitable on a site would reflect the location and setting. The landscaping design proposals should reflect the key positive characteristics of the locality and its setting. **As a minimum, all proposals that are deemed to have a landscape impact will be accompanied by a Landscaping Strategy. The detailed landscaping scheme and management plan will be conditioned should permission be granted. It may be prudent for some schemes to provide the landscaping scheme and management plan as part of the application rather than using the two stage approach. The size of the scheme may determine this. See the **xxxxx** guide for more details**⁹.

~~Development proposals should normally be accompanied by:~~

- ~~• An ecological and topographical surveys as required by the nature and scale of the proposal;~~
- ~~• A landscaping scheme that details new planting and including, when appropriate, replacement trees of a value commensurate or greater to that which is lost, boundary treatments, external structures and proposals for ecological enhancement;~~
- ~~• An arboricultural assessment detailing the measures to be put in place to protect trees and hedgerows during construction works and providing justification for the removal of any trees or hedgerow;~~
- ~~• Details of landscaping management and maintenance arrangements; and~~

~~Landscaping proposals, both hard and soft, should normally form an integral part of development proposals. The Authority will, however, seek appropriate conditions and/or planning obligations to~~

⁶ Design of buildings and their approaches to meet the needs of disabled people. Code of practice <http://shop.bsigroup.com/ProductDetail/?pid=000000000030217421>

⁷ http://rtpi.org.uk/media/2210154/dementia_and_town_planning_final.pdf

⁸ http://www.idgo.ac.uk/about_idgo/docs/NfL-FL.pdf

⁹ **Please see landscaping guide xxxxxxxx**

~~secure the implementation of landscaping schemes and the replacement of trees, hedgerows or other natural features or their protection during the course of development. Payment for the maintenance and management of new landscaping may be sought and controlled via a planning obligation. On certain schemes the submission of a landscaping strategy would be acceptable with the detailed landscaping proposals conditioned.~~

~~Landscaping proposals, in particular those involving hard landscaping, should ensure that they do not damage geodiversity and geological conservation interests. Proposals should aim to maintain, and enhance, restore or add to geodiversity and wherever possible incorporate geological features within the design.~~

When designing new development, consideration should also be given to the design implications set out in **other policies in this plan**. Of particular relevance are the policies on: Landscape and Trees; Water Quality and Resources; Historic Environment; Energy Generation and Efficiency; Accessibility on Land; Accessibility to Water; Amenity and Development on Sites with a High Probability of Flooding; land raising; disposal of excavated material. Regard should also be had to the Biodiversity Enhancements Guide and the Planning for Waterside Properties Guide.

Evidence used to inform this section

- The policy is rolled forward from the Development Management DPD.
- Amendments reflect officer experience.
- Lifetime Homes
- Building for Life

Monitoring Indicators

- Schemes permitted contrary to design expert advice.



Broads Local Plan 2036

Housing topic paper

~~August 2016~~ Revised July 2017

1. Introduction

In accordance with the NPPF requirements, the Broads Authority has worked with neighbouring Councils and has calculated the Objectively Assessed Housing Need (OAN) for the Broads Authority Executive Area. This Topic Paper discusses the OAN and how the Broads Authority will ensure the need is met.

2. About the Broads Authority Executive Area

The boundary of the Broads Authority's Executive Area is drawn tightly to the river valleys of the Rivers Ant, Bure, Chet, Thurne, Waveney and Yare and corresponds broadly to the flood plains of those rivers. It covers parts of the two counties of Norfolk and Suffolk and parts of four different district council areas – Broadland, North Norfolk, South Norfolk and Waveney and well as parts of the borough of Great Yarmouth and the city of Norwich. There is not one single parish which lies wholly within the Broads area and all are split with the relevant district or other council.

3. Central Norfolk Strategic Housing Market Assessment 2017

Opinion Research Services (ORS) was jointly commissioned by the Central Norfolk local authorities (Norwich City, Broadland, Breckland, North Norfolk and South Norfolk, together with the Broads Authority) in 2017 to identify the functional Housing Market Areas (HMAs) covered by the five local authorities, in particular to establish the extent of the Central Norfolk HMA.

The study adheres to the requirements of the National Planning Policy Framework published in 2012 and Planning Practice Guidance (March 2014). The methodology was also mindful of emerging good practice and outcomes from Examinations, as well as the Technical Advice Note about Objectively Assessed Need and Housing Targets that was published by the Planning Advisory Service (PAS) in June 2014. The methodology was based on secondary data, and sought to:

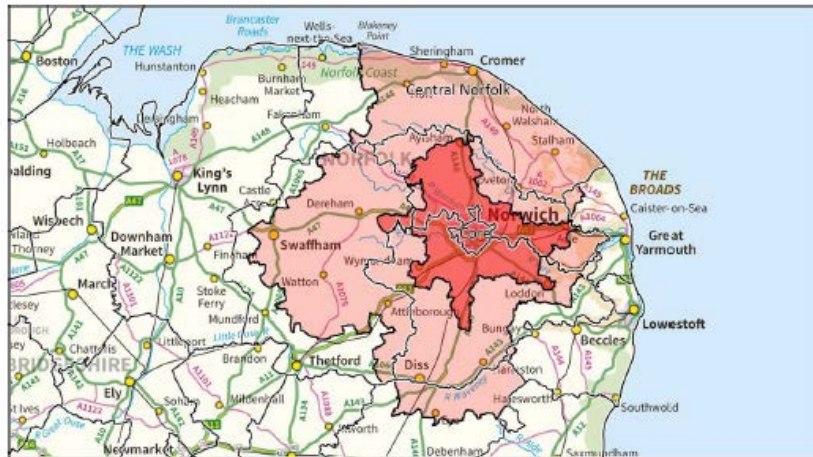
- Define the housing market area(s);
- Provide evidence of the need and demand for housing based on demographic projections;
- Consider market signals about the balance between demand for and supply of dwellings;
- Establish the Objectively Assessed Need for housing;
- Identify the appropriate balance between market and affordable housing; and
- Address the needs for all types of housing, including the private rented sector, people wishing to build their own home, family housing, housing for older people and households with specific needs.

The identification of the Housing Market Area (HMA) is the first relevant building block in the evidence for identifying OAN for the study. ~~A three-stage HMA~~ The following was identified for the Central Norfolk SHMA:

- Norwich Policy Area (NPA) – a longstanding policy construct previous used by the Greater Norwich authorities in the JCS and illustrated in Figure 2.
- Core Market Area – the area with the strongest functional connection to the Norwich Urban Area; illustrated in Figure 1. The Core Market Area has a strong similarity to the Norwich Policy Area (except the settlements of Acle, Aylsham and Loddon).

- Greater Norwich – All of Norwich, Broadland and South Norfolk and an area over which joint planning takes place; illustrated in Figure 1.
- Functional HMA – established as a result of the previous SHMA including all of Norwich City and Broadland administrative areas, most of South Norfolk, Breckland and North Norfolk, a part of Mid Suffolk and very small parts of Great Yarmouth BC and Waveney District.
- Central Norfolk HMA – The functional HMA best fit to District boundaries i.e. all of Norwich, Broadland, South Norfolk, Breckland and North Norfolk: illustrated in Figure 1.

Figure 1: Housing Market Area in and around Greater Norwich [Source: UK Census of Population 2001 combined with DEFRA Classifications]



Source: Central Norfolk Strategic Housing Market Assessment (ORS [2015/2017](#)).

The SHMA has identified a substantial need for additional affordable housing: a total of 17,450 dwellings across Central Norfolk over the 21-year period 2015-36.
~~The study concludes that providing that 31.85% of housing was delivered to meet affordable housing need then this would cover both current and future projected needs for affordable housing, so there would be no need to increase overall housing provision.~~

The following table shows the total OAN for the entire Central Norfolk SHMA.

It should be noted that data relevant to the calculations that produce the OAN is regularly updated. As such, the Authority will work with relevant Councils to ensure that the SHMA and OAN is updated. ~~Indeed at the time of writing, discussions were ongoing with regards to updating the OAN before the end of 2016. Any update will inform the publication version of the Local Plan.~~

Figure 82: Projected Dwellings needed for Different Sub-Geographies (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

	Core	NPA	Greater Norwich	The Broads	5 LA Total
Demographic starting point: CLG household projections 2015-36	25,660	25,380	32,823	-	51,707
Baseline household projections taking account of local circumstances	26,968	26,675	34,501	195	51,835
Allowance for transactional vacancies and second homes: based on dwellings without a usually resident household	1,144	1,137	1,396	66	3,019
Dwellings	28,112	27,812	35,897	261	54,854
Adjustment for suppressed household formation rates: concealed families and homeless households	355 + 14 = 370	344 + 14 = 358	439 + 17 = 456	9 + 3 = 12	895 + 58 = 953
Baseline housing need based on demographic projections	28,482	28,170	36,353	273	55,807
Further adjustments needed...	In response to balancing jobs and workers:	0	0	0	0
	In response to market signals	2,811 – 370 = 2,441	2781 – 358 = 2,423	3,589 – 456 = 3,133	26 – 12 = 14
Combined impact of the identified adjustments	2,441	2,423	3,133	14	4,532
Full Objectively Assessed Need for Housing 2015-36	30,923	30,593	39,486	287	60,339

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4. The Broads OAN

The Central Norfolk SHMA says: 'The Broads are not included in any official population or household projections, but it was possible to estimate the indigenous change to the population and the net migration to the area to obtain population projections. Migration statistics have been calculated from the published data at a net 37 persons per year. The population projections can then be converted to household projections by using the weighted average headship rates for the Central Norfolk area'.

If the Broads had a typical age profile and migration patterns as the rest of Central Norfolk its OAN would be around 1.0% of its existing dwelling stock per annum, which would represent a figure of around 30 dwellings per annum. However the projected dwelling requirement for the Broads is 295 for the period 2012-36 using long-term migration trends and 320 using jobs growth forecasts. The key driver behind these low figures is that the population profile of the Broads is older which gives

¹ Please note that this table says 287, but the following table says 286. This is an error in the report. The Authority's figures are those set out in the table which states the OAN for each part of the Broads (Figure 81), so 286 dwellings.

more deaths and fewer household formations. Given the ageing population this will generate a net population growth of around 25 persons per annum who need around 13 dwellings per annum. They are very low numbers, but reflect the age profile of the population.

'If the Broads had a typical age profile and migration patterns as the rest of Central Norfolk we would expect its OAN to be around 1.0% of its existing dwelling stock per annum, which would represent a figure of around 30 dwelling per annum. However, as is shown in Figure 81 the projected dwelling requirement for the Broads is 287 for the period 2015-36 using long-term migration trends. This includes a very high second and holiday home rate of 25.4% to reflect the known high rates of vacant homes in the Broads Authority area. When dealing with low figures such as these, a small change will have a relatively large impact'.

'The key driver behind these low figures is that the population profile of the Broads is older which gives more deaths and fewer household formations. Given the ageing population this will generate a net population growth of around 25 people per annum who need around 12 dwellings per annum. They are very low numbers, but reflect the age profile of the population'.

Figure 81: Projected Dwellings needed for the Broads by Local Authority (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

	Breckland	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	Waveney
ORS Model Using Long-term migration trends	0	50	70	3	40	66	57

The detailed methodology for calculating the OAN for the Broads can be found at Appendix C.

5. Meeting the Objectively Assessed Housing Need

The table below shows completions, permissions and allocations since April ~~2012~~2015. It has been updated to reflect the 2015~~6~~/16~~7~~ monitoring data. It shows that ~~178-55~~ dwellings have been completed, that 87 dwellings have been permitted but not delivered and there are allocations for ~~213-146~~ units (excluding those that are both permitted and continue to be allocated).

Taking the entire Local Planning Authority Area as a whole, the table shows that as at June ~~2016~~2017, the Authority has over provided by ~~71-2~~ dwellings with ~~20-19~~ years left to go in the plan period.

Taking the three Housing Market Areas individually, the table shows that the housing need has been exceeded in Central Norfolk and Waveney Housing Market Areas but there is a residual need in the Great Yarmouth Housing Market Area of 44 dwellings.

Of interest is the Housing Trajectory which is included at Appendix B which shows when sites could be delivered.

Linked to this Topic Paper is the Broads Housing and Economic Land Availability Assessment which can be found at <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2> (to follow at the August Planning Committee).

Broadland	0	0	0	1	1	0	0	0	4	4	163	105	-		21	Claw back at Ditchingham plus any provided on the Utilities Site.
North Norfolk	0	0	0	0	0	0	0	0	0	0			-	Waterside Rooms, Hoveton - assume 6		
Norwich	0	0	0	0	0	0	0	0	0	0			Utilities site - assume 120	[Utilities Site]		
South Norfolk	52	0	0	0	52	0	0	0	1	1			-			
Great Yarmouth	1	0	0	0	1	1	0	0	0	1	66	64	Hedera House, Thurne - assume 16	[Thurne] Stokesby - assume 4	-44	None provided.
Waveney	1	0	0	0	1	80	0	0	1	81	57	-25	[Pegasus which is counted in the permissions section]	[Pegasus which is counted in the permissions section]	25	Claw back at Pegasus.
	54	0	0	1	55	81	0	0	6	87	286	144			2	
Note that the plan period is to 2036. This table reflects the situation as at April 2017.																
? - Broadland DC do not monitor completions on the Broads part of their district. The BA started monitoring this in 2015.																
* - as calculated in Central Norfolk SHMA 2017																
~ - as allocated in the Broads Authority Sites Specifics Local Plan 2014																
# - green means over provision and red means residual need																
\$ - Brackets show site rolled forward from 2014 Sites Specifics Local Plan. Stokesby and Waterside Room are additional sites allocated.																
													In Central Norfolk HMA area - 12.9% over provision.	146		
													In GY HMA area - 69% under provision			
													In Waveney HMA area - 43.9% over provision			
													Across Broads area - 0.7% over provision.			

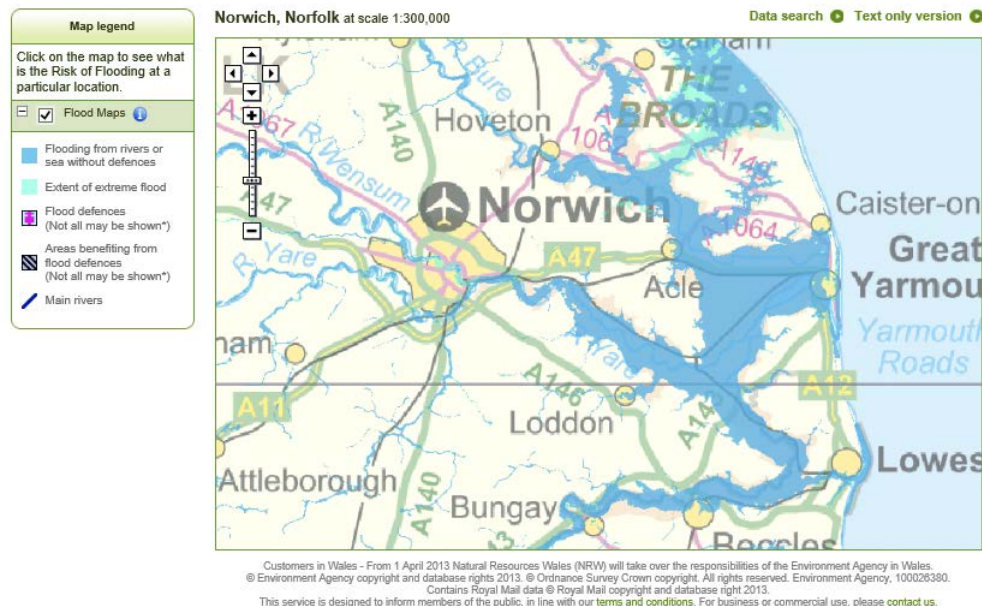
6. About the Broads

The Local Plan lists the following special qualities of the Broads. This list is based on the qualities set out in the Broads Climate Change Adaptation Plan and Landscape Character Assessment. These special qualities are the reasons why the Broads is designated as an equivalent to a National Park. The following considerations which are assets to the Broads, tend to be constraints to development in the Broads.

- Rivers and open water bodies ('broads')
- Fens, reed beds and wet woodlands
- Grazing marshes and ditches
- Flood plains, estuary and coast
- Navigable, lock-free waterways
- Special wildlife
- Countryside access on land and water
- Views, remoteness, tranquillity, wildness and 'big skies'
- The people, the visitors, the activities
- History: geoheritage, cultural heritage, skills, archaeology, traditions, historic structures
- People's interactions with the landscape
- The settlements
- Variety of patterns and textures of the landscape.

Some aspects are discussed in more detail below.

The boundary of the designated Broads area generally follows the extent of the flood plain of the area's rivers, so most of it is at serious risk of **flooding**. Over 80% of the area is in flood risk zone 3 (according to both the Broads SFRA and the EA flood risk maps). National planning policy in relation to development and flood risk has tightened considerably in recent years. The following map shows flood risk in the Broads².



Water quality in the Broads is critical to the area's value for wildlife, and to its appeal for recreation and navigation. The NPPF and Broads Core Strategy emphasise the importance of enhancement of the natural environment and avoidance of water pollution.

The Broads is a **biodiversity** resource of international importance: a mosaic of shallow lakes (broads), reedbeds and fens, grazing marshes, heath and grassland, wet woodland, estuary and coast. These habitats support numerous

² Taken from the Environment Agency website: <http://www.environment-agency.gov.uk/homeandleisure/37793.aspx>

species of conservation, including fen orchid, holly-leaved naiad, water vole, brown hare and bittern. The maps below show the habitats in the Broads³ as well as International Designations.

The Norfolk and Suffolk Broads is renowned as the UK's premier wetland, a unique and globally important **landscape** shaped and nurtured by its inhabitants since at least Roman times. Encompassing an area of 303km², the Broads sits between the peripheral urban areas of Norwich, Great Yarmouth and Lowestoft, with a short coastal strip at Winterton and an estuary at Breydon Water. The low-lying, mainly open and undeveloped landscape of the Broads comprises an interconnected wetland mosaic of rivers, broads, fens, marshes and woodland rich in rare habitats and species, some of which are unique to the area.

7. National Policy

The NPPF says the following in relation to objectively assessed needs, housing market areas and the Broads:

14. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or – specific policies in this Framework indicate development should be restricted.⁹

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.

47. To boost significantly the supply of housing, 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*

115: Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

The National Parks Circular (2010)⁴ refers to the need for National Park Authorities (including the Broads Authority) to meet local housing needs and in particular affordable housing, but states that the areas are not suitable for unrestrained housing.

8. Meeting the residual Housing Need of the Broads

The Broads Authority will not undertake a call for sites to seek to address the 44 dwelling residual need (2.2-3 per year to 2036) in the Great Yarmouth Housing Market Area. Instead, through the Duty to Cooperate, Great Yarmouth Borough Council has ~~offered~~ agreed to meet the 44 dwelling residual need within their area of the Borough. The Broads Authority accepts this offer from Great Yarmouth Borough Council. Any dwellings completed in the Broads part of the Borough will be counted by the Borough Council towards their need/target.

There are three key reasons for not undertaking a call for sites and not seeking to meet the 44 dwelling residual need in the Great Yarmouth Housing Market Area:

- a) **We have over provided in the delivery of dwellings in the entire Broads Authority Executive Area ~~by 71 dwellings~~ as at 2016⁷ with 20-19 years left in the plan period.**

The previous table shows the completions and allocations to date and how this relates to the different Housing Market Areas and overall need. Whilst the need may not be met in each of the three Housing Market Areas, the

³ Taken from the Broads Authority Biodiversity Action Plan Framework Document 2009.

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

Authority considers that the completions, permissions and allocations provide significant housing in an extremely constrained area.

b) The part of the Broads within the Borough of Great Yarmouth is particularly constrained.

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.

b)c) Great Yarmouth Borough Council has ~~offered~~ agreed to meet the housing need for the entire Borough outside of the Broads to protect the special qualities of the Broads.

GYBC, 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 GY Borough, including that part within the Broads, in their assessment of the Borough's housing needs. 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.

It is important to note also that ~~We~~ we are considering development proposals through the planning application process for brownfield sites in three areas of the Borough of Great Yarmouth. Whilst there is no guarantee that there will be dwellings permitted on this site, there could be up to 25 dwellings provided through this route, in advance of the Local Plan, but delivered in an acceptable way for the protected landscape of the Broads. ~~The figure of 25 includes a potential Gypsy and Traveller site which could help GYBC meet their identified need of 10 pitches.~~

9. Opinions of our constituent districts

This approach was shared with our six constituent districts in summer 2016. Four authorities considered the approach was fair and reasonable. Two districts however raised some comments.

Norwich City Council queried the delivery of affordable housing and Broadland Council queried if GYBC taking the Authority's residual need, without the Broads Authority undertaking a call for sites was sound and expressed concern that GYBC might in turn not be able to meet its own housing need and thus seek to pass it on to Broadland Council.

With regard to affordable housing, it is anticipated that some affordable housing will come forward through the Utilities Site allocation. ~~Indeed the planning application that is being determined as at August 2016 included 40 affordable dwellings (33% affordable housing).~~ The Pegasus scheme has planning permission, but will be rolled forward is an allocation in the new Local Plan (but not double counted) as it has not been built out yet. That scheme does not have any affordable housing on site as the promoters' assessment concluded that it is not viable, but there is a clawback provision in place – this could deliver some affordable housing.

Going forward however delivery of affordable housing is looking extremely unlikely in the Broads. For planning purposes, the Broads is not a National Park and therefore the threshold as set by Government, above which development needs to provide affordable housing is more than ten.

According to the Planning Application software used by the Broads Authority, over the last ten years a total of 142 planning applications for dwellings have been received. Some have been withdrawn, some approved and some refused. But 142 applications have been received. These applications amount to 585 dwellings in total. 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.

If we presume that this trend will continue, the size of a typical housing application in the Broads that could come forward as windfall will not meet the threshold for affordable housing.

Looking at land owned by the Broads Authority, the size and location of the land as well as its current land use does not lend itself to being appropriately developed for affordable housing. So the Authority is not in a position to build affordable houses itself.

There is scope for the Authority to increase its housing target above the Objectively Assessed Housing Need to seek further affordable housing delivery. However the sites would need to be able to accommodate over 10 dwellings and have no unexpected costs in able order to require affordable housing successfully and not be at risk as a result of viability of the scheme. Furthermore the Authority has already over provided in relation to its entire housing target ~~by 22%~~ with ~~20-19~~ years left in the plan period. There is also the special qualities of the nationally important and designated landscape that restrains development.

In relation to the issue of not completing a call for sites to seek to meet the residual need in GYBC the reasons for this are set out in section 8 and the Authority considers these reasons to be reasonable.

~~On the issue of GYBC potentially passing on the need that they cannot meet to Broadland Council, it should be noted that as at June 2016 the Broads Authority had over delivered on its housing need in the Central Norfolk Housing Market Area (which includes Broadland Council) by 89 dwellings so in theory the 89 dwellings could be subtracted from the Central Norfolk SHMA OAN which could effectively mean that GYBC could ask the Central Norfolk Authorities to take up to 89 of their dwellings with no impact on the current housing targets or OAN of the Central Norfolk Authorities. So if GYBC did then pass on the 44 dwellings that they offered to deliver for the Broads Authority to the Central Norfolk Authorities, the Broads Authority has already delivered these. If more than 44 dwellings are 'passed on' then the extra number of dwellings have not come about as a result of the Broads.~~

10. Conclusion

The Broads Authority will not undertake a call for sites to seek to address the 44 dwelling residual need (2.2-3 per year to 2036) in the Great Yarmouth Housing Market Area for the following reasons:

- i) We have over provided in the delivery of dwellings in the entire Broads Authority Executive Area ~~by 71 dwellings~~ as at 2016~~7~~ with ~~1920~~ years left in the plan period.
- ii) There are less constrained sites elsewhere in the Borough where it is more prudent to deliver residential dwellings.
- iii) Great Yarmouth Borough Council has offered agreed to meet the housing need for the entire Borough outside of the Broads to protect the special qualities of the Broads.

Of note, W~~w~~e are considering development proposals through the planning application process for brownfield sites in three areas of the Borough of Great Yarmouth.

Instead, through the Duty to Cooperate, Great Yarmouth Borough Council has offered agreed to meet the 44 dwelling residual need within their area of the Borough. The Broads Authority accepts this offer from Great Yarmouth Borough Council. Any dwellings completed in the Broads part of the Borough will be counted by the Borough Council towards their need/target.

Appendix A: Applications for dwellings ~~over last ten years~~for the ten years leading up to June 2016

The following table shows the number of applications for dwellings over the last ten years. These are all the applications received, whether they are approved, withdrawn or refused. It may also be the case that the same scheme appears a number of times. The aim is to show the average size of application received at the Broads Authority.

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.

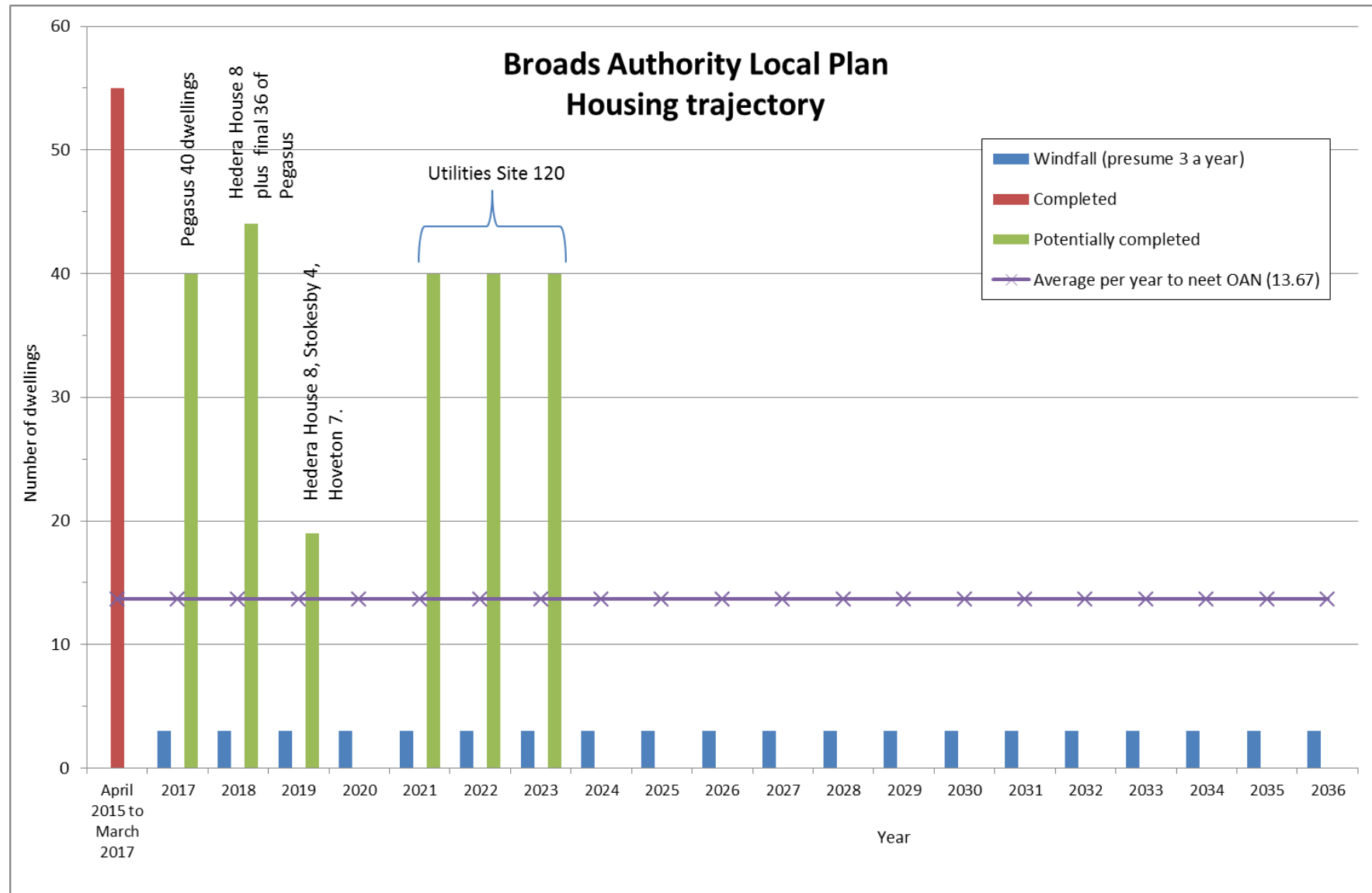
Application Number	Settlement	Decision	District	Number of dwellings
BA/2013/0132/OUT	Irstead	APCON	North Norfolk District Council	1
BA/2016/0200/OUT	Irstead	APCON	North Norfolk District Council	1
BA/2007/0311/FUL	St Olaves	WDN	Great Yarmouth	1
BA/2008/0015/FUL	St Olaves	REF	South Norfolk District Council	1
BA/2008/0064/FUL	Lowestoft	REF	Waveney District Council	1
BA/2008/0092/FUL	Bramerton	APCON	South Norfolk District Council	1
BA/2008/0107/FUL	Haddiscoe	REF	South Norfolk District Council	1
BA/2008/0124/FUL	Irstead	APCON	North Norfolk District Council	1
BA/2008/0155/FUL	Horning	APCON	North Norfolk District Council	1
BA/2008/0174/OUT	West Somerton	REF	Great Yarmouth Borough Council	1
BA/2008/0272/FUL	Lowestoft	WDN	Waveney District Council	1
BA/2008/0277/FUL	Wroxham	APCON	Broadland District Council	1
BA/2008/0284/FUL	Horning	APCON	North Norfolk District Council	1
BA/2008/0304/FUL	Lowestoft	APCON	Waveney District Council	1
BA/2008/0320/FUL	Brundall	WDN	Broadland District Council	1
BA/2008/0339/FUL	Lowestoft	WDN	Waveney District Council	1
BA/2008/0375/FUL	Burgh Castle	REF	Great Yarmouth Borough Council	1
BA/2008/0386/FUL	Lowestoft	REF	Waveney District Council	1
BA/2009/0050/FUL	Horning	REF	North Norfolk District Council	1
BA/2009/0062/FUL	Lowestoft	APCON	Waveney District Council	1
BA/2009/0081/FUL	Horning	APCON	North Norfolk District Council	1
BA/2009/0139/FUL	Acle	APCON	Broadland District Council	1
BA/2009/0147/FUL	Brundall	APCON	Broadland District Council	1
BA/2009/0158/FUL	Horning	WDN	North Norfolk District Council	1
BA/2009/0196/FUL	Hardley	REF	South Norfolk District Council	1
BA/2009/0200/FUL	Ludham	APCON	North Norfolk District Council	1
BA/2009/0206/FUL	Thorpe St Andrew	APCON	Broadland District Council	1
BA/2009/0215/FUL	Burgh Castle	REF	Great Yarmouth Borough Council	1
BA/2009/0234/FUL	Horning	APCON	North Norfolk District Council	1
BA/2009/0245/FUL	Thurne	APCON	Great Yarmouth Borough Council	1
BA/2009/0258/FUL	Lowestoft	WDN	Waveney District Council	1
BA/2009/0259/FUL	Ashby With Oby	APCON	Great Yarmouth Borough Council	1
BA/2009/0295/EXT8W	Oulton Broad	APCON	Waveney District Council	1
BA/2009/0330/FUL	Hoveton	APCON	North Norfolk District Council	1
BA/2010/0081/FUL	Brundall	APCON	Broadland District Council	1

Application Number	Settlement	Decision	District	Number of dwellings
BA/2010/0113/FUL	Repps With Bastwick	REF	Great Yarmouth Borough Council	1
BA/2010/0122/FUL	Brundall	REF	Broadland District Council	1
BA/2010/0151/FUL	Horning	APCON	North Norfolk District Council	1
BA/2010/0198/FUL	Hoveton	REF	North Norfolk District Council	1
BA/2010/0257/FUL	Horning	WDN	North Norfolk District Council	1
BA/2010/0268/FUL	West Somerton	APCON	Great Yarmouth Borough Council	1
BA/2010/0306/FUL	Hoveton	APCON	North Norfolk District Council	1
BA/2010/0307/FUL	Horning	APS106	North Norfolk District Council	1
BA/2010/0390/FUL	Horning	WDN	North Norfolk District Council	1
BA/2010/0412/COND	Irstead	APCON	North Norfolk District Council	1
BA/2010/0424/FUL	Burgh Castle	APCON	Great Yarmouth Borough Council	1
BA/2010/0431/FUL	Stokesby With Herringby	APCON	Great Yarmouth Borough Council	1
BA/2010/0432/LBC	Stokesby With Herringby	APCON	Great Yarmouth Borough Council	1
BA/2010/0433/OUT	Mettingham	REF	Waveney District Council	1
BA/2011/0005/FUL	Acle	APCON	Broadland District Council	1
BA/2011/0065/FUL	Wroxham	APCON	Broadland District Council	1
BA/2011/0080/FUL	Aldeby	APCON	South Norfolk District Council	1
BA/2011/0087/FUL	Horning	WDN	North Norfolk District Council	1
BA/2011/0095/FUL	South Walsham	APCON	Broadland District Council	1
BA/2011/0172/FUL	Repps With Bastwick	APS106	Great Yarmouth Borough Council	1
BA/2011/0199/FUL	Thorpe St Andrew	WDN	Broadland District Council	1
BA/2011/0205/FUL	Cantley	APCON	Broadland District Council	1
BA/2011/0232/FUL	Limpenhoe	WDN	Broadland District Council	1
BA/2011/0240/FUL	Burgh Castle	APCON	Great Yarmouth Borough Council	1
BA/2011/0256/FUL	Horning	APCON	North Norfolk District Council	1
BA/2011/0263/COND	Horning	APS106	North Norfolk District Council	1
BA/2011/0273/COND	Hoveton	APCON	North Norfolk District Council	1
BA/2011/0275/FUL	Haddiscoe	REF	South Norfolk District Council	1
BA/2011/0295/COND	Irstead	APCON	North Norfolk District Council	1
BA/2011/0296/FUL	Thorpe St Andrew	APCON	Broadland District Council	1
BA/2011/0306/FUL	Haddiscoe	REF	South Norfolk District Council	1
BA/2011/0358/CLUED	Repps With Bastwick	NONAPP	Great Yarmouth Borough Council	1
BA/2011/0378/COND	Dilham	APCON	North Norfolk District Council	1
BA/2011/0382/FUL	Lowestoft	APCON	Waveney District Council	1
BA/2011/0409/OUT	Mettingham	APS106	Waveney District Council	1
BA/2012/0050/FUL	Thorpe St Andrew	APCON	Broadland District Council	1
BA/2012/0083/FUL	Hoveton	APCON	North Norfolk District Council	1
BA/2012/0090/FUL	Cantley	APCON	Broadland District Council	1
BA/2012/0125/FUL	Acle	APCON	Broadland District Council	1
BA/2012/0164/FUL	Horning	REF	North Norfolk District Council	1
BA/2012/0235/FUL	Stalham	APCON	North Norfolk District Council	1
BA/2012/0239/FUL	Wayford Bridge	APCON	North Norfolk District Council	1
BA/2012/0281/FUL	Filby	WDN	Great Yarmouth Borough Council	1
BA/2012/0327/FUL	Filby	REF	Great Yarmouth Borough Council	1
BA/2012/0330/CLUED	Thorpe St Andrew	CLUEDN	Broadland District Council	1
BA/2012/0331/FUL	Acle	APCON	Broadland District Council	1
BA/2012/0333/FUL	Stalham	WDN	North Norfolk District Council	1

Application Number	Settlement	Decision	District	Number of dwellings
BA/2012/0394/FUL	Brundall	APCON	Broadland District Council	1
BA/2013/0105/COND	Burgh Castle	APCON	Great Yarmouth Borough Council	1
BA/2013/0135/FUL	Wroxham	APCON	Broadland District Council	1
BA/2013/0153/FUL	Filby	WDN	Great Yarmouth Borough Council	1
BA/2013/0156/FUL	Horning	APCON	North Norfolk District Council	1
BA/2013/0227/FUL	Horning	REF	North Norfolk District Council	1
BA/2013/0266/FUL	Filby	REF	Great Yarmouth Borough Council	1
BA/2013/0322/FUL	Horning	APCON	North Norfolk District Council	1
BA/2013/0402/OUT	Reedham	APCON	Broadland District Council	1
BA/2013/0404/FUL	Oulton	APCON	Waveney District Council	1
BA/2014/0041/CLUED	Thorpe St Andrew	CLUEDI	Broadland District Council	1
BA/2014/0108/FUL	Norton Subcourse	WDN	South Norfolk District Council	1
BA/2014/0154/FUL	Norton Subcourse	REF	: South Norfolk District Council	1
BA/2014/0343/OUT	Potter Heigham	REF	North Norfolk District Council	1
BA/2015/0148/FUL	Ludham	APCON	North Norfolk District Council	1
BA/2015/0170/FUL	Burgh Castle		Great Yarmouth Borough Council	1
BA/2015/0183/COND	Horning	APCON	North Norfolk District Council	1
BA/2015/0290/FUL	Mettingham	WDN	Waveney District Council	1
BA/2015/0352/FUL	Cantley	REF	Broadland District Council	1
BA/2015/0368/FUL	Burgh Castle	REF	Great Yarmouth Borough Council	1
BA/2016/0001/FUL	South Walsham	RET	Broadland District Council	1
BA/2016/0026/COND	Brundall	REF	Broadland District Council	1
BA/2016/0065/FUL	Runham	APCON	Great Yarmouth Borough Council	1
BA/2016/0069/COND	Hoveton	WDN	North Norfolk District Council	1
BA/2016/0080/FUL	Rockland St Mary	WDN	South Norfolk District Council	1
BA/2016/0184/FUL	Hoveton		North Norfolk District Council	1
BA/2016/0265/FUL	Rockland St Mary		South Norfolk District Council	1
BA/2016/0276/FUL	Lowestoft		Waveney District Council	1
BA/2016/0298/FUL	Kirby Bedon	RET	South Norfolk District Council	1
BA/2008/0158/FUL	Beccles	APCON	Waveney District Council	2
BA/2009/0252/FUL	Chedgrave	WDN	South Norfolk District Council	2
BA/2010/0124/FUL	Gillingham	APCON	South Norfolk District Council	2
BA/2010/0295/FUL	Ormesby St Michael	APCON	Great Yarmouth Borough Council	2
BA/2011/0161/FUL	Horning	APCON	North Norfolk District Council	2
BA/2012/0344/FUL	Loddon	APCON	South Norfolk District Council	2
BA/2015/0246/FUL	Claxton	APCON	South Norfolk District Council	2
BA/2008/0172/FUL	Stokesby	APCON	Great Yarmouth Borough Council	3
BA/2008/0345/FUL	Cantley	APCON	Broadland District Council	3
BA/2009/0257/OUT	Filby	APCON	Great Yarmouth Borough Council	3
BA/2012/0006/REM	Filby	WDN	Great Yarmouth Borough Council	3
BA/2012/0213/REM	Filby	APCON	Great Yarmouth Borough Council	3
BA/2013/0019/FUL	Wroxham	APCON	Broadland District Council	3
BA/2015/0123/FUL	Chedgrave	WDN	South Norfolk District Council	3
BA/2015/0381/FUL	Wroxham	APCON	Broadland District Council	3
BA/2008/0016/FUL	St Olaves	REF	South Norfolk District Council	4
BA/2008/0342/OUT	Filby	REF	Great Yarmouth Borough Council	4
BA/2013/0078/FUL	Stalham	APCON	North Norfolk District Council	4

Application Number	Settlement	Decision	District	Number of dwellings
BA/2014/0195/FUL	Lowestoft	REF	Waveney District Council	4
BA/2015/0277/FUL	Lowestoft	APCON	Waveney District Council	4
BA/2008/0077/FUL	Wroxham	REF	Broadland District Council	6
BA/2013/0217/OUT	Claxton	APCON	South Norfolk District Council	7
BA/2008/0197/FUL	Hoveton	APCON	North Norfolk District Council	8
BA/2011/0279/FUL	Norwich	WDN	Norwich City Council	10
BA/2009/0137/FUL	Stalham	WDN	North Norfolk District Council	14
BA/2009/0251/FUL	Stalham	APCON	North Norfolk District Council	14
BA/2016/0009/OUT	Thurne	<u>WDN</u>	Great Yarmouth	16
Cremorne Lane	Norwich	APCON	Norwich City Council	40
BA/2012/0271/FUL	Lowestoft	APCON	Waveney District Council	76
BA/2012/0005/FUL	Ditchingham	APS106	South Norfolk District Council	105
Generation Park	Norwich	<u>WDN</u>	Norwich City Council	120
				585

Appendix B: Housing Trajectory



Appendix 3: Broads Executive Authority Area 2015 and 2017

Comparison of OAN 2015 and 2017

8. The Central Norfolk OAN produced in 2015 included an uplift for the dwellings required for the City Deal. The updated OAN produced in 2017 excluded the City Deal to ensure that the OAN was 'policy-off'. Housing projections including the 'policy-on' City Deal were also produced in 2017 for information only. The two sets of figures for 2015 and 2017 are reproduced below, with the OAN figure for each assessment highlighted in green.
9. The figures by local authority area from the ORS Model and jobs led growth in the 2017 assessment are shown below:

Figure 103: Projected Dwellings needed for the Broads 2017 by Local Authority (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

	Breckland	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	Waveney
ORS Model Using Long-term migration trends	0	50	70	3	40	66	57
Jobs led growth	0	55	76	4	43	66	57

10. The figures by local authority area from the ORS Model and jobs led growth in the 2015 assessment are shown below:

Figure 104: Projected Dwellings needed for the Broads 2015 by Local Authority (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

	Breckland	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	Waveney
ORS Model Using Long-term migration trends	0	53	95	3	34	63	47
Jobs led growth	0	57	103	3	37	69	51

11. The total OAN in was 286 in 2017 over the 21 year period 2015-36 based on the ORS model. In 2015, the OAN was 320 over the 24 year period 2012-36 based on the jobs-led growth in 2015. This averages as:
 - » 2017 OAN (21 years): 13.6 dwellings per year
 - » 2015 OAN (24 years): 13.3 dwellings per year

The process of assessing housing need in the Broads Executive Authority Area

12. Assessing the housing needs of the Broads Executive Authority Area has several particular difficulties, with the most difficult being working with the small numbers involved. In demography, which is the basis of producing an OAN, it is common to round to the nearest 100. In the case of the Broads, this would make no sense as each of the six local authority segments within the Broads would then be shown as either 0 or 100. Yet even small changes in the number of dwellings to be delivered in the Broads can be a challenge given the nature of the area. Also, the Broads Executive Authority has to work with the six Local Planning Authorities (LPA) to provide the dwellings. Therefore it is important for the OAN process to identify the need by six local authority areas within the Broads. Another fundamental problem is that most data sources, such as population and dwellings forecasts are published at a local authority level and not solely at a Broads Authority Executive Area level.
13. Following the Census 2011, the Broads Executive Authority carried out work to identify the dwelling numbers and population within the part of each output area that lay within the boundary of the Broads. From this, the output areas were combined to give the part of each local authority that lay within the boundary of the Broads. The starting point to produce the OAN was to take these population figures provided by the Broads Authority and to apply the age profile from the Census 2011³⁷ to each local authority area within the Broads. The population was then updated by apportioning 2015 mid-year estimates for local authorities between two areas; 'Central Norfolk within the Broads' (the four local authorities in Central Norfolk) and 'Great Yarmouth and Waveney within the Broads'. The two areas were used so as to give the largest possible areas to make the data as robust as possible and minimising the problem of small numbers.
14. The data was aged year by year, by age band and gender. Natural change from births and deaths, and cross-border migration were applied, with migration based on the 6 local authority rates as smaller area migration data was not available. Headship rates were applied and the number of households was apportioned by the local authorities, again based on the Broads Authority work. The vacancy and second home rate of 25.4% was based on second home and holiday home work by the Broads Executive Authority which involved a detailed assessment of Council Tax records. This rate was used as it is based on Broads local area data and therefore preferential to using district vacancy rates, which would be too low for the Broads, for consistency with the previous SHMA, and because the vacancy and second home rate figures in the previous SHMA were agreed.
15. For the jobs-led forecasts including the City Deal, the proportional uplift for each relevant local authority was applied to the number of dwellings in each local authority area within the Broads. The jobs-led forecast is not the OAN, but was included for information.
16. There are some small differences between 2015 and 2017 figures. The main reasons for these differences were:
 - » Migration rates and other population changes shown in the data between 2014 and 2015 MYE

37

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/2011censuskeys/tatisticsforationalparksinenglandandwales>

» Changes to headship rates

17. The differences in total number of dwellings, comparing like with like are shown below. As might be expected, the ORS Model assessment using long-term migration trends for each of the two years should be compared against each other, and the jobs led growth for each of the two years should be compared against each other.

Figure 105: Comparison of Projected Dwellings for the Broads from the ORS Model and Jobs Led Growth for 2015 and 2017 Assessments (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census)

	Assessment year	Total dwellings	Period (years)	Average dwellings per year
ORS Model Using Long-term migration trends	2015	295	24	12.3
	2017 (OAN)	286	21	13.6
Jobs led growth	2015 (OAN)	320	24	13.3
	2017	301	21	14.3