

## **Broads Local Plan – Issues and Options (2016)**

### **Original Responses**

Personal data such as phone numbers, signatures and personal email addresses have been redacted. Organisational contact information has been retained.

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**Lottie Carlton**

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**From:** [REDACTED]  
**Sent:** 06 April 2016 10:32  
**To:** Lottie Carlton  
**Subject:** Broads New Local Plan Issues and Options Consultation document

Dear Sir/Madam,

Thank you for the opportunity to comment on the Broads Local Plan Issues and Options Consultation Document. Please find enclosed a response on behalf of Anglian Water. I would be grateful if you could confirm that you have received this response.

Essex and Suffolk Water also provide water services to part of the Broads Authority area and their views should also be sought on the Local Plan consultation document. Therefore the following comments relate to Anglian Water's area of responsibility only.

#### 7.3 Existing Policies

Policy DP3 (Water resources and water quality) of the Development Management Policies DPD includes reference to water quality, the inclusion of water efficiency measures, sewage treatment and the provision of Sustainable Drainage Systems (SuDs).

It is considered that the New Local Plan should include a revised version of Policy DP3 or a new policy which includes reference to water efficiency standards, sewage treatment, the foul sewerage network and the surface water hierarchy. Please see more detailed comments relating to these issues as set out below.

#### 8.5 Water Efficiency of New Dwellings

It is noted that the Broads Authority is considering whether to require the optional higher water efficiency standard (110 litres per person per day) for new dwellings. We would support the inclusion of the optional higher water efficiency standard subject to an assessment of financial viability of the whole Local Plan by the Broads Authority.

#### 8.6 Water Efficiency of Non Residential Development

Anglian Water would welcome water efficiency measures being included as a requirement for non-residential development subject to an assessment of financial viability of the whole Local Plan by the Broads Authority.

#### 8.7 Water supply and wastewater infrastructure

It is noted that the Broads Authority has outlined a number of options relating to how sewage treatment will be addressed in the Broads Authority area.

Policy DP3 – Water Quality and Resources refers to a connection to a foul sewer being the preferred option for new development unless it is proven that this is not appropriate.

Where there are no public foul sewers within the area it is open to residents to make a 'Section 101A' application to Anglian Water which is for the provision of a new public sewer. This is typically done at the village scale. There is an application

process for this which can take up to four months. Further information is available here:

[http://www.anglianwater.co.uk/assets/media/your\\_guide\\_to\\_first\\_time\\_sewerage\\_v4\(1\).pdf](http://www.anglianwater.co.uk/assets/media/your_guide_to_first_time_sewerage_v4(1).pdf).

Where it is proposed that a connection will be made to a public sewer the New Local Plan should include a requirement to demonstrate there is adequate sewage treatment to serve the development or that this can be made available in time for the development. It would also be helpful if the New Local Plan included a policy which required applicants to demonstrate that there is available capacity within the foul sewerage network or that capacity could be made available.

#### 8.10 Sustainable Drainage Systems (SuDS)

Anglian Water would wish to see a policy included in the Local Plan which requires the provision of SuDs as part of new developments. As part of which it would be helpful if developers were required to provide evidence that they have followed the hierarchy as outlined in page 36 of the consultation document before proposing that surface water should be discharged into a surface water sewer.

Reference is made to whether specific SuDs methods should be required as part of the New Local Plan. Developers can apply to Anglian Water to adopt SuDS proposed as part of their development. Anglian Water's current standards for SuDs adoption are available to view at the following address:

<http://www.anglianwater.co.uk/developers/suds.aspx>

#### 20.2 Housing and 20.5 Settlement Hierarchy

It is noted that the Broads Authority will identify a housing target for the plan area and prepare a settlement hierarchy which will outline the scale of housing development at specific locations.

Anglian Water would wish to comment on the implications for our existing infrastructure when the scale and distribution of additional housing development is known. As part of which consideration we will need to be given to any further evidence prepared by the Broads Authority relating to a water and water recycling infrastructure to inform the New Local Plan.

Similarly we would wish to comment further on any additional employment and retail allocation sites which are identified by the Broads Authority.

#### Developer contributions and Planning Obligations

Views are sought on 'rolling forward' Policy DP30 (Developer Contributions) of the Development Management Policies DPD.

Foul network improvements (on-site and off-site) are generally funded/part funded through developer contribution via the relevant sections of the Water Industry Act 1991. The cost and extent of the required network improvement are investigated and determined when we are approached by a developer and an appraisal is carried out.

Similarly water infrastructure provision will be dependant on location and scale of the development and contributions for upgrades or strategic schemes will be obtained through provisions in the Water Industry Act 1991.

As set above we seek contributions directly from developers in accordance with the provisions of the Water Industry Act 1991. Therefore Anglian Water would not expect there to be provision within planning obligations or the Council's CIL Charging Schedule for water or water recycling water infrastructure.

Should you have any queries relating to this response please let me know.

Regards,

**Stewart Patience**

Planning Liaison Manager

**Anglian Water Services Limited**

[Redacted Address Line]

Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT

[www.anglianwater.co.uk](http://www.anglianwater.co.uk)





**Lottie Carlton**

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**From:** [REDACTED]  
**Sent:** 14 April 2016 17:00  
**To:** Planning Policy Mail  
**Subject:** FW: Broads Authority Plan

**Categories:** Ack

[For your information..](#)

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**From:** Bull Sue  
**Sent:** 14 April 2016 16:51  
**To:** 'broadsplan@broads-authority.gov.uk'  
**Cc:** Patience Stewart  
**Subject:** FW: Broads Authority Plan

Dear Sir/Madam,

In addition to my colleagues representations on The Broads Authority Plan submitted below I would like to add comments in respect of section 8.8 (page 33) of the plan: Horning Knackers Wood Water Recycling Centre.

Due to its location and proximity to the Broads, the sewerage system in Horning has always had an issue with the ingress of water, either from groundwater infiltration, where water seeps into underground pipework, or from surface water when the Broads over tops into the streets of Horning and subsequently floods via manholes into the sewerage system.

In an attempt to alleviate flows getting into the sewerage system, in 2014/15 Anglian Water carried out camera surveys of all of its owned sewers and any that had shown to have groundwater ingress have been replaced or relined. Out of the entire network of 9.5km, a total of 1.5km has been repaired. However, as recent incidents has shown this has not solved the previously known flow issues.

Therefore we are proposing a second phase of work to address the problem.

- Surveying of non-Anglian Water assets, namely privately owned laterals to assess groundwater infiltration
- Investigation into three privately owned pumping stations with regards to flows, pump rates and running times
- Working with the Highways Authority, potential removal of two surface water drainage gullies from our sewerage system
- Building of a hydraulic model to understand the flow and capacity within the system

These investigations will inform us of the next phase of work in an attempt to address the current issues within the catchment

Regards

**Sue Bull**  
**Planning Liaison Manager**

**Anglian Water Services Limited**  
[REDACTED]

**From:** Patience Stewart  
**Sent:** 14 April 2016 11:24  
**To:** 'broadsplan@broads-authority.gov.uk'  
**Cc:** Simpson Allan; Bull Sue  
**Subject:** RE: Broads Authority Plan

Dear Sir/Madam,

Thank you for the opportunity to comment on the Broads Authority Plan. Please find enclosed comments on behalf of Anglian Water. I would be grateful if you could confirm that you have received this response.

It is noted that there a number of actions where Anglian Water is identified as a partner organisation to achieve the aspirations of the Broads Authority as outlined in the Draft Plan. Please find enclosed specific comments relating to those actions which are relevant to Anglian Water.

*1.2.2 Promote and implement measures to manage water resources and respond to periods of water shortage and scarcity, including water abstraction controls, water transfer and trading, and water infrastructure improvements*

Reference is made to Anglian Water's existing plans (Water Resource Management Plan and Business Plan) as being part of the activity required to achieve the above action therefore we have no comments relating to this action.

*1.2.3 Promote and assist implementation of good practice water efficiency and water capture measures at community level through targeted campaigns and incentives to homes and businesses*

Anglian Water's on-going Water Saving and Metering Programme will be coming to parts of the Broads Authority area in the latter parts of this financial year. The scheme will see us install water meters and water efficiency devices in customers' homes in a bid to help families and individuals reduce the amount of water they use, and the amount they pay in their bills.

Water meters will be fitted to homes which do not have one. Customers will then have a choice as to whether they which to switch to measured charges. Anglian Water will be able to show customers a comparison between their current bill and a measured bill once the meter has been fitted. Evidence shows that households generally use less water when there is a meter installed.

To help customers save water and energy Anglian Water is also offering home visits by its' Water Saving experts, who can offer water saving advise and where possible, fit water saving products

The scheme is supported by DEFRA, the Environment Agency and OFWAT, and will allow us to build a much clearer picture of water consumption across our region. Customers will be provided with facts and figures so they can see exactly how much water they are using, and that they are being charged in the fairest way possible.

This programme is part of our integrated approach to managing water supply and sits along other key initiatives like our £60m war on leaks. Together we hope to improve our operations while helping customers save money and live in a more environmentally friendly way.

*2.1.2 Promote and implement measures to reduce levels of nutrient and pesticide pollution to watercourses including:*

- *Offer tailored pollution management advice and support to land managers*
- *Demonstrate and implement environmental land management measures*
- *Develop and install public and private waste water practical infrastructure and land management works, and run public awareness campaigns*

*2.2.1 Promote and implement measures to reduce fen pollutant inputs and where possible, manage fen water levels and salinity, including:*

- *Implement water level management controls at protected sites*
- *Provide tailored advice and support to fen land Managers*

It is important to note that Anglian Water does not abstract surface water from the Broads Authority area. For this reason we are not intending to take a lead on the above actions. However we would support initiatives where these are relevant to Anglian Water. We would welcome further discussion relating to the above actions prior to the plan being finalised.

*2.3.1 Promote and implement measures to maintain wet grassland water levels and peat condition, and to reduce salinity and pollutant inputs, including:*

- *Implement water level management measures at protected sites*
- *Provide tailored advice and support to grazing marsh managers*

Similarly it would be helpful to clarify Anglian Water's role in relation to the above action.

Should you have any queries relating to this response please let me know.

Regards,

**Stewart Patience**

Planning Liaison Manager

**Anglian Water Services Limited**

Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT  
[www.anglianwater.co.uk](http://www.anglianwater.co.uk)



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**From:** Patience Stewart  
**Sent:** 08 April 2016 17:21  
**To:** 'broadsplan@broads-authority.gov.uk'  
**Cc:** Simpson Allan  
**Subject:** Broads Authority Plan

Dear Sir/Madam,

Thank you for the opportunity to comment on the Broads Authority Plan. The Growth and Planning Team is largely focused on land use planning and therefore we have shared the Plan with other teams within the business for comment.

I'm afraid that I am currently awaiting comments from a number of colleagues from within the business therefore I am unable to provide a response today.

I hope to be able to provide a response on behalf of Anglian Water early next week – could you please let me know if this will be a problem from your perspective.

Regards,

**Stewart Patience**

Planning Liaison Manager

**Anglian Water Services Limited**

Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT

[www.anglianwater.co.uk](http://www.anglianwater.co.uk)



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Your ref:  
Date: 10/03/2016

Miss Natalie Beal, Planner  
Spatial Planning  
Broads Authority  
Yare House 62-64 Thorpe Road,  
Norwich  
NR1 1RY

Dear Miss Beal

### **Re Consultation on the Broads Local Plan – Issues and Options**

I refer to the above consultation.

The Council offers these comments in response to the following issues:

#### **GREEN INFRASTRUCTURE**

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

It is suggested that these two options are taking forward:

- ✓ Option 2: A Strategic Green Infrastructure Policy
- ✓ Option 3: Specific Policies covering some GI projects

As in similar approach to the Council's DMDPD the provision of green infrastructure could be of particular importance to address potential impacts of increased visitor pressure on Natural 2000 sites whilst increasing ecological connectivity in the area.

#### **HOUSING**

Issue 22 – how can the Local Plan address the Full Objectively Assessed Housing Need of the Broads?

- ✓ Option 2: Meet full objectively assessed housing need in the broads in accordance with National guidance. In addition, HRA assessment will need to be undertaken to ensure no significant effects arise as a result of increased visitor pressure and any identified mitigation measures are implemented.

Affordable Housing – Para 20.3

Broadland District Council  
Thorpe Lodge, 1 Yarmouth Road  
Norwich NR7 0DU



It is understood that is intended to role forward the policy approach of using the percentages of your districts

Q. Do you have any comments on this approach?

This is an acceptable approach

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

#### Gypsy, Travellers and Travelling Show People Need in the Broads - Para 20.4

This section states that the Broad's Authority is not aware of existing sites within the Broads Executive Area, nor it is aware of any unauthorized sites. However, there is no mention of Boat people or Travellers by boat. There may be a potential need for this specific group and in which case any needs identified should be accommodated within the Broads.

#### Settlement Hierarchy and Development Boundaries - Paragraph 20.5

This section describes the purpose of a development boundary to 'consolidate development around exiting built up communities where there is clearly defined settlement and where further development, if properly designed and constructed, would not be incongruous or intrusive because of the size of the settlement'

Furthermore, four areas in the Broads Executive Area with development boundaries are listed. It is also understood that a Settlement Hierarchy for the Broads is currently underway and as part of this the Methodology seeks to assess what facilities a settlement has within or nearby. We note that there is no mention of 'Norwich' which forms part of the built- up area and the facilities within are accessible to nearby settlements with the potential for growth.

#### Residential Moorings - Para 20.6

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

Appendix F 'Residential Moorings – call for suitable areas' appears to cover the necessary criteria to help in assessing appropriate location - subject to outcome of HRA assessment on visitor pressure.

#### Floating Buildings - Para 20.7

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

The options of houseboats, residential moorings and floating buildings as defined in the DM DPD are welcomed. However, the impact will need to be assessed through SA and HRA assessment. The issue raised about Design could be addressed through 'design codes' as per NPPF para 59. Furthermore, it is acknowledged that the adverse impact on navigation should be avoided, as well as the other points raised such as potential landscape impact.



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

It is felt that the NPPF provides sufficient policy to address this issue

- ✔ Option 3: make a short guidance note for determining planning applications may be of assistance also.

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

It is suggested that legal advice is sought on this subject, as it is understood that second home owners cannot be treated differently in planning terms.

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

- ✔ Option 2: Set a requirement for self-build plots as part of site allocation policies

Any policy should ensure that development is only allowed in suitable and sustainable locations.

**RETAIL**

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

As the NPPF supports a prosperous rural economy it is recommended that a combination of the following options be considered further:

- ✔ Option 2: set primary and secondary frontages
- ✔ Option 3: Retail hierarchy
- ✔ Option 5: Safeguard existing retail units

It is understood that this could involve a retail study. This approach is in line with the NPPF which suggests using a proportionate evidence base.

**ECONOMY**

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

It is felt that the approach could involve a combination of the following options:

- ✔ Option 2: Less restrictive policy and allow other uses and,
- ✔ Option 3: Seek to retain sites in employment use. Taking full account of flood risk per NPPF guidance.

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

- ✔ Option 3: allocate employment areas

Another option could be to prepare a 'criteria based policy'. Location will depend on what type of employment and other constraints such as proximity and impact on nature conservations, flood risk etc. It is unclear whether there is an employment need, apart from the obvious demand for tourism related.

## **TOURISM**

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

As the NPPF supports a prosperous rural economy, it is felt that the approach could involve a combination of the following options:

- ✔ Option 2: Seek to retain tourist facilities through general policy
- ✔ Option 3: Site Specific policies for larger tourist attractions

The potential effects will need to be assessed through SA and HRA.

## **SITE SPECIFIC**

### Thorpe Island - para 32.3

### **Issue 44 – how to address Thorpe Island Local Plan?**

It is understood that the Planning Inspector allowed the mooring of up to 25 boats subject to a number of specific conditions. Also that the conditions were not complied with and that in January the permission lapsed. Furthermore, that this decision has been challenged and the outcome is expected imminently.

The consultation document only offers two options:

Option 1: to roll Policy from 1997 Local Plan or,

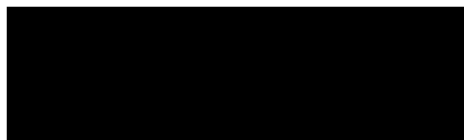
Option 2: A Refreshed criteria based policy –reflecting on recent decisions.

There may be potential for a third and fourth option which could potentially involve:

- a) allocating the site as a Specific Policy as set in the planning permission or,
- b) based on the owners' proposal an alternative that should be considered.

I hope the above are useful comments in response to your consultation documents. If you wish to discuss any of the points raised above please do not hesitate to contact me directly.

Yours sincerely



Isabel Appleyard, MRTPI  
Senior Planning Officer



**Lottie Carlton**

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**From:** Debra Yeomans [REDACTED]  
**Sent:** 08 April 2016 13:45  
**To:** Broads Plan  
**Subject:** Chedgrave Parish Council

I am writing on behalf of the Councillors of Chedgrave Parish Council following a Parish Council meeting held yesterday, 7 April 2016.

- Chapter 6 of the Broads Local Plan considers challenges and opportunities, the Cllrs believe that a key threat is the impact of other public bodies making spending decisions that impact on Broads Authority key aims and result in not maintaining rights of way, reducing visitor facilities and the promotion of tourism.
- Chapter 9 - Open space, play and allotments, the Cllrs support Option 4. They would also propose that Loddon & Chedgrave be included when considering the lack of public launching facilities as there has been a long standing demand for these facilities in the area.
- In addition the Cllrs wished it to be noted that their main areas of concern are the R Chet and maintaining navigation and footpaths which in turn encourages visitors to the area which then supports the livelihoods of local people.

*Debra Yeomans*  
*Clerk*  
*Chedgrave Parish Council*

Respondent: Codling, R

**Lottie Carlton**

---

**From:** Richard Codling [REDACTED]  
**Sent:** 08 March 2016 12:59  
**To:** Broads Plan  
**Subject:** broads plan and broads local plan

Dear Sir or Madam,

With regards to the consultation on both plans above I would like to see more commitment on preserving the navigational rights into the centre of Norwich. I note that in the Navigational committee minutes of 11/12/14 there were proposals by Network Rail to replace the rail swing bridge with a fixed bridge, this would in turn lose Norwich its historic port authority status.

So I would ask if this status could be preserved and included in both the broads plan and the broads local plan.

Yours sincerely, R. Codling (boat user).

Natalie Beal  
Broads Authority  
Yare House  
62-64 Thorpe Road  
Norwich  
NR1 1RY

**Our ref:** AE/2006/000197/CS-  
02/IS1-L01  
**Your ref:** None  
**Date:** 08 April 2016

Dear Ms Beal

## **BROADS LOCAL PLAN TO 2036 – ISSUES AND OPTIONS**

Thank you for consulting us on this stage of the new Local Plan, which we have found to be generally comprehensive in its coverage of issues, and establishes a good basis for preparing the final Plan. We have reviewed the document and have provided comments below, grouped in accordance with the sections of the Issues and Options consultation document. We would welcome the opportunity for on-going engagement as the Plan progresses.

### **Section 6: Challenges and Opportunities**

We broadly agree with and support the challenges and opportunities identified within this section. We particularly welcome the opportunities highlighted in respect of adapting to flood risk, improving water quality, enhancing biodiversity and encouraging sustainable design and low carbon lifestyles. We will look to support the preparation of a Plan that enables these opportunities and challenges to be met and addressed.

### **Section 8: Water**

#### **8.1 Introduction**

We support the recognition in this section of the potential for development and activities to impact on the water environment in a range of ways. While many of the activities mentioned such as abstractions and discharges into waters may need permits from the Environment Agency, other activities or those of a smaller scale will not. It is important that the Plan includes an appropriately robust framework to ensure that these issues are appropriately addressed through planning.

The Water Framework Directive (WFD) is mentioned here, but there are also other relevant directives that will need to be taken into account, such as the Habitats directive protecting sensitive areas such as SACs and SPAs.

**Essex, Norfolk & Suffolk - Icen House**

Cobham Road, Ipswich, Suffolk, IP3 9JD

General Enquiries

*Weekday Daytime calls cost 8p plus up to 6p per minute from BT Weekend Unlimited.*

*Mobile and other providers' charges may vary*

Email

Website: [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

## 8.2 Water Framework Directive

We welcome the reference in this section to having regard to the River Basin Management Plans (RBMP). All Local Plan approaches and policies should be considered with the objective of improving the status of waterbodies in mind. This will include considering impacts on water quality, as highlighted, but also the potential for direct physical impacts on waterbody morphology. Delivering in respect of WFD has clear benefits for water quality and biodiversity.

## 8.3 Water Quality

The statements included here are welcomed, as is the inclusion of reference to the plans and aspirations to improve and protect water quality through specific programmes and partnerships. As the Plan preparation progresses, all opportunities to protect and improve water quality should be considered.

Diffuse water pollution plans have been written and are currently being reviewed. These address those Broads that are not in 'favourable condition', as defined by Natural England, where this is thought to be due to diffuse pollution. The plans attribute actions to help improve water quality and habitats. The Local Plan should also acknowledge these and seek to contribute to the actions within them where appropriate.

We would also highlight that addressing rural runoff from verge erosion can help in reducing diffuse pollution. Soil pulled off fields onto roads by inappropriate passing places contributes sediment and often phosphate (a nutrient) to the local watercourses. These can have a negative impact on the water quality. Working with the highways departments of local councils and developers to identify and resolve these issues as part of development proposals would help improve water quality. For example, there may be an opportunity to require the construction of metalled passing places if traffic will increase as a result of development.

## 8.4 Run off from boat wash down facilities

We would support the inclusion of more detail within the Plan on this issue with the intention of improving understanding and therefore compliance.

## 8.5 & 8.6 Water Efficiency of New Dwellings/Non Residential Development

As a contribution to securing sustainable development, we would be supportive of the Local Plan seeking the higher water efficiency standard for new residential development. We would also suggest that the promotion of water efficiency for non-residential development should also be considered.

## 8.7 Water Supply and Waste Water Infrastructure

We would support an approach that highlighted the hierarchy of preferred treatment methods and also gave advice on the suitability and maintenance of non-mains systems. We do have some concerns over the inclusion of reed bed filtration systems. Whilst they can provide a very useful polishing for treatment plant effluent, we are less certain that they can always clean effluent adequately on their own. Given the sensitivity of the Broads, the role of such systems should be carefully considered.

## 8.8 Horning and Knackers Wood Water Recycling Centre

We welcome the highlighting of this issue and note the intention to monitor the situation as the Plan progresses. We would support the inclusion of appropriate text in the final Plan if the situation remains an issue for future development to consider.

## 8.9 Flood Risk

We support and welcome the detail provided in the Plan at this stage in respect of flood risk, which is clearly a key issue for development across the area to address. Flood risk in the Broads does have specific characteristics, and it is appropriate and important that the Plan considers this, and provides sufficiently detailed policies and guidance to ensure that development is safe and flood risk elsewhere is not increased. However, it remains equally important that the approach taken is consistent with that contained within national planning policy and guidance.

For all new development proposals there must be a robust application of the National Planning Policy Frameworks (NPPF) Sequential Test to avoid development in areas of flood risk wherever possible and to maintain the function of these areas for natural processes.

Within the Broads, consideration should be given to the low lying nature of the land and the potential magnitude of climate change impacts over a period of up to 100 years when considering proposed development. With the effects of climate change there is also the potential for tide-locking to occur.

As you are no doubt aware, we support the intention to update the Strategic Flood Risk Assessment, as highlighted in this section. We would encourage further dialogue with all relevant authorities including Anglian Water, NCC as Lead Local Flood Authority, the IDB and neighbouring LPAs.

We are aware that Waveney District Council is also intending an SFRA update in the coming months. A consistency of approach will be important. It will be particularly significant at Mutford Lock in Lowestoft, the boundary between Oulton Broad (BA) and Lake Lothing (WDC), especially if there is the potential for larger events to overtop the lock.

Updating the SFRA will mean that the latest hydraulic modelling and climate change allowances can be incorporated to inform the evidence base. Previous climate change allowances were based on projections from 2002. Since then, our understanding of the science has improved and there have been new global assessments of climate change, as well as new UK climate projections from 2009. At the UK level, the main changes are a much more detailed understanding of changes in average rainfall, as well as improvements in the scientific understanding of how different catchments respond. As a result, the changes to the guidance on fluvial flooding have been made. Sea level and storm allowances have not been changed from the previous version.

The most up to date information on climate change for planning can be found at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

We have identified a number of communities within the Broads area which we have recognized as potential 'Communities at Risk'. These communities are shown to be at risk of flooding based on our modelling and flood history investigations. These areas were all previously discussed in the Broadland Rivers Catchment Flood Management Plan 2009.

In March 2016 we published the Anglian river basin district Flood Risk Management Plan (FRMP). The flood risk management plans explain the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs. FRMPs set out how [risk management authorities](#) will work with communities to manage flood risk over the next 6 years. The Anglian FRMP can be found by using the following link <https://www.gov.uk/government/publications/anglian-river-basin-district-flood-risk-management-plan>

Whatever work is required regarding flood defences to keep communities safe in the future, affordability will be a key issue. Developer contributions should be sought where appropriate, along with partnership funding where applicable. The following links and attached document provide more information and guidance on partnership funding:

<https://www.gov.uk/government/collections/flood-and-coastal-defence-funding-for-risk-management-authorities>

<https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding-an-introductory-guide>

<https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding>

#### 8.10 Sustainable Drainage Systems (SuDS)

SuDS have the potential to not only reduce flood risk, but to also contribute to improved water quality (as highlighted for rural SuDS in this section), and provide habitat enhancement.

There are a wide range of SuDS methods available; the Plan should seek to ensure that SuDS appropriate to the Broads area and that contribute widely to key objectives are delivered. This means, for example, SuDS that secure the required level of treatment to protect water quality, and offer the greatest potential for ecological improvement, by creating and/or linking habitats. The linking of habitats is also highlighted as an important issue under Green Infrastructure, Climate Change & Biodiversity sections of the Plan.

### **Section 10: Green Infrastructure**

We would suggest that 'blue infrastructure' be considered as part of this section, given the close linkages between the two in the Broads area. Measures that provide flood risk management, including SuDS, have the potential to provide further benefits in addition to the primary role. This multifunctional approach should be a key aspect of all green and blue infrastructure, and should be incorporated as part of new development proposals at the design stage. There are also links to WFD, and the

need to ensure that any physical impacts on waterbodies, and resultant mitigation, are considered as part of any planning application.

## **Section 16: Landscape Character**

### **16.5 Land Raising**

As highlighted in this section, land raising has the potential to increase flood risk, which would be contrary to national planning policy. Therefore, any such proposals would need to assess and manage this impact appropriately. Flood Defence Consent, if within 8m of a Main River or Land Drainage Consent, if affecting an ordinary watercourse, may be required. Additionally, the disposal of material must be in accordance with the requirements of the Environmental Permitting Regulations 2010.

## **Section 21: The Broads Economy**

### **27.2 Economic Issues & 27.3 Location of Economic Development**

Flood risk is a key issue for many development proposals in the Broads area. Where sites are considered in flood risk areas, the selection of sites must be based on the application of the Sequential Test. Suitability will be subject to the Exception Test (where applicable), and an appropriate Flood Risk Assessment.

## **Section 24: Housing**

### **20.2 Housing**

When considering how to address housing need for the Broads area, it will be essential to make decisions based on a robust evidence base. This will include, if necessary, ensuring that compliance with the flood risk Sequential Test can be demonstrated. Defining appropriate criteria on which to assess the Sequential Test, including the area of search, will be key to this.

### **20.6 Residential moorings & 20.7 Floating buildings**

We recognise that planning law in respect of residential moorings is very complicated. Where Local Plans contain policies relating to floating structures, they must be informed by the flood risk Sequential Test and Exception Test. For such development to be acceptable, it must also not increase flood risk elsewhere; reduce flood risk overall wherever possible; and be safe for its lifetime taking into account climate change.

The appropriateness of such development must be considered based upon its Flood Risk Vulnerability Classification from Table 2 of the Flood Risk and Coastal Change Planning Practice Guidance. The vulnerability classification of floating structures is not formally defined, this is for the LPA to decide based upon national planning policy and guidance, and we can assist in discussions on this. The main channel of rivers is usually considered as Flood Zone 3b, the functional floodplain. Only residential accommodation associated with water-compatible uses (as defined by Table 2), is appropriate in FZ3b.

We also offer the following more detailed points that would need to be considered before such floating structures could be permitted:

Access and Egress - Floating houses would need to offer safe access and egress routes to non-flooded areas should, for example, power or water supplies be lost which make the house no longer safe or habitable.

Floating structures in the channel of a Main River or within byelaw distance will require Flood Defence Consent. There may also be fisheries, navigation, water quality and aquatic biodiversity issues to consider.

The potential 'downstream' effects on flood risk of floating buildings and residential moorings would also need to be taken into account in an FRA. Compensatory storage may need to be provided to at least equal displacement of the loaded structure. We should also be satisfied that the building or structure does not obstruct flows, and does not present a risk of breaking free and obstructing flow channels.

During a flood, debris such as large branches or even cars that are carried in the floodwater can hit the structure below or above the waterline. At high velocities that could damage the structure, including the undercroft area or tanks that provide the floatation.

After a flood the structure may be designed to settle back down upon its foundations. However if debris has come to rest underneath this will be trapped, potentially meaning the house does not settle evenly. This can cause structural stress and also make it very challenging to remove the debris. This would be a particular risk for buildings using stilts or piling as a mechanism to retain a structure in place. The design would also need to ensure its anchorage mechanism can withstand the floodwater velocities. It is not within our remit to endorse the mechanics of the structure. The LPA would need to consider this.

The responsibility and cost of long term maintenance is likely to rest with the householder, who will need to ensure the building will function properly throughout its design lifetime. There is a risk that routine maintenance is not undertaken or key parts of the structure, e.g. the underneath, cannot be accessed and inspected. A fault or failure in any part of the design which compromises the structure's ability to operate properly may only become apparent during a flood. The LPA should satisfy itself that the structure can be maintained over its lifetime and apply appropriate conditions.

Such development would also need to consider WFD impacts through an assessment of direct effects on river morphology. Generally the objective should be to soften embankments where possible. If larger scale projects are planned, then it may be sensible to consider mitigation improvements in other areas of the system, i.e. have a habitat improvement plan / bank to offset development.

## **Section 25: Design**

We would support the adoption of an approach that secures design which delivers multiple benefits through a joined up approach. As highlighted above, and recognised in part in this section, an informed design approach can ensure that individual features such as SuDS deliver wider benefits that can contribute to for example reducing flood risk, securing water quality and enhancing biodiversity.



However, such features will usually require integration within the initial scheme design.

### **Section 29: Waste**

We would support the adoption of an approach that seeks to promote the management of waste from development sites in accordance with the waste hierarchy.

### **Section 31: Developer Contributions/Planning Obligations**

We would recommend that discussions should be held with partner organisations who are seeking to deliver actions across the area. This might include for example us and the Broadland Catchment Partnership. Through a coordinated approach, there may be opportunities for the measures required to make the development acceptable to also make a contribution to those actions.

### **Section 32: Site-Specific Policies**

#### **32.4 Ferry Corner, Horning**

We would highlight that this site is partially impacted by Flood Zone 3; as such a flood risk assessment would be required for any application for a change of use. This would need to demonstrate that the proposal would be safe for its lifetime, having regard to climate change and the revised (increased) climate change allowances for fluvial flood risk.

#### **32.5 Other sites**

All sites listed are subject to flood risk. For any proposed changes of use, as detailed above, an FRA would be required to demonstrate that the development would be safe for its lifetime taking into account the updated climate change allowances. Where new build development is proposed, it will also be subject to the requirements of the Sequential Test and Exception Test as appropriate.

We trust this advice is useful. Please contact me if you wish to discuss any aspect of this response in more detail.

Yours sincerely



**MR MARTIN BARRELL**  
**Sustainable Places - Planning Specialist**

Direct dial

Direct e-mail

# **Broads Local Plan**

## **Issues and Options Consultation**

### **Representations in Respect of Somerleyton Marina and Boatyard**

**March 2016**

**SOMERLEYTON MARINA LTD**



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**Issues and Options Consultation Document**

**Representations in Respect of Somerleyton Marina and Boatyard**

**Reference: E374.C1.BLPR.Rep01**

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**Appendix 1** Drawing Showing Marina Linkages

**Appendix 2** Drawing Showing On Site and Village Facilities

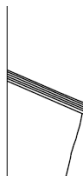
**Appendix 3** Drawing Showing Site, Facilities and Potential Development Area

**Appendix 4** Somerleyton Village Profile

**Appendix 5** Drawings from Planning History Records

## 1.0 Executive summary

- 1.1 Somerleyton marina and boatyard is an economic asset to the area. From its history of pioneering research leading to the invention of the Hovercraft, through early innovation in Broads Cruiser design to the modern day where it provides a range of services and facilities to the increasing number of private boat owners on the Broads, as well as a sustainable point of access between the waterways, the railways and the tourist offer of Somerleyton and the wider area.
- 1.2 The boatyard and marina is owned by Somerleyton Marina Ltd which is associated with the Somerleyton Estate. The Somerleyton Estate purchased the marina in 2011, securing its future given its previous uncertain prospects as part of a worldwide group of companies.
- 1.3 There is potential to expand the private moorings at the marina in response to demand and to exploit the associated need for increased boatyard services including boat repair and servicing.



- 1.4 This in turn would keep the additional waterside services and facilities such as the slipway and boatlift viable and operational for the benefit of all. In the interim the existing marina is in need of maintenance and repair for which the newly adopted Moorings Guide provides guidance and which is

currently planned by

- 1.5 Our clients, Somerleyton Marina Ltd, require a clear and positive planning policy framework in order to judge investment risk before this potential can be realised. The Broads Local Plan Review provides an excellent and timely opportunity to engage in the plan making process and to provide the framework necessary for future economic development.
- 1.6 The Issues and Options consultation document suggests three policy options for addressing the location of new employment land. At this stage our preferred option is Option 1. This is because the existing Development Management policies most relevant to the marina and boatyard (DP16 Moorings, DP19 Business Diversification and DP20 Development on Waterside Sites in Commercial Use Including Boatyards) already provide a useful basis on which to base development decision making. Their re-use in the new local plan is supported provided that the strategic policies which guide their application are more positively worded, in line with national planning policy imperatives.
- 1.7 These representations introduce the site and describe it and its context. We outline the key national policy drivers to which the Broads Authority will need to have due regard when developing new planning policies and we conclude by setting out our views on the policy options being consulted on.
- 1.8 We look forward to engaging with the Broads Authority on their new local plan and to developing a policy framework that can support the future sustainable economic development of this unique and valuable economic asset.

## **2.0 Introduction and Site Context**

- 2.1 Evolution Town Planning has been instructed by Somerleyton Marina Ltd (part of the Somerleyton Estate) to make representations to the Broads Authority Local Plan Issues and Options consultation with the purpose of pursuing a positive and flexible planning policy environment to enable future development potential.
- 2.2 The site has a long and rich history, particularly its connection to Somerleyton and Somerleyton Hall nearby shown on the drawing in Appendix 1.
- 2.3 The prevalence of existing facilities in the marina and boatyard as well as in the village of Somerleyton makes this a very sustainable site from both the economic development and tourism perspectives.
- 2.4 The marina provides a gateway to Somerleyton which is a major tourism destination.
- 2.5 The close proximity of the Somerleyton rail station means the marina and boatyard are sustainably located in terms of visitor access by means other than the private car. Visitors to Somerleyton village, Somerleyton Hall and Gardens and The Broads can arrive by train and then access the waterways or vice versa.
- 2.6 Pedestrian access from the marina and boatyard to the village places village facilities in walkable distance including the Dukes Head pub (part of the Broads 'Pub Network') and the village shop shown in the drawing in Appendix 2.

### **Brief Site History**

- 2.7 The boatyard has a history going back to Victorian era when wherries moored adjacent to the brickworks which closed just after the Second World War. It is understood that bricks from here were used in the construction of Liverpool Street Station.
- 2.8 In the succeeding period the boatyard was owned by Christopher Cockerel

the owner of Ripplecraft who produced a fleet of very distinctive river craft<sup>1</sup> and was also the inventor of the hovercraft:

*The hovercraft was invented by Sir Christopher Cockerel whilst he owned and worked at Ripplecraft, the boatyard in Somerleyton. From 1953 to 1956 as well as designing and building hire craft for the Broads Sir Christopher “worked on the problem of making boats go faster”. He was attempting to make boat propulsion more energy efficient and one of his experiments was to inject air under the hull of his launch Spray. From this work he developed a working hovercraft model. Unable to take the development further without aid Sir Christopher demonstrated the model to Lord Somerleyton on the lawn at Somerleyton Hall. Lord Somerleyton was impressed and arranged for Sir Christopher to demonstrate the model to Lord Mountbatten who was First Lord of the Admiralty at the time. Eventually the National Research & Development Corporation backed the project, Sir Christopher and his family moved to the South Coast and the prototype SR-N1 was built and crossed the English Channel on 25th July 1959 to widespread acclaim.<sup>2</sup>*

- 2.9 The current marina was formed around the 1970s and up until then historic map regression indicates an east/west cut leading up to the brickworks.
- 2.10 The Somerleyton Estate purchased the marina basin in 2011 from the Tui group of companies<sup>3</sup> thereby securing its future.

### **Location and Context**

- 2.11 Somerleyton Marina is located west of the village of Somerleyton. The marina is inside the Broads Authority administrative area and the village is inside the Waveney District area. This administrative boundary is shown on the drawing in Appendix 3.
- 2.12 Somerleyton is located in the north of Waveney District and is 6 miles from the town of Lowestoft and 8.5 miles from Great Yarmouth. Somerleyton is connected directly to Lowestoft by rail with an approximate 20 minute travel time. The boatyard and marina is 550m from the Somerleyton rail

<sup>1</sup> [http://norfolk.broads.org.uk/wiki/index.php5?title=Ripplecraft\\_of\\_Somerleyton](http://norfolk.broads.org.uk/wiki/index.php5?title=Ripplecraft_of_Somerleyton)

<sup>2</sup> <http://somerleyton.onesuffolk.net/our-area-and-its-history/the-hovercraft-and-somerleyton/>

<sup>3</sup> <http://www.tuigroup.com/en-en>



station via public footpath. Somerleyton is equidistant to Blundeston (a 'larger village' in the Waveney settlement hierarchy) and St Olaves in Great Yarmouth Borough.

- 2.13 Somerleyton is a popular tourist attraction with 16,500 visitors in 2008<sup>4</sup> and 25,000 in 2015<sup>5</sup>.
- 2.14 Tourists visit Somerleyton for the Hall and Gardens but also the model village and the village itself; many arriving by boat or train and walking up to the Hall.
- 2.15 The Waveney District Council Village Profile (Appendix 4) for Somerleyton lists the key facilities which contribute to the sustainability of a settlement. The key facilities include a food shop, public house, primary school, post office and meeting place.
- 2.16 The additional key facility which Somerleyton benefits from, which many of the 'larger villages' in Waveney and The Broads do not, is the rail station which is on the Norwich to Lowestoft line.

#### **The Site Today**

- 2.17 Today the boatyard and marina is owned by Somerleyton Marina Ltd which itself is owned by the Somerleyton Estate<sup>6</sup>.
- 2.18 The marina and boatyard facilities include:
  - 117 private moorings
  - a slipway
  - lift in and lift out
  - hard standing storage
  - undercover storage
  - boat repairs
  - restoration and maintenance services

<sup>4</sup> <http://www.enjoyengland.com/>

<sup>5</sup> Somerleyton Estate

<sup>6</sup> <http://visit.somerleyton.co.uk/estate/marina/>

- free Public 24 hour Broads Authority Moorings are available close by
- 2.19 The marina and boatyard is accessed by vehicle via an Estate-owned road linking to The Street providing pedestrian access via footway into the village.
- 2.20 The pub and rail station are accessible by road and easily walkable from the marina via a short distance footpath.
- 2.21 The private moorings at the marina are full and the boatyard is busy with Northgate Marine Ltd (<http://www.northgate-marine.co.uk/>) having moved from its site in Lowestoft to Somerleyton around 3 years ago. It is therefore appropriate for Somerleyton Marina Ltd to consider their options for development to capitalise on this situation and provide for an increased employment and tourism offer.

### **Planning History**

- 2.22 The planning history available from the Broads Authority website is as follows:
- Replacement of existing quay heading  
Crown Cruisers Ltd Brickfields Somerleyton Lowestoft Suffolk NR32 5QW  
Ref. No: BA/2000/6187/HISTAP | Received: Thu 14 Dec 2000 | Validated: Thu 14 Dec 2000 | Status: Approved with conditions
  - Construction of additional boat building shed  
Ripplecraft Boatyard Brickfields Somerleyton Lowestoft Suffolk NR32 5QW  
Ref. No: BA/1995/6186/HISTAP | Received: Tue 10 Oct 1995 | Validated: Tue 10 Oct 1995 | Status: Approved with conditions
  - Construct new moorings basin  
Boatyard Adj Brickfield Cottages Somerleyton Lowestoft Suffolk NR32 5QW  
Ref. No: BA/1990/6203/HISTAP | Received: Mon 12 Feb 1990 | Validated: Mon 12 Feb 1990 | Status: Application Withdrawn

- Extension to provide toilets, office etc.  
Boatyard Adj. Brickfield Cottages Brickfields Somerleyton Lowestoft  
Suffolk NR32 5QW  
Ref. No: BA/1989/6185/HISTAP | Received: Mon 20 Mar 1989 |  
Validated: Mon 20 Mar 1989 | Status: Approved with conditions
- Conversion of existing store to holiday cottage  
Boatyard Adj. Brickfields Cottages Somerleyton  
Ref. No: BA/1989/6184/HISTAP | Received: Thu 09 Mar 1989 |  
Validated: Thu 09 Mar 1989 | Status: Application Withdrawn

2.23 The plans in Appendix 5 taken from the 1990, 1995 and 2000 planning records show how future development of this site might be pursued.

### 3.0 National Planning Policy Context

- 3.1 National Planning policy is contained in the National Planning Policy Framework (The Framework.).
- 3.2 In a Ministerial Statement in March 2011 made by Greg Clarke known as Planning for Growth he stated: *“The Government’s top priority in reforming the planning system is to promote sustainable economic growth and jobs. Governments clear expectation is that the answer to development and growth should wherever possible be “yes,” except where this would compromise the key sustainable development principles set out in national planning policy.”* This emphasises that the reform of the planning system since 2011 has been focused on delivering jobs.
- 3.3 The Framework states that there are three dimensions to sustainable development, being an economic, social and environmental role.
- *“an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
  - *a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and*
  - *an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.”*
- 3.4 The Framework contains 12 principles for planning. These include that planning should *“proactively drive and support sustainable economic development to deliver industrial and business units,”* to objectively meet the business needs of the area and to *“respond positively to wider opportunities for growth.”*
- 3.5 An important part of The Framework are the policies which seek to secure economic

growth. It states (paragraph 18) *“the government is committed to securing economic growth in order to create jobs and prosperity,”* and (paragraph 19) *“Planning should operate to encourage and not act as an impediment to sustainable economic growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.”* The Framework states (paragraph 21) that existing business sectors should be supported and planning should take into account whether they are expanding or contracting.

- 3.6 The Ministerial Statement and the Frameworks economic policies provides significant support for the development which will create employment, secure economic growth, and which will directly meet the needs of three local businesses. Particularly important is paragraph 19 which it states that *“significant weight”* should be placed on the need to support economic growth.

## 4.0 Broads Local Plan Challenges and Opportunities

- 4.1 The Issues and Options consultation documents sets out a number of principal sustainability challenges and opportunities that the new local plan will need to address and the Broads Authority invites comments on them.
- 4.2 The Somerleyton Marina is well placed to help the Broads Authority respond to relevant
- 4.3 A number are relevant to the aims and aspirations of Somerleyton Marina and these are set out below:

### Strengths

- 4.4 The following strengths are related to the marina and boatyard:
- ***High level of interaction with the surrounding area, with complementary provision of facilities and opportunities. For example, employment and development opportunities, community facilities, etc. in surrounding districts, towns and city serve also Broads residents; while the Broads provides recreational and business opportunities to those from a wider area***
  - ***Thriving hire boat industry contributing to the local economy***
  - ***Substantial engaged community of private boat owners***
- 4.5 Because of its location adjacent to Somerleyton village and the close proximity of the rail station the marina and boatyard site has the high level of interaction with the surrounding area listed above as a strength in the Broads area.
- 4.6 The thriving boat hire industry will benefit from the retention and safeguarding of the Somerleyton boatyard by the Somerleyton Estate and the future use of this boatyard will benefit the increased number of private boat owners with a resultant benefit to the local economy.

### Opportunities

- 4.7 The following opportunities are related to the marina and boatyard:
- ***Potential for revival in the use of the area's rivers and railways for freight and passenger traffic***
  - *Changes in patterns of recreation and expectations of visitors, including impacts of earlier major decline in hire boat fleet and **growth of private boat ownership**; higher expectation of facilities for leisure plots, holiday chalets and other accommodation*
  - ***Training opportunities for traditional skills and crafts***
- 4.8 The opportunities listed above relates directly to the Somerleyton marina and boatyard site. The close proximity of the Somerleyton railway station means the marina is well placed to respond to the growth I private boat ownership and the recovery of the tourism industry.
- 4.9 The Somerleyton Marina is an existing and sustainable interchange site between the rail, road and waterways.
- 4.10 The site is very well placed to maximise on the future potential for expansion of the private boat moorings and for the benefits to extend into the local economy and the boatbuilding and repair industry locally as well.

## **5.0 Adopted Local Planning Policy**

- 5.1 The adopted local planning policy background for the Broads Local Plan Review is as follows.

### **Core Strategy**

- 5.2 The Broads Core Strategy includes a range of issues to be addressed, strategic objectives and policies relevant to the marina and boatyard.
- 5.3 Of the 'Issues to be Addressed' by the Core Strategy the following are pertinent:

- Development, the economy and sustainable communities
  - The regeneration of the local economy in general and the boat building and hire industry in particular
- Tourism and recreation
  - Promotion of tourism development
  - Making the existing tourism product more sustainable
  - Promotion of development which is compatible with sustainability objectives to support the boating industry

- 5.4 The following strategic objectives of the Core Strategy remain relevant now:

- SO6 To support the tourism and recreation industries which underpin the viability of the local economy and encourage enjoyment of the area
- SO7 To provide a safe, secure and accessible transport system that supports sustainable tourism
- SO8 To further the economic and social wellbeing of communities within the Broads by promoting sustainable forms of economic development
- SO9 To achieve social and economic regeneration through the protection, maintenance and development of the local economy,



support for opportunities for investment in innovation and diversification, and promotion of high quality, accessible and sustainable development to meet future needs

5.5 The vision and objectives of the Core Strategy relevant to the marina and boatyard are addressed through the following Core Strategy planning policies. Those relevant to the marina and boatyard are set out below.

5.6 We have highlighted policy wording which we consider is key to supporting the marina and boatyard now; and should be taken forwards in new planning policy.

5.7 As discussed further below these strategic policies, when revisited for the new local plan, need to be more positively worded to better champion the strategic objectives and to reflect national planning policy. Please see relevant footnotes.

5.8 CS9 Sustainable Tourism:

*The tourism base in the Broads will be supported, widened and strengthened by:*

*(i) Encouraging a network of tourism and recreational facilities throughout the system and **protecting against the loss of existing services;***

*(ii) **Protecting waterside employment sites to contribute to the local economy;***

*(iii) Incorporating employment uses in new schemes;*

*(iv) Supporting diversification of tourism where economically and environmentally sustainable; and*

*(v) Promoting low-impact tourism.*

5.9 CS10 Gateways:

*Gateways and entrances between the Broads and settlements will be created and those already existing will be enhanced.*

5.10 Supporting text to CS10 of particular relevance here stated that:

*A hierarchy of gateways and entrances offering a range of facilities will reinforce the identity of the Broads to visitors. Development to support visitors will be located in settlements associated with the gateways or major entrances according to their size and accessibility. Access should be by land*

or water. [...] At major moorings and **key visitor attractions**, encouragement will be given to improving public transport information and services.

5.11 CS16 Access and Transportation<sup>7</sup>:

*Improvements to transportation to, and to access facilities within the Broads will be sought in a manner and at a level which is compatible with sustainability objectives. **Integration between alternative modes of transport will be sought to encourage visitors to arrive and travel within the Broads via sustainable modes of transport.** Within the area particular improvements required include:*

- (i) The improvement of access to and views of the waterside by the introduction of additional footpaths and cycle ways;*
- (ii) **The promotion of access to enjoy the built, historic and cultural landscape; and***
- (iii) The creation of links from settlements.*

5.12 CS18 Rural Sustainability:

*Development will be located to protect the countryside from inappropriate uses to achieve sustainable patterns of development, **by concentrating development in locations: (i) With local facilities; (ii) With high levels of accessibility; and (iii) Where previously developed land is utilised.***<sup>8</sup>

5.13 CS19 Rural Sustainability:

*Where development seeks to attract more than a small-scale or local level of visitors, it must be accessible by means other than the private car, be located at strategic positions throughout the area where it can be accessed by water and land, and be linked to settlements.*

5.14 CS22 Economy:

***In order to support and strengthen the local and rural economy, sites and properties in employment uses will be protected from redevelopment resulting in a loss of employment, by:***

- (i) Supporting and promoting appropriate diversification, subject to there*

<sup>7</sup> It is crucial to bear in mind the close proximity of the Somerleyton rail station to the boatyard and marina when considering this policy.

<sup>8</sup> CS18 could be re-used with the following addition: '...iv and where extensions to existing facilities minimised the impact of new infrastructure'.

*being no consequent adverse local impacts;*

*(ii) Strengthening a skilled workforce in the marine and tourism industries and in specialist craft skills on which the distinctive character of the Broads relies; and*

*(iii) Supporting and promoting employment in nature conservation.*

5.15 CS23 Economy:

***A network of waterside sites will be maintained throughout the system in employment use, providing:***

***(i) boating support services;***

***(ii) provision of visitor facilities;***

***(iii) access to the water;***

***(iv) wider infrastructure to support tourism;***

***(v) recreational facilities; and***

***(vi) community facilities.***

***Limited redevelopment of boatyards and other waterside employment sites for tourism or leisure-based operations will be permitted, subject to retention of a network of boating services and to the use for employment purposes of the major part of the sites.***

5.16 In advance of the prescriptions of the NPPF the adopted Broads Core Strategy set a reasonably positive, if at times precautionary, framework for planning for economic development; i.e. employment use should be ‘maintained’ rather than ‘enhanced’ or ‘supported’.

5.17 It recognised the importance of the boat building industry for employment and as a support industry for tourism. One of the issues the Core Strategy sought to address was the regeneration of the local economy in general and the boat building and hire industry in particular. This was before the economic downturn beginning with the 2008 global financial crisis.

5.18 The focus of the Core Strategy was, understandably, towards the protection of existing employment sites, but conspicuous by its absence was any strategic approach to encouraging the expansion of existing sites. This

needs to be addressed in this local plan review in order to comply with national planning policy and guidance requiring the planning system to, amongst other things, proactively drive sustainable economic development.

#### **Site Specific Policies**

- 5.19 The Broads Site Specific Policies Local Plan document did not contain a site specific policy for Somerleyton Marina.
- 5.20 Bearing in mind the excellent linkages between the Somerleyton marina and boatyard site and the employment, tourism, heritage, rail and local services we are of the opinion this should be revisited.
- 5.21 A flexible site specific planning policy for Somerleyton marina could provide the policy context for improving the tourism offer via increased private moorings and the employment element through supported and enhanced boatyard services.

#### **Development Management Policies**

- 5.22 The Broads Development Management Policies Local Plan document contains policies which are relevant to Somerleyton Marina and the owner's future development aspirations. Key elements of these policies, were they carried forward into new planning policies, would continue to provide positive policy guidance. This is discussed below and in Section 5.
- 5.23 It will be crucial for the Broads Authority to pick up these positive and flexible elements through new planning policies in order to reflect national planning policy and guidance.
- 5.24 DP16 Moorings:

*In accordance with the Mooring Strategy (2009), **new moorings will be permitted where they contribute to the network of facilities around the Broads system in terms of their location and quality.***

***Proposals for new moorings, including mooring basins, marinas or reconfigured mooring basins will be permitted where:***

***(a) They would be located where they would not have a negative impact on navigation (for example in an off-river basin or within a boat yard);***

*(b) The proposed development would not have an adverse effect on landscape character or protected habitats or species and would meet the requirements of the Water Framework Directive;*

*(c) There is provision for an adequate and appropriate range of services and ancillary facilities, or adequate access to local facilities in the vicinity;*

*(d) The proposed development would not prejudice the current or future use of adjoining land or buildings; and*

*(e) The proposed development would not adversely affect the amenity of adjoining residents.*

*In addition, proposals for development at or within commercial basins or marinas should:*

*(f) Not result in the loss of moorings available for visitor/short stay use;*

*(g) Not have an adverse effect on European habitats or species and meet the requirements of the Water Framework Directive;*

*(h) Provide new visitor (short stay) moorings at not less than 10% of total new moorings provided with a minimum provision of two;*

*(i) Make adequate provision for car parking, waste and sewage disposal and the prevention of pollution;*

*(j) Provide for the installation of pump-out facilities (where on mains sewer) unless there are adequate alternative facilities in the vicinity; and*

*(k) Provide an appropriate range of services and ancillary features, unless there is **access to local facilities within walking distance**.*

*Any purpose-built wash down facility provided in a mooring basin or marina should enable the filtration and re-use of waste water from the washing of boat hulls.*

#### **5.25 DP19 Business Diversification:**

*Business or farm diversification to provide a range of employment uses will be permitted where:*

*(a) The uses proposed are complementary in scale and kind and support the original business or farm operation;*

*(b) There is no loss of local or visitor facilities;*

*(c) The proposed uses would not have an unacceptable impact on the local transport network; and*

*(d) The proposal is in accordance with the Core Strategy and other policies*

*of the Development Plan.*

*New build development as part of a business or farm diversification will only be permitted when it can be demonstrated to the satisfaction of the Authority that the diversified use cannot be accommodated through the conversion of an existing building. In the case of farm diversification [...]. In the case of proposed diversification, redevelopment or change of use of commercial waterside sites, including boatyards, development proposals will be determined against Policy DP20.*

5.26 DP20 Development on waterside sites in commercial use, including boatyards:

*Proposals for the diversification, redevelopment or change of use of a waterside site in commercial use will be permitted when:*

- (a) **The proposed use is an employment or commercial use that is complementary in scale and kind with existing waterside commercial uses;***
- (b) **The proposed use would not prejudice a return to boatyard use; and***
- (c) **The proposals form part of a comprehensive scheme for the site that retains the site as a unified management unit.***

*Within existing boatyards, the development of new boatsheds and other buildings to meet the operational requirements of the boatyard will be permitted. The development of new buildings or uses for other employment purposes within boatyard sites will be permitted provided that:*

- (d) **The development would involve a subsidiary part of the yard;***
- (e) **The site is large enough to accommodate the different uses in a manner that would not conflict with each other, and would not have a significant adverse effect on adjoining uses and occupiers;***
- (f) **Existing visitor and boating facilities, such as moorings and access to the waterside, are maintained; and***
- (g) **Storage of potentially polluting material, e.g. oils, is proposed and implemented in such a way that pollution is avoided, including during flood events.***

*Development proposals should, as far as practicable, ensure that waterside commercial uses, including construction activity, avoid increased sedimentation and disturbance to the waterways.*

- 5.27 The Development Management policies set out above provide a positive criteria based approach to the provision of new mooring basins, marinas and the extension and diversification to boatyards but the overarching Core Strategy policies need to be more positive to properly reflect the strategic objectives and inspire confidence in land owners and developers. This may simply have been because they were written before the NPPF was published.
- 5.28 It will be necessary for the Broads Authority to fully reflect the thrust of national planning policy in terms of the emphasis on driving sustainable economic development in order for new strategic policies to set a sufficiently positive framework for decision making using new Development Management policies.

## 6.0 Response to Issues and Options Consultation

- 6.1 In this section we appraise the policy options being consulted on by the Broads Authority. The Issues and Options consultation document states that:

*The 1997 Local Plan was clear in stating that employment proposals inside development boundaries was acceptable in theory and that proposals outside of development boundaries would only be permitted under certain circumstances (relating to boatyards and farm diversification for example). DP22 of the Development Management DPD only refers to residential development in relation to development boundaries. DP25 also refers to development boundaries in relation to residential moorings. According to DP21, employment is potentially an acceptable use when converting buildings in the countryside. **But there is no policy approach regarding where new employment development is acceptable.***

- 6.2 This may be true of general employment areas but as described above existing Development Management policies DP19 and DP20 provide for new employment uses related to waterside sites and boatyards. DP16 provides guidance on new moorings/marinas.

- 6.3 The Issues and Options consultation document recognises the contribution provided by tourism and boatyards to the viability of communities:

*Tourism drives the economy of the Broads and is a key product in the wider economy of the East of England. **It benefits hire boat operators and boatyards, shops, restaurants, holiday accommodation, cafes and a wide range of attractions catering for visitors. A thriving tourism based economy brings additional customers to support riverside amenities, shops, pubs, restaurants.** Key facts and figures are:*

- The tourist economy of the area was estimated at £594million in 2014, and directly supported more than 7,660 FTE jobs.*
- Much of this tourism is water related with around 12,325 boats on the Broads (in 2014; 10,818 private craft and 1,507 hire craft) but many people also enjoy birdwatching, walking, angling and just being near the water.*



*The boatyard industry has been subject to major change over the past 15 – 20 years leading to the loss of a number of waterside boatyards. There has been a decline/potential stabilisation of the number of hire boats and **an increased private boat ownership**. The increase in private boat ownership can offer an opportunity for the provision of other services, such as boatbuilding, repair and maintenance, in addition to maintaining demand for re-fuelling, pump-out and mooring facilities. This can increase the diversity and robustness of the sector. In a wider context, the boatyards also contribute to the viability and prosperity of communities, through local spending and employment opportunities.*

- 6.4 As stated above Somerleyton Marina Ltd are looking to achieve a future policy context that is flexible and positive towards the potential extension of the Somerleyton marina and boatyard supporting and responding to the demands of economic development and tourism.
- 6.5 As we have identified above; existing strategic objectives and Development Management policies DP16, DP19 and DP20 in particular currently provide a clear and positive framework but work is needed to bring them in line with more up to date national planning policy.
- 6.6 Despite recognising the importance of marinas and boatyards to economic prosperity the Issues and Options consultation document does not identify the need to provide policy guidance on the identification, recognition, development and expansion of existing sites. Issue 38 deals with redundant boatyards and is not relevant to the aspirations for Somerleyton Marina.
- 6.7 Issue 39 questions how the Broads Authority should address the location of new employment land and this is the closest to the matter we are concerned with.

#### **Issue 39 Option 1**

- 6.8 Option 1 proposes to continue the approach in the Development Management DPD. As we set out above we would find this approach acceptable on the proviso that the new strategic policies were more positive and went further than they often do in ‘maintaining’ employment sites by ‘encouraging’ their expansion in circumstances

where it is shown to be sustainable to do so. I.e. Somerleyton marina and boatyard.

- 6.9 For example CS23 states *“a network of waterside employment sites will be maintained throughout the system in employment use...”*. A simple but effective addition to this policy would be to say *“a network of waterside employment sites will be identified, maintained and enhanced/promoted throughout the system in employment use...”*. Therefore at Somerleyton Marina the potential expansion of the marina and the boatyard could be encouraged rather than the status quo maintained.
- 6.10 This approach would respond to *“the increase in private boat ownership can offer an opportunity for the provision of other services, such as boatbuilding, repair and maintenance, in addition to maintaining demand for re-fuelling, pump-out and mooring facilities”* discussed in the Issues and Options document.
- 6.11 It would also reflect the sustainable location and the proximity to facilities and services in the village of Somerleyton nearby.

#### **Issue 39 Option 2**

- 6.12 Option 2 proposes to reintroduce the approach taken to new employment sites reportedly taken in the 1997 local plan; which was to allow employment development in principle inside [residential] development boundaries and to resist it elsewhere unless it related to ‘certain circumstances’ such as ‘boatyards’<sup>9</sup>.
- 6.13 Insofar as Somerleyton Marina are concerned the reintroduction of the approach taken in the 1997 Local Plan would only be acceptable if the earlier policy exception for ‘certain circumstances relating to boatyards’ was included.
- 6.14 Otherwise, being outside of any development boundary and unlikely to feature in any future development boundary, sustainable expansion of the existing employment offer at the marina and boatyard could find itself contrary to local planning policy.
- 6.15 The Broads Authority would also need to satisfy themselves that the approach taken in the 1997 local plan was compliant with current national planning policy imperatives.

<sup>9</sup> P103 of the Broads New Local Plan Issues and Options Consultation Document February 2016

### **Issue 39 Option 3**

- 6.16 Option 3 proposes to identify existing employment sites and to allocate land for this use.
- 6.17 Somerleyton Marina could accept this way forward provided that, if a site specific approach were taken, a hierarchy of sites were developed that allowed smaller rural employment sites such as Somerleyton marina and boatyard to come forwards and be recognised for its sustainable characteristics.
- 6.18 The criterion based approach discussed against Option 3 would be favourable to Somerleyton Marina if it contained updated policy criteria from DP16, DP19 and DP20. Any less than this and we could not support it. However recognising that such a policy would need to be applicable to many different types and sizes of sites this approach may be impractical.
- 6.19 It is conceivable that a site specific policy, such as that for St Olaves in the adopted Site Specific Policies DPD, could be written for Somerleyton marina providing a bespoke framework for its expansion.
- 6.20 It is acknowledged that a Call for Sites would need to be undertaken and contextual information and evidence would need to be provided to support this approach.

### **Our Preferred Option**

- 6.21 Given that existing Development Management policies are broadly acceptable in their current form as a means to judge the future potential expansion of the marina and boatyard at Somerleyton, and on the proviso of more positively worded strategic policies, we would prefer Option 1 as a means to guide and support our clients development aims.
- 6.22 Option 3 would require a greater amount of input and therefore be less efficient than Option 1. Plus Option 3 includes a degree of uncertainty at this stage about whether and how generalised criteria intended for all employment sites could apply to Somerleyton marina. Equally if a site specific approach were taken, whether a size threshold might mean Somerleyton marina were excluded, despite its sustainability credentials. We would prefer Option 1 over Option 3.
- 6.23 Option 2 could be acceptable but the risk to Somerleyton marina that the boatyard exception criteria were missed out or poorly worded is too great at this stage to lend

this Option any support. We would prefer Option 3 over Option 2 and then Option 1 over Option 3. I.e. our preferred ranking of the options with the most preferable first is:

- Option 1 (preferred) maintain the approach in the Development Management DPD on the proviso that the strategic policies were more positively worded.
- Option 3 could be supported provided a bespoke site specific policy for Somerleyton marina and boatyard were adopted.
- Option 2 could only be supported if the boatyard exception were retained.

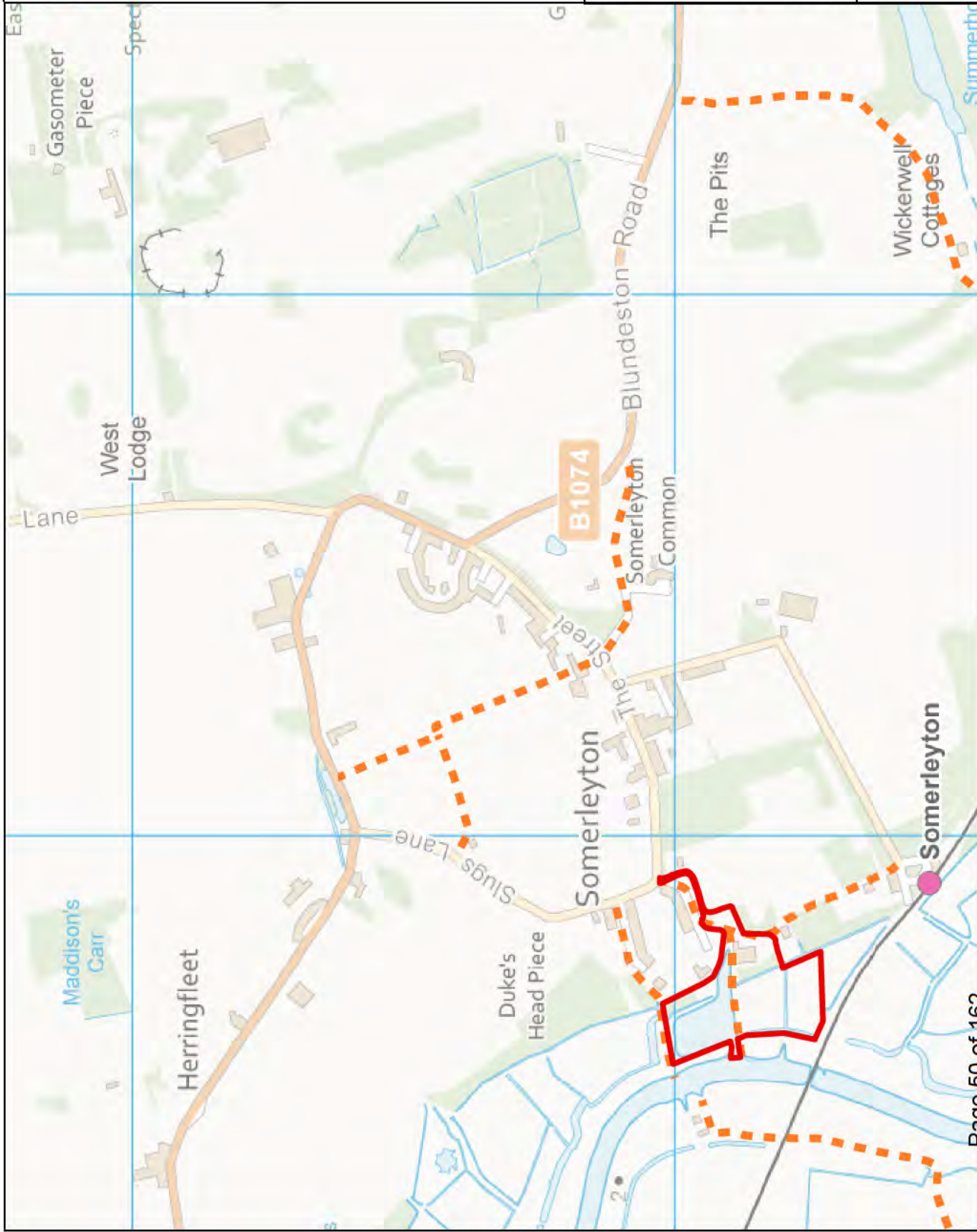
6.24 We look forward to discussing the needs of Somerleyton marina and boatyard with the Broads Authority as they develop these policy options and move towards a preferred option which we can support and which would support the sustainable economic development of this well placed employment and tourism asset.

## 7.0 Conclusion

- 7.1 Somerleyton marina and boatyard has a long and rich history of innovation and endurance. It has remained while other boatyards elsewhere on the Broads have gone. This endurance ensures the continued retention of skilled crafts *“on which the distinctive character of the Broads relies”*<sup>10</sup>.
- 7.2 Somerleyton marina and boatyard is well located in relation to the village of Somerleyton which provides facilities and services to the users and customers of the marina and boatyard.
- 7.3 Somerleyton Hall and Gardens are also a prime tourist attraction and the close proximity of the Somerleyton rail station means the marina and the Broads beyond is easily accessible by sustainable modes of transport.
- 7.4 We have outlined the future potential expansion of the private mooring marina and the resultant increase in boatyard services and facilities. In order to take the Somerleyton marina and boatyard forwards Somerleyton Marina Ltd require a positive and clear planning policy framework against which to judge investment risk.
- 7.5 The Broads New Local Plan provides an opportunity for Somerleyton Marina to engage in the plan making process with the Broads Authority in order to provide a policy context conducive to investment and development.
- 7.6 The Broads Authority have set out three options for new employment site planning policy. Our preferred option at this stage is Option 1. This is because the existing Development Management policies are themselves positively worded providing a clear framework for decision making. Their present application is guided by strategic policies and these are too often focussed on ‘maintenance’ of the employment sites rather than driving their sustainable economic development as required by national planning policy.
- 7.7 For these reasons the longevity and sustainable characteristics of the Somerleyton marina and boatyard should be recognised and supported through a new positive planning policy landscape; from which future potential economic development can emerge.

<sup>10</sup> CS22 Point ii.

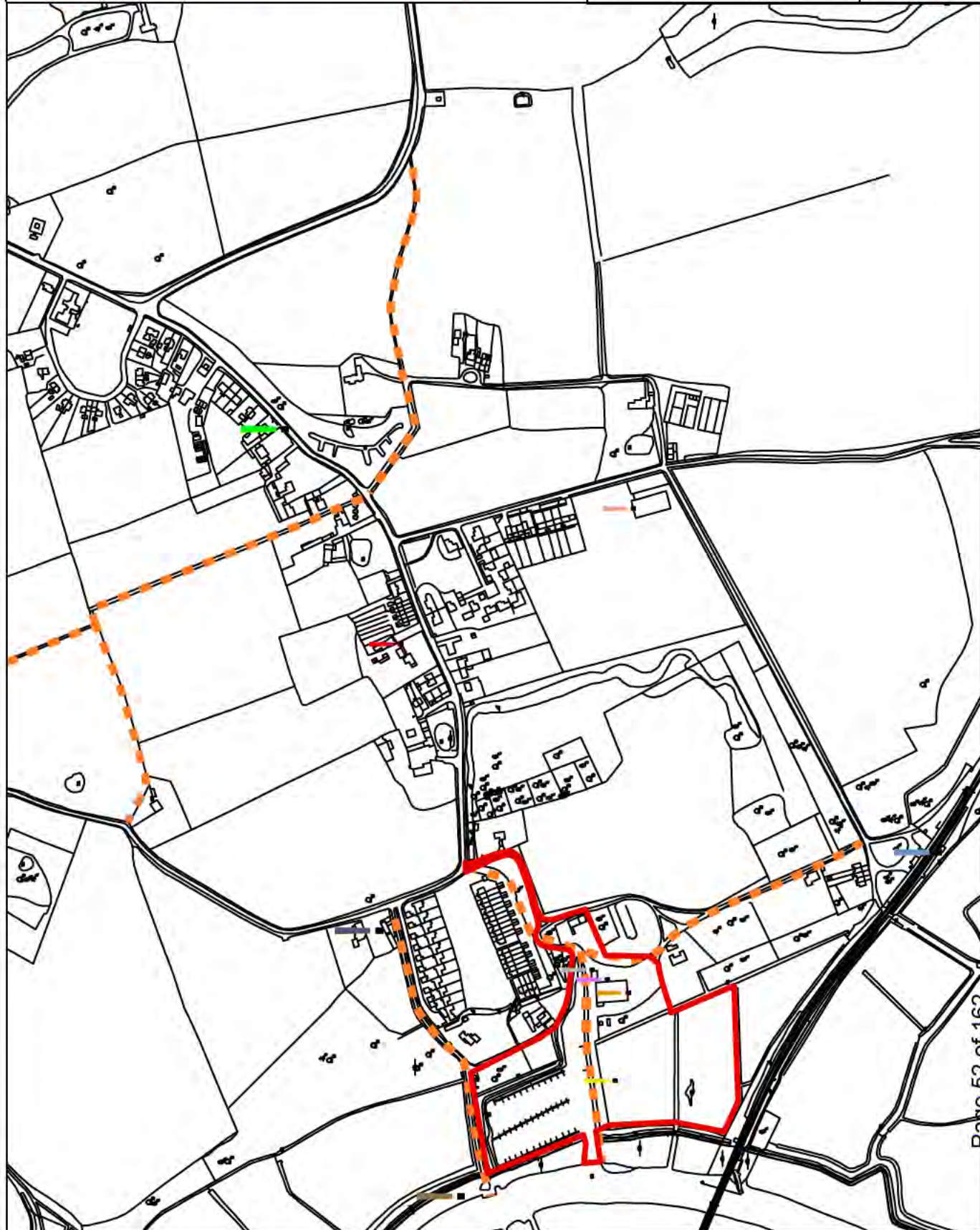
## Appendix 1



<b>Key</b>	Marina and boatyard	Footpath	Link to The Broads Link to Rail Station Link to Village, Hall & Gardens		
<p>Project: Somerleyton Marina</p>					
<p>Drawing title: Somerleyton Marina Connections</p>					
<p>Drawing no: E374/BLPR3</p>					
<p>Rev. 0 Date: March 2016</p>					
<p>Scale: 1:10,000@A4 Drawn: SB</p>					

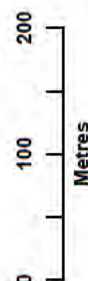
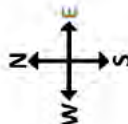
## Appendix 2





**Key**

- Marina and boatyard
- 24 Hour Public Moorings
- Boat Repairs
- Hard Stand / Storage
- Lift In / Out
- POS & MUGA
- Post Office & Village Shop
- Public House
- Rail Station
- Slipway
- Village Hall
- Footpath



Project: Somerleyton Estate

Drawing title: Somerleyton Sites and Facilities

Drawing no: E374/BLPR2

Rev. 1

Date: March 2016

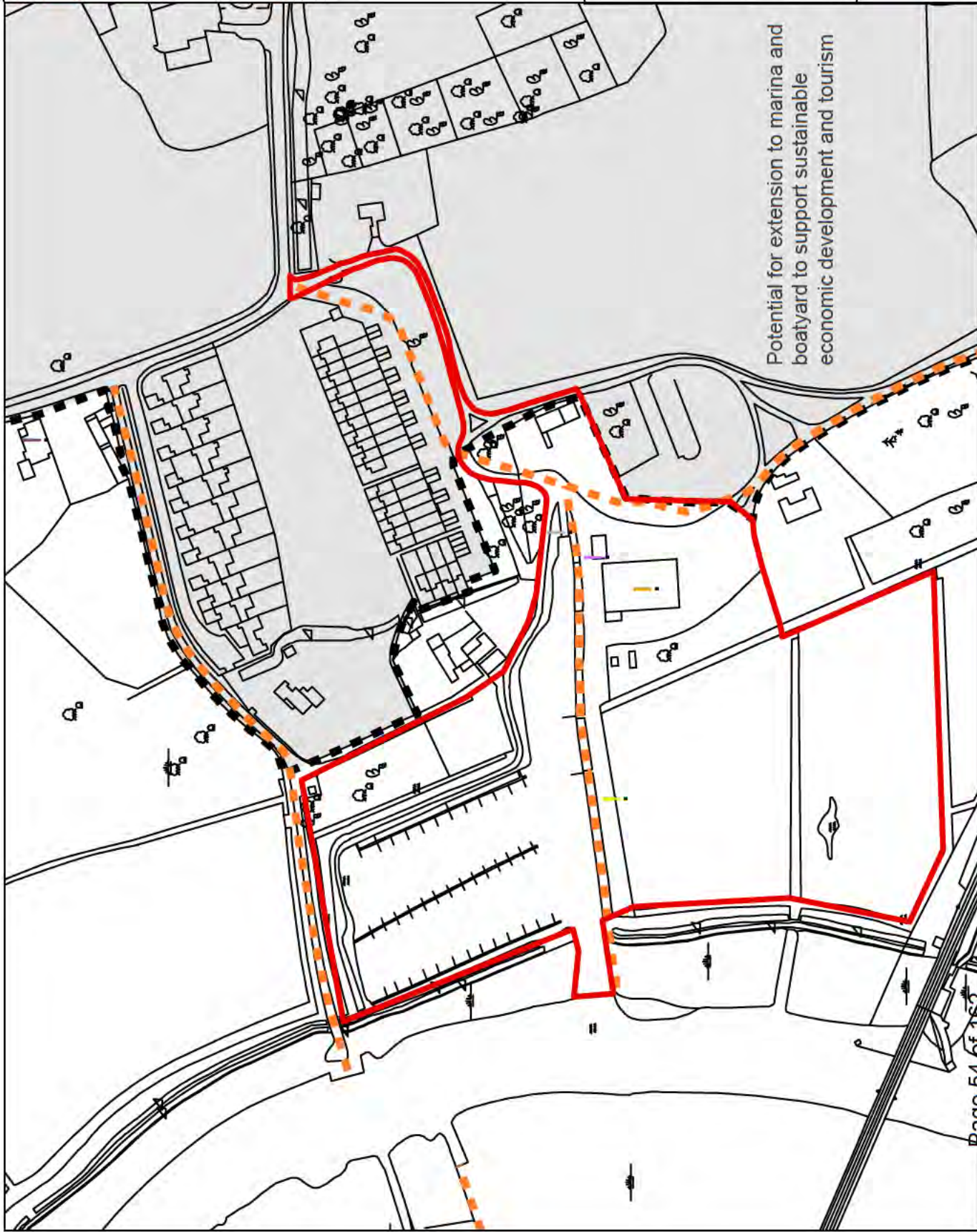
Scale: NTRS

Drawn: SB



## Appendix 3





# Key

Marina and boatyard

Boat Repairs

Hard Stand / Storage

Lift In / Out

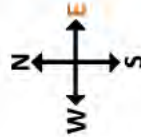
Public House

Slipway

Footpath

Broads

Waveney



Project Somerleyton Marina and Boatyard

Drawing title: Somerleyton Marina & Facilities

Drawing no E374/BLPR1

Rev 0 Date: March 2016

Scale: 1:2500 at A4 Drawn:

**Evolution**  
town planning

## Appendix 4



# Village Profile: Somerleyton, Ashby & Herringfleet

Published May 2014



Population  
**427**



Dwellings  
**208**



Area  
**14** sqkm



Town centre  
**10** km

## Key Facilities



x1 Food Shop



x1 Post Office



x1 Public house



x1 Meeting place



x1 Primary school



## Typical home



Detached



3 bedrooms



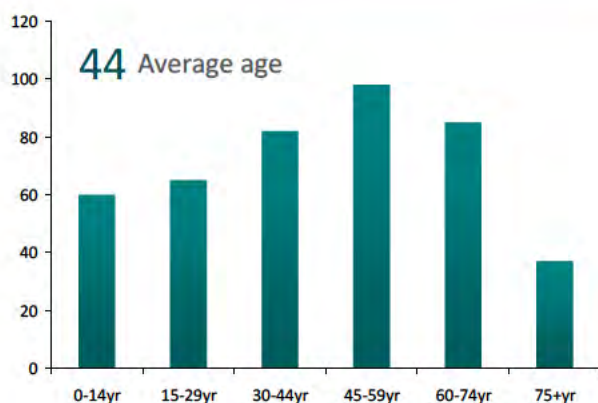
2 people



6 rooms

'Rooms' includes kitchen, living rooms, bedrooms, utility rooms, includes a double garage excludes bathrooms, porches and sheds

## Age



## Gender



211 male



216 female

## Ethnicity

Ethnicity broad bands	Percentage
White	96.7%
Mixed	1.9%
Asian	1.4%
Black	0%
Other	0%

## Households

## House types and new homes



Detached  
houses or  
bungalows



Semi-detached  
houses or  
bungalows



Terraced houses  
or bungalows



Total number of new homes 2001-2013

## Tenure

Tenure	Percentage
Owned	50%
Shared ownership (part owned and part rented)	0%
Social rented	5%
Private rented	44%
Living rent free	2%

## Dependent children



24%

households with dependent children

## Occupancy of bedrooms

Number of bedrooms	Percentage of households
Households who have 2+ bedrooms more than they require	48%
Households who have 1 bedroom more than they require	38%
Households who have the number of bedrooms they require	13%
Households who have 1 bedroom fewer than they require	1%
Households who have 2+ bedrooms fewer than they require	0%

## Employment

## Main employment industries

by employed residents



14%

Human health and social work activities



11%

Wholesale and retail trade; repair of motor vehicles



9%

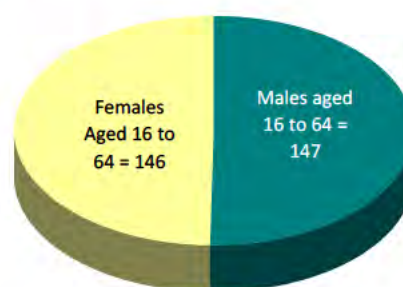
Construction



9%

Manufacturing

## Working age population



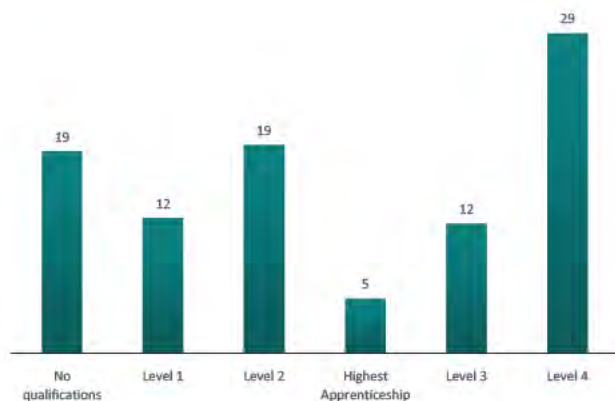
## Socio Economic Classification

Classification	Percentage of residents
High managerial and professional occupations	15%
Lower managerial, administrative and professional occupations	23%
Intermediate occupations	11%
Small employers and own account workers	13%
Lower supervisory and technical occupations	9%
Semi-routine occupations	11%
Routine occupations	10%
Never worked or are long-term unemployed	4%
Occupations status is not classified	5%



## Education

## Qualifications



## Level 1 examples

Fewer than 5 GCSEs at grades A-C, foundation GNVQ, NVQ 1

## Level 2 examples

5 or more GCSEs at grades A-C, intermediate GNVQ, NVQ 2

## Level 3 examples

2 or more A-levels, advanced GNVQ, NVQ 3

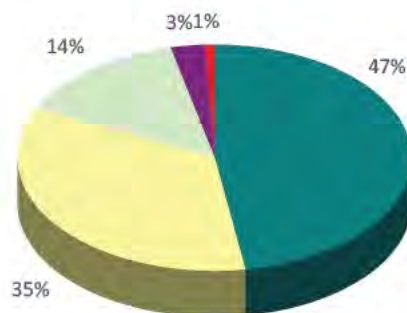
## Level 4 examples

HND, Degree and Higher Degree level qualifications

## 16-18 year olds not in education, employment or training

Jun 2013	July 2013	August 2013	September 2013	October 2013
9%	9%	9%	10%	0%

## Health



■ Very good health   
 ■ Good health   
 ■ Fair health  
■ Bad health   
 ■ Very bad health

## Transport



327 cars

1.6 cars per dwelling

## Sources and further information

## Sources

Data sourced from Suffolk Observatory (Census 2011) except Waveney District Council - area, town centre, facilities, new homes.

Please note - data from the 2011 Census was produced by the Office for National Statistics using a 'best-fit' method. Consequently, the data does not necessarily map exactly to parish boundaries.

Figures may not tally due to rounding.

## Further information

[www.suffolkobservatory.info](http://www.suffolkobservatory.info)

The Suffolk Observatory is the one-stop-shop for data, statistics and reports about Suffolk.

[www.ons.gov.uk/census](http://www.ons.gov.uk/census)

Census 2011 official website.

[www.neighbourhood.statistics.gov.uk](http://www.neighbourhood.statistics.gov.uk)

Government website containing local statistics.

[www.statistics.gov.uk](http://www.statistics.gov.uk)

Data on economy, population and society at national and local level.

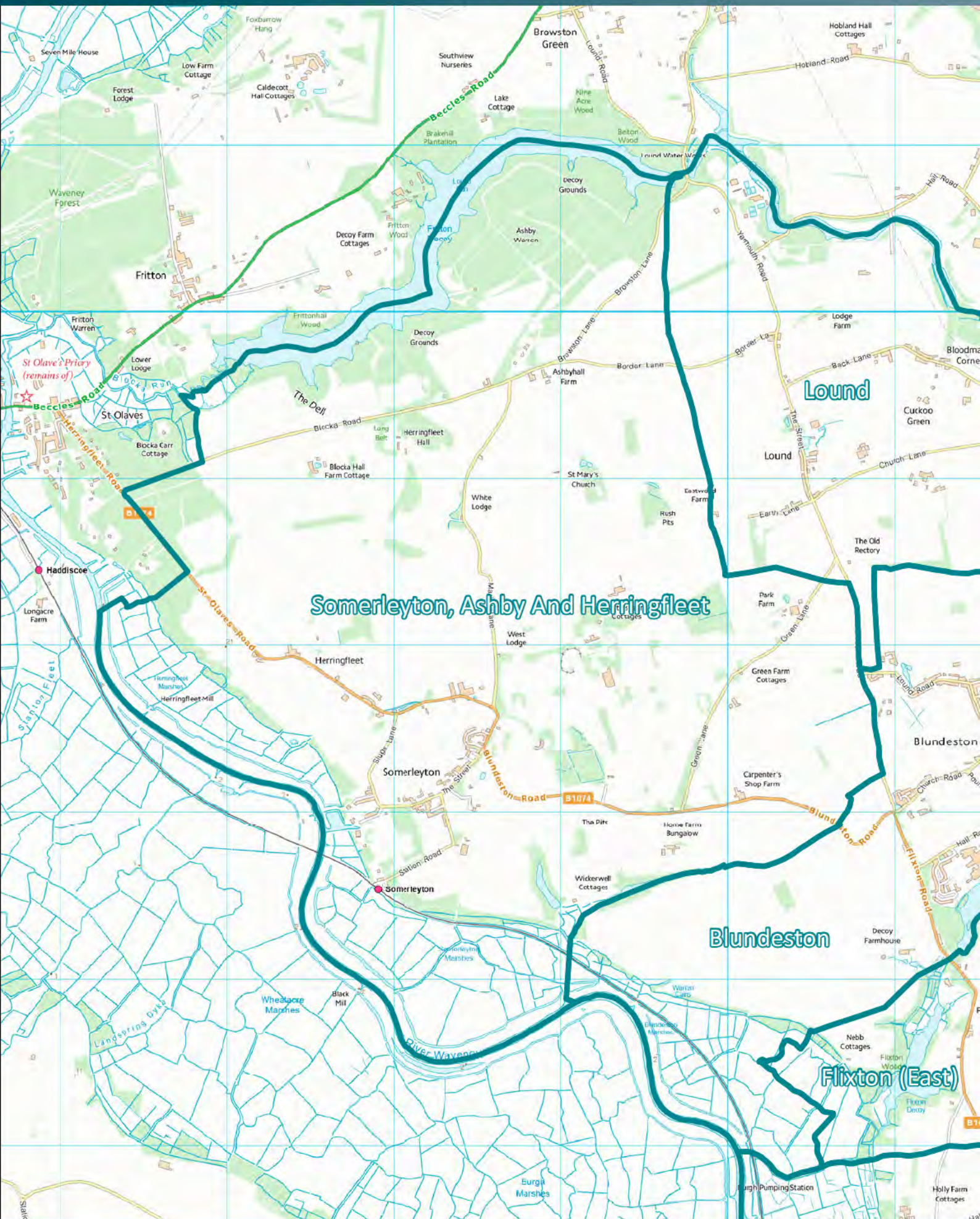
This village profile contains a selection of data available for Parish and Towns in the District as of May 2014. Whilst every effort is made to ensure the accuracy of data it can not be guaranteed free of errors.

Profiles for other villages in the District can be found online at:

[www.waveney.gov.uk/neighbourhoodplanning](http://www.waveney.gov.uk/neighbourhoodplanning)

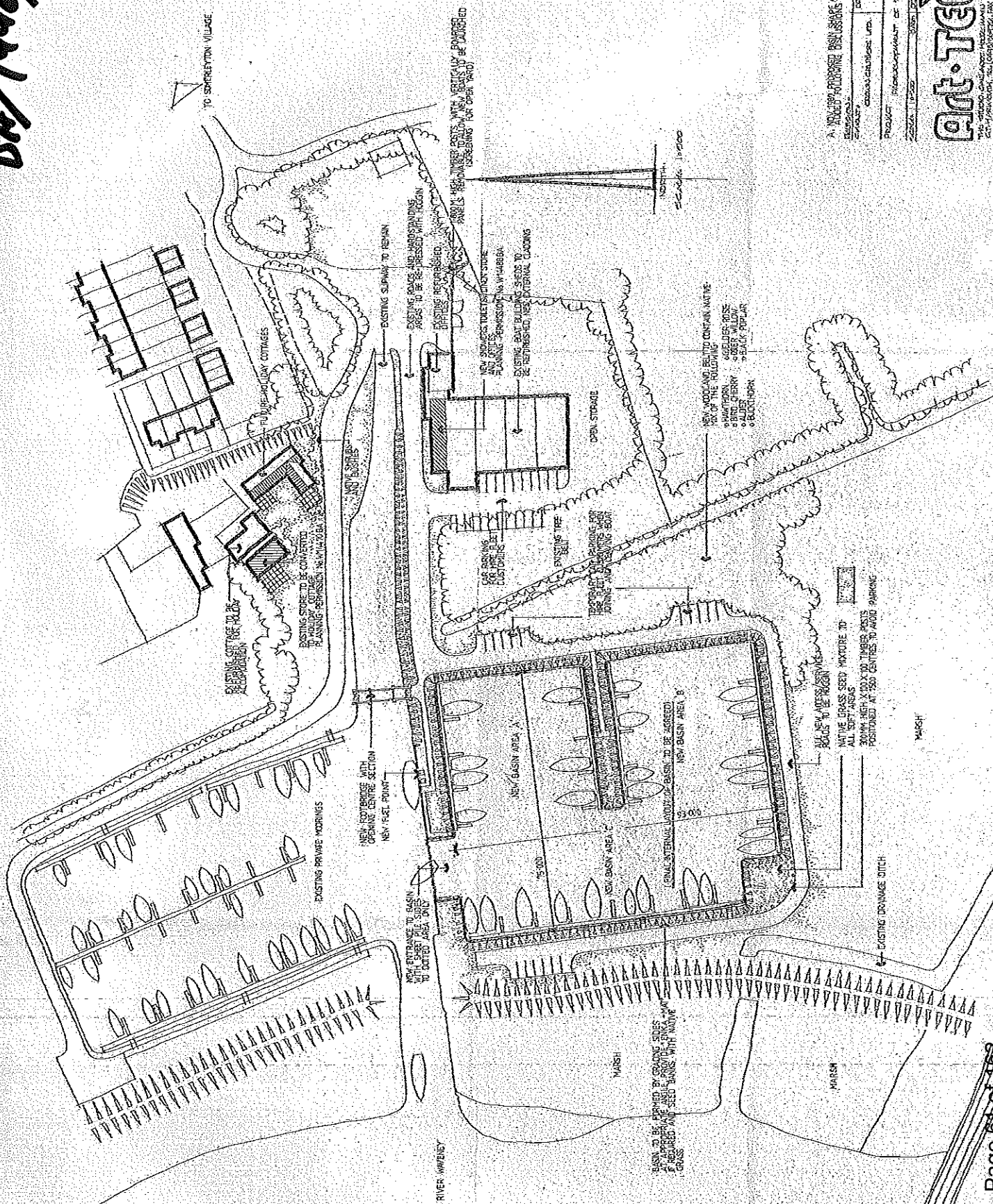


# Village Profile: Somerleyton, Ashby & Herringfleet









A. NOV 1989, PROPOSED BASIN SHAPE AMENDED AND LANDSCAPING DETAILS ADDED FOLLOWING DISCUSSIONS WITH BRAD'S AUTHORITY

RECEIVED	COMMUNICATIONS UNIT	DATE: MAR 1968
FROM:		
SUBJECT:		

PROD. PROCEEDINGS OF THE UNITED STATES

Canada - 10-500	Spain - 10-500	Denmark - 10-500	Sweden - 10-500
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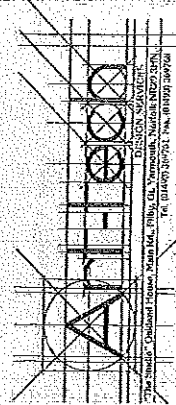
**Art-Tech** 1065  
RUMFORD, N.T. A

drawing on the expertise of Art+Tech (Design Services) and can be implemented

[illegible]

THE COATED PAPER, WITH GLASSING  
COLOUR TO BE SUPPLIED WITH BOARD'S AUTHORITY.

THE COATED PAPER, AND KARENGUARDS,  
COLOUR TO BE SUPPLIED WITH BOARD'S AUTHORITY.

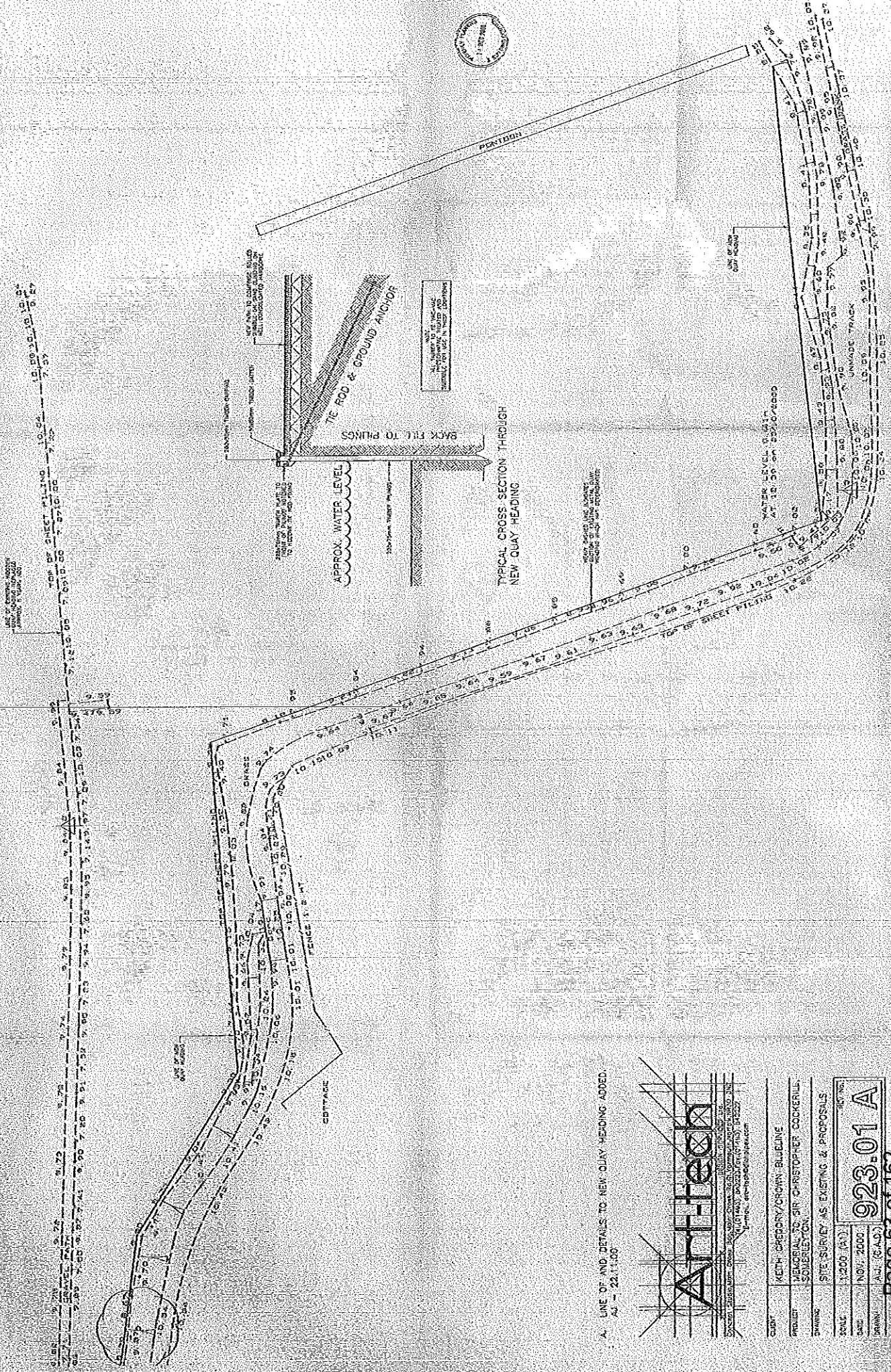


CROWN BLUE - LINE	PROPOSED ADDITIONAL BOORBUILDING SHEED	PROPOSED PLANS & ELEVATIONS	1 / 100	SEPT. 1995	6 B
DATE:	DRAWN:	SCALE:	DRAWING:	DATE:	DRAWN:



28/2000/6182

Do not scale  
Do not copy  
Do not alter  
Do not add  
Do not delete  
Do not change  
Do not move  
Do not rotate  
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Do not scan



A. LINE OF AND DETAILS TO NEW QUAY HEADING ADDED.  
A2 - 22/11/00

**Art-tech**

Specialist Surveying & Mapping Services  
100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 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**Lottie Carlton**

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**From:** John Clements [REDACTED]  
**Sent:** 07 April 2016 12:58  
**To:** Planning Policy Mail  
**Cc:** David C. Glason  
**Subject:** GYBC Response to Broads Local Plan Issues & Options Consultation

Dear Natalie,

Thank you for consulting Great Yarmouth Borough Council on the Broads Local Plan Issues and Options.

The Borough Council congratulates the Broads Authority on its clear, nicely presented and seemingly comprehensive consultation document, and is supportive of the generality of it.

The Borough Council's officers offer the following specific comments (in the order presented of the consultation document), and would be happy to discuss any of these if it would be helpful.

**Page 14. The Community of the Broads**

The map of indices of deprivation gives a misleading view of the nature of the local resident population. (See comment on Appendix A, below.)

**3.9 Access & Recreation**

Access and recreation in the Broads can contribute to the health and quality of life of residents of neighbouring areas, especially important for those in towns and deprived populations. You may wish to add reference to this.

**5: Duty to Cooperate**

Great Yarmouth Borough Council is satisfied by the cooperation undertaken by the Broads Authority, and looks forward to continuing to cooperate on strategic and other issues of mutual interest.

**6: Challenges and Opportunities.**

The Borough Council agrees with the generality of the issues identified.

**9.3 Play, Open Space (land), Allotments and our Constituent Authorities**

The footnote (no.15) refers to the Great Yarmouth Core Strategy being at examination in May 2015. It was adopted in December 2015. Site Allocations, as well as the Development Management Policies mentioned, are currently in preparation.

**17.3 Tranquility**

The types and speeds of movement in the landscape is another important dimension of tranquillity, and you may wish to mention this. (It may be of relevance to the A47 Dualling at 26, below.)

**26.4 A47 Dualling**

The dualling of the Acle Straight has long been an ambition of the Borough Council, and is important for the long term health of industries in the Borough which are important to the wider and national economy.

Whilst the Borough does not disagree that the dualling has some potential for significant adverse impacts, but there are also benefits which could potentially be achieved as part of the development, and the approach to the dualling could be framed in a more positive way. (That there is a rare species in the vicinity of the existing road would seem to indicate that development and the environment are not as incompatible as commonly assumed.)

For example, tree or other screening of the vehicles (especially their lights) on the road is now largely absent, but could potentially be included as part of the development of a dual carriageway, achieving a net gain for the landscape and tranquillity. (It is understood that when the Acle Straight was originally constructed it was lined for its entire length with (pollarded) willows, primarily for the consolidation of the road embankment by their roots, but also resulting in significant screening of traffic. Sadly, these trees have now been lost for most of the Straight's length, as has occurred elsewhere in and around the Broads.)

As another example, low noise road surface would help reduce traffic noise.

Hence the Borough Council considers that it could be appropriate for the Broads to have a policy which supported the development of the dualled road, subject to realistic criteria for appropriate protections and enhancements of the area's special qualities.

## **26.6 The Integrated Access Strategy**

The Borough Council supports the objectives of the current Strategy to improve access links to local settlements, and to improve links between public transport provision and visitor destination points and access routes. Broads recreation has the potential to be an even greater contributor than at present to the health and quality of life for residents in surrounding areas such as Great Yarmouth (some of whom suffer severe deprivation), and access improvements could help realise some of that potential.

## **26.8 Safeguarding and Protecting Recreation Routes**

The Borough Council is sympathetic to the proposal to protect the remaining undeveloped parts of the former railway trackway between Great Yarmouth and Fritton/St.Olaves. The Borough Council is keen to work with the Broads Authority to explore the recreational potential of these routes, and will consider protecting those parts of the route within the Borough Council's planning area in its own future Local Plan documents.

## **20.2 Housing**

The Borough Council considers that the constraints and special qualities of the Broads mean that it is unlikely to be desirable to provide significant housing within the Broads. It accepts that some, perhaps all, of any need arising within that part of the Broads within Great Yarmouth Borough should be met in those parts of the Borough outside the Broads.

Indeed, the Borough Council and Broads Authority have a Memorandum of Understanding to this effect, and the planned housing growth in the Borough Council's adopted Core Strategy is based on the 'objectively assessed needs' for the whole of the Borough, including that part within the Broads. There is therefore no need for the Broads Local Plan to provide for that part of its 'objectively assessed need' relating to the Great Yarmouth Borough part of the Broads.

That is not to say that there will not be opportunities for housing development in the Broads that would benefit the local community, provide environmental enhancements, or strengthen the sustainability of settlements. The Borough Council is keen to liaise with the Broads Authority to investigate whether there may be such opportunities in those settlements that straddle the boundary between the two planning authorities.

Where housing does come forward in the Broads part of the Borough, either through allocations or as 'windfall' permissions, the Borough Council anticipates continuing the practice of counting these towards the whole Borough housing targets, as provided in the Memorandum of Understanding.

Having said that, the scale of the Broads' housing needs suggested in Appendix E is surprisingly high (notwithstanding the text suggesting it is low). As no calculations are shown it is not clear how the figures have been arrived at, and whether the unusually extreme age and socio-economic structure of the Broads population has been adequately factored in.

## **20.5 Settlement Hierarchy and Development Boundaries**

The Borough Council would be keen to liaise with the Broads Authority to ensure complementary development boundaries in settlements which straddle the shared planning boundary.

## Appendix A

The maps in Appendix A (and the similar maps used elsewhere in the document) misrepresent the Broads population they are intended to characterise, and are based on a fundamental methodological error.

In each of the areas by which the indices of deprivation are mapped, the Broads population (if any) is only a tiny fraction of the total. The Broads population's characteristics are obscured by the prevalence of the very different types of populations outside the Broads which, in most cases, comprise the vast majority of the population being measured and indicated by area.

The population of the Broads has been shown by work undertaken by the Broads Authority itself, based on that Census data which is available specifically for the Broads Area, to be distinct from that of the wider county. It is very predominantly elderly, well educated, having high levels of car ownership, home ownership, outright home ownership, and with a large proportion of retirees but with a substantial proportion of those who are in work in higher employment groups. These characteristics can be taken to indicate low levels of deprivation.

There is also no observable evidence on the ground that the population within the Broads varies in the way the maps appear to indicate.

I hope the above comments are helpful in further developing the plan. Should you wish to discuss any of the above, please do not hesitate to contact me.

Regards,

John

**John Clements**  
**Principal Strategic Planner**  
**Great Yarmouth Borough Council**

Direct Dial [REDACTED]

[www.great-yarmouth.gov.uk](http://www.great-yarmouth.gov.uk)

2<sup>nd</sup> Floor, Town Hall, Hall Plain, Great Yarmouth, Norfolk, NR30 2QF

Respondent: Health and Safety Executive

Strategy and Projects Officer  
Planning Policy Officer,  
Broads Authority,  
Yare House,  
62-64 Thorpe Road,  
Norwich NR1 1RY

Hazardous Installations Directorate

**John Moran**

CEM HD5E

<http://www.hse.gov.uk/>

Howard Harte – Head of Unit

Date Tuesday, 05 December 2017

Dear Ms Conti,

## CONSULTATION ON YOUR LOCAL PLAN – REPRESENTATIONS BY HSE

## Broads Authority Public Consultations: Broads Plan and Broads Local Plan

Thank you for your request to provide a representation on the Broads Authority Public Consultations: Broads Plan and Broads Local Plan consultation document. When consulted on land use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved.

We have concluded that we have no representation to make at this stage of your local planning process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed. In the absence of this information, HSE is unable to give advice regarding the compatibility of future developments within the consultation zones of major hazard establishments and MAHPs located in the area of your local plan.

Planning authorities are advised to use HSE's Planning Advice Web App to verify any advice given. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Please see the advice note below for further information on the Web App including accessing the package.

## Future Consultation with HSE on Local Plans

HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process, and that we may be able to provide advice on development compatibility as your plan progresses. Therefore, we would like to be consulted further on local plan documents where detailed land allocations and use class proposals are made; e.g. site specific allocations of land in development planning documents. Please send any future request for consultation to:

## The Administrator – Local Plans



HID CEM HD5



or by e-mail to:



If you have any questions about the content of this letter, please contact us at the address given.

Yours faithfully



John Moran

HM Specialist Inspector of Health and Safety (Risk Assessment)

## **ADVICE NOTE: HSE LAND USE PLANNING POLICY AND LOCAL PLANS – SOURCES OF INFORMATION**

HSE recognises that there is a requirement for you to meet the following duties in your plan, and that consultation with HSE may contribute to achieving compliance:

1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents
2. Regulation 10(1)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended<sup>1</sup> requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment by pursuing those objectives through the controls described in Article 13 of Council Directive 2012/18/EU (Seveso III)<sup>2</sup>. Regulation 10(c)(i) requires that regard also be had to the need, in the long term, to maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes

To assist you in meeting these duties, information on the location and extent of the consultation zones associated with major hazard establishments and MAHPs can be found on HSE's extranet system along with advice on HSE's land use planning policy. Lists of all major hazard establishments and MAHPs, consultation zone maps for establishments, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access HSE's Planning Advice Web App; further information is available on HSE's website: <http://www.hse.gov.uk/landuseplanning/padhi.htm>. When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of the Web App could assist you in making informed planning decisions about development compatibility.

### **Identifying Consultation Zones in Local Plans**

HSE recommends that where there are major hazard establishments and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence.

### **Identifying Compatible Development in Local Plans**

The guidance in HSE's Land Use Planning Methodology, available at <http://www.hse.gov.uk/landuseplanning/methodology.pdf> will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major

<sup>1</sup> Amended by r.33 - Schedule 5 of The Planning (Hazardous Substances) Regulations 2015

<sup>2</sup> Article 13(1) provides that Member States shall ensure that the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment are taken into account in land use policies or other relevant policies. They shall pursue those objectives through controls on: (a) the siting of new establishments; (b) modifications to establishments covered by Article 11; and (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting or developments may be the source of or increase the risk or consequences of a major accident

hazard establishments and MAHPs based on the methodology. The sections on *Development Type Tables* and the *Decision Matrix* are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.

## Appendix F – Residential Moorings – call for suitable areas

**Are there any areas which you think are suitable for residential moorings which meet the criteria as set out below?**

If so, please fill out this form with details of areas you feel are suitable for residential moorings. A separate form for each site. Please email the completed form, maps and photos to: [PlanningPolicy@broads-authority.gov.uk](mailto:PlanningPolicy@broads-authority.gov.uk) and title your email 'Residential Mooring Sites'.

<b>Your name:</b>  Simon Sparrow	<b>Your email address:</b>  <div style="background-color: black; height: 1.2em; width: 100%;"></div>	<b>Your phone number:</b>  <div style="background-color: black; height: 1.2em; width: 100%;"></div>
<b>Your address:</b>  <div style="background-color: black; height: 1.2em; width: 100%;"></div>		

▪ **What is the address of the proposed residential mooring?**

As above. Note that any residential moorings would be within the curtilage of the boatyard, the exact location would depend on the best location for the particular vessel concerned. Please see the map at the end of this document for the area for moorings (residential and leisure).

▪ **We must have a map to show us the area you refer to.**

Your map should show the boundary of the residential mooring (draw a line around it in a highlighter perhaps) as well as give the context to enable officers at the Broads Authority to find the site easily).

**Have you included a map?** ☒

▪ **Have you included photographs of the proposed residential mooring?** **No**

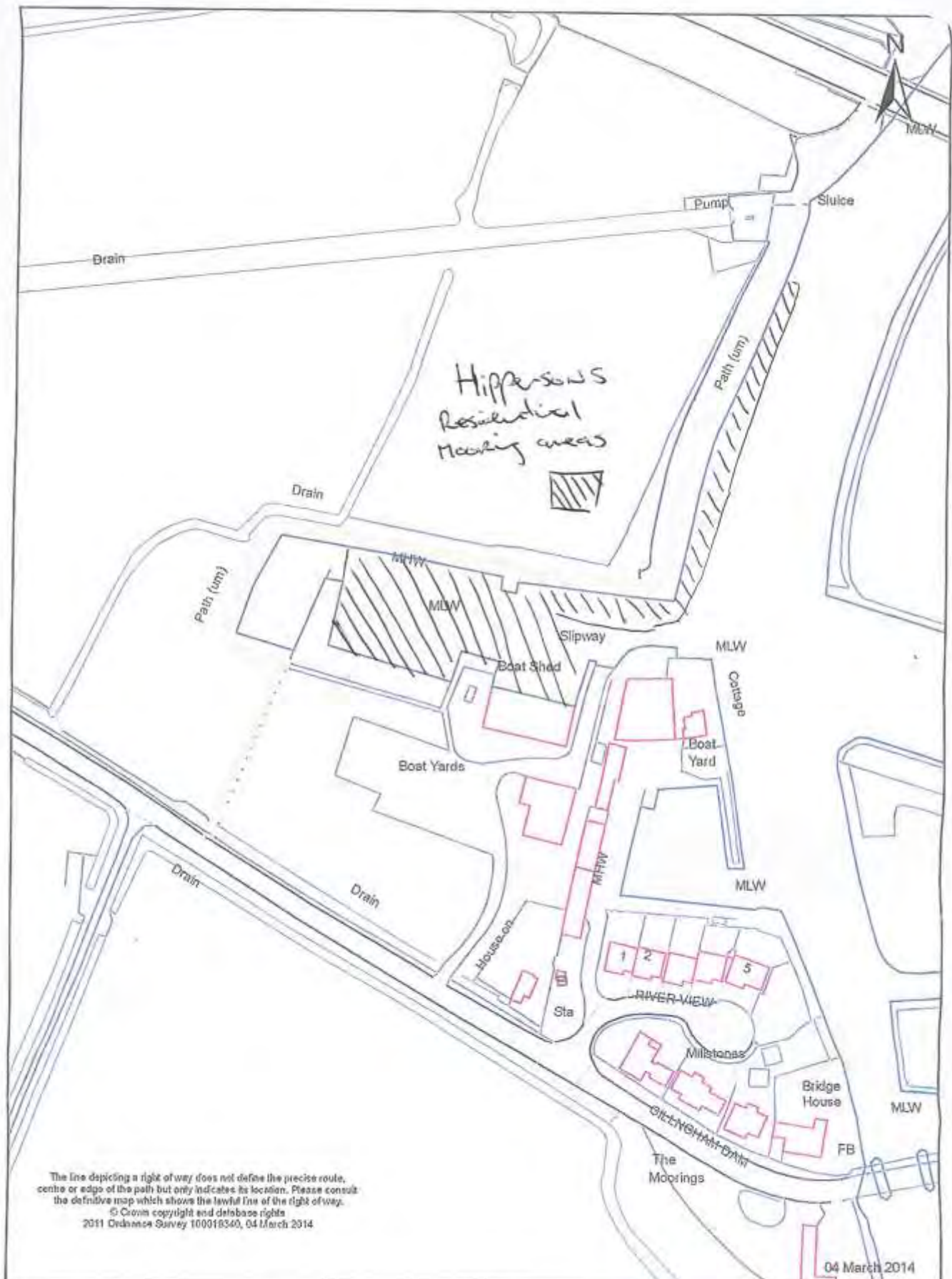
**Please explain how your proposed site addresses the following criteria:**

1: How many residential moorings or what length of residential moorings is proposed?	3 additional residential moorings. There is one residential mooring already.
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	H.E. Hipperson is located on the edge of Beccles, with the town being within easy walking or cycling distance. All the usual facilities of a small town are nearby, including schools, shops, churches, doctor and dentist surgeries.
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	There are existing moorings already in use by the boatyard, we are proposing a change of status to an additional three, rather than the creation of new moorings.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of	No, the majority of moorings are off the river in a private basin. The riverfront moorings are on a relatively wide stretch of the river. The vessel dimension byelaws would preclude a vessel large enough to cause

boats to pass?	navigation issues.
5: Is riverbank erosion an issue here? How would this be addressed?	No, the river frontage is piled and quay headed, as is the majority of the mooring basin
6: What are the adjacent buildings or land used for	Boat repairs and storage (including a wet shed)
7: What is the character or appearance of the surrounding area?	Rural in appearance generally, a well kept working boatyard adjacent to the moorings.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g. car park or park on road)?	Off street car parking is available on the site for a large number of cars.
10: How can service and emergency vehicles access the area safely?	Via the main driveway.
11: How would waste and sewerage be disposed of?	There are waste and recycling bins provided at the yard. Sewage is disposed of via a pumpout point at the yard. Vessels (both residential and otherwise) can have their waste tanks emptied here.
12: Is the area on mains sewerage?	Sewage from the site is pumped across the bridge to the Beccles sewerage system.
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No.
14: Do you own the site? If not who does and have you told them about your proposal?	Yes, we own the business that owns the site.
15: What is the current use of the site?	Boatyard.

Please note that:

- Your nomination will be assessed by the Broads Authority.
- We cannot guarantee that your nomination will be allocated for residential moorings as the nomination might not be suitable.
- Your nomination will be made public



Hipperson's Boatyard Gillingham Dam Gillingham - Search No. 7/3289/13

For reference purposes only - no further copies may be made.

**Norfolk County Council**  
Planning & Transportation GIS

Scale 1: 1500

Centred on 641950 281226

## Appendix F – Residential Moorings – call for suitable areas

**Are there any areas which you think are suitable for residential moorings which meet the criteria as set out below?**

If so, please fill out this form with details of areas you feel are suitable for residential moorings. A separate form for each site. Please email the completed form, maps and photos to: [PlanningPolicy@broads-authority.gov.uk](mailto:PlanningPolicy@broads-authority.gov.uk) and title your email 'Residential Mooring Sites'.

<b>Your name:</b> Simon Sparrow	<b>Your email address:</b> [REDACTED]	<b>Your phone number:</b> [REDACTED]
<b>Your address:</b> [REDACTED]		

▪ **What is the address of the proposed residential mooring?**

The land is adjacent to Hippersons Boatyard. The mooring basin is connected to Hippersons mooring basin. See map at the end of this document.

▪ **We must have a map to show us the area you refer to.**

Your map should show the boundary of the residential mooring (draw a line around it in a highlighter perhaps) as well as give the context to enable officers at the Broads Authority to find the site easily).

**Have you included a map?** ☐

▪ **Have you included photographs of the proposed residential mooring?** **No**

**Please explain how your proposed site addresses the following criteria:**

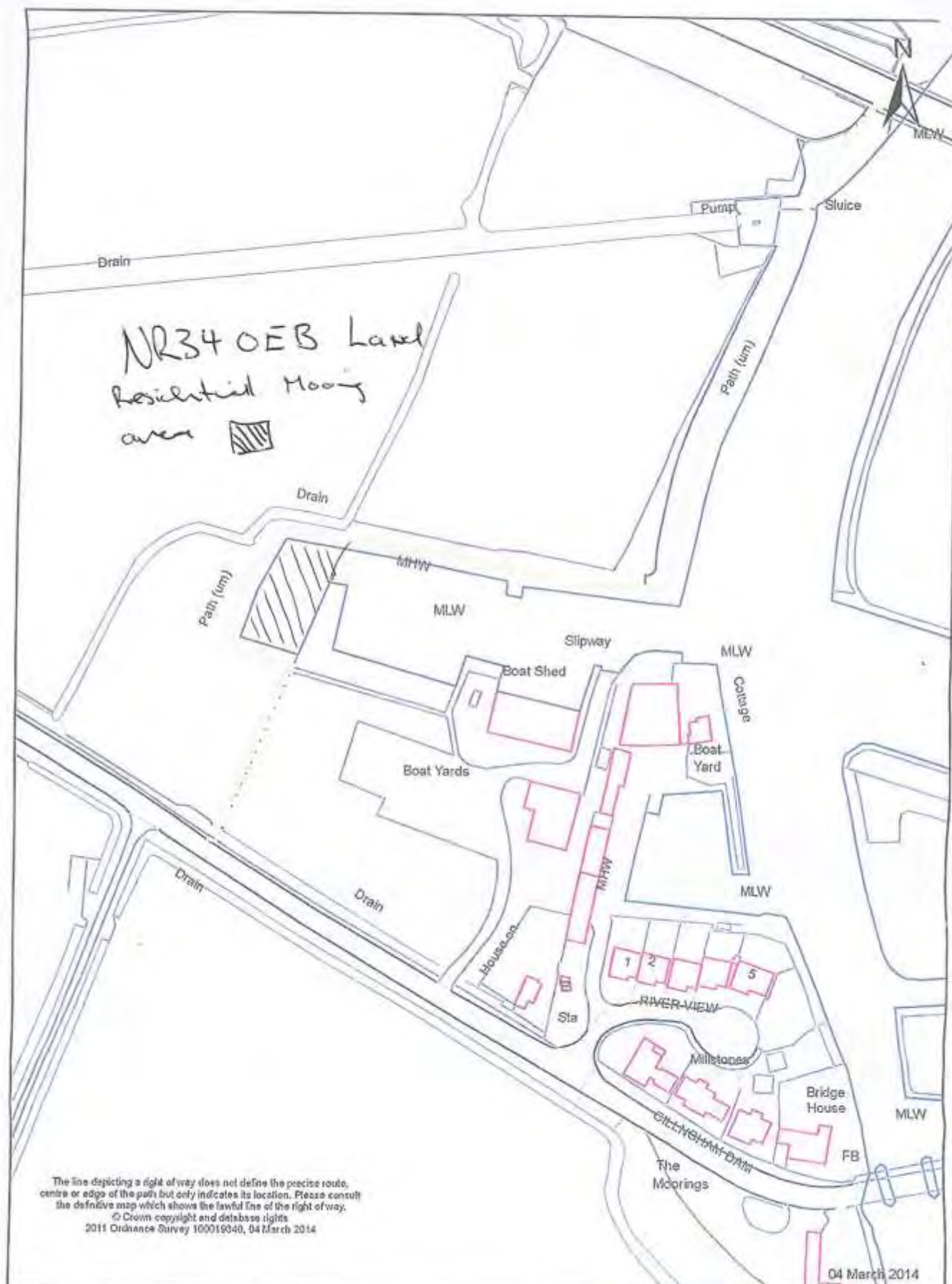
1: How many residential moorings or what length of residential moorings is proposed?	1 residential mooring.
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	The land is located on the edge of Beccles, with the town being within easy walking or cycling distance. All the usual facilities of a small town are nearby, including schools, shops, churches, doctor and dentist surgeries.
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	There are existing moorings in use already.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No, the proposed location is a private mooring basin off the main river.
5: Is riverbank erosion an issue here? How would this be addressed?	No issues with riverbank erosion – see above,

6: What are the adjacent buildings or land used for	Boat repairs and storage (including a wet shed). The surrounding land is farmland used for cattle grazing.
7: What is the character or appearance of the surrounding area?	Rural in appearance generally, a well kept working boatyard adjacent to the property.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes
9: What car parking is there for people living on boats (e.g. car park or park on road)?	Off street car parking is available on the site.
10: How can service and emergency vehicles access the area safely?	Via the main gateway.
11: How would waste and sewerage be disposed of?	There are waste and recycling bins provided at the next door boatyard. Sewage is disposed of via a pumpout point at the yard. Vessels (both residential and otherwise) can have their waste tanks emptied here.
12: Is the area on mains sewerage?	No.
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No.
14: Do you own the site? If not who does and have you told them about your proposal?	Yes.
15: What is the current use of the site?	Amenity land and mooring.

Please note that:

- Your nomination will be assessed by the Broads Authority.
- We cannot guarantee that your nomination will be allocated for residential moorings as the nomination might not be suitable.
- Your nomination will be made public







Historic England

Natalie Beale  
Planning Policy Officer  
Broads Authority  
Yare House, 62-64 Thorpe Road  
Norwich, NR1 1RY

Our ref:  
Your ref:  
Date: 08 Apr 2016  
Direct Dial: 01223 582747

By e-mail to: [REDACTED]

Dear Ms Beale

**Ref: Broads Local Plan issues and options**

Thank you for consulting Historic England on the Issues and Options consultation for the Broads Local Plan. We also would refer you to our consultation response to the Broads Plan 2017, dated 7 April 2016.

Historic England has published a number of Good Practice Advice and Advice Notes which you may find useful in developing your local plan. In addition to the references to GPA 1-3 in the documents, we would particularly highlight:

Advice Note 3 – site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>.

As a general comment, we find the consultation plan well-presented and accessible. Our specific comments on the issues and options follow. Comments on the site-specific policies and interim sustainability appraisal will be sent separately.

We hope these comments are useful. We would be very pleased to discuss any of the matters we have raised in more detail.

Yours sincerely



**Dr Natalie Gates**

Principal, Historic Places Team

e-mail: [REDACTED]



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## HISTORIC ENGLAND'S COMMENTS AND SUGGESTED AMENDMENTS

### 3 About the Broads – spatial portrait

#### 3.3 The landscape of the Broads, pp10-1

We welcome this text which provides a succinct description of the integrated history of the man-made landscape and built environment of the Broads.

#### 3.6 Heritage and Culture of the Broads, pp12-3

We welcome this text. We recommend changing the title of the section to: *“The historic environment and culture of the Broads”*.

### 6 Challenges and Opportunities

#### Strengths, Weaknesses, Opportunities and Threats pp22-4

This section refers to *“cultural heritage assets”*. The terms *“cultural heritage”* and *“cultural heritage assets”* are used throughout the document. Because of the specific meaning within the National Planning Policy Framework (NPPF) of *“heritage assets”* and *“historic environment”* we would recommend that textual amendments are made to ensure consistency with the NPPF. For example: *“Extensive, diverse and very highly valued landscape, habitats, flora, fauna, **cultural and** heritage assets.”*

We welcome the identification of the attractive environment and the heritage assets. We would suggest that reference is made to palaeo-environmental and organic archaeological remains as these undesignated heritage assets are especially vulnerable and significant in the Broads.

We note the identification of heritage at risk in the area and the impact of climate change on heritage. We would suggest that archaeology is specifically identified as a potential loss through climate change.

### 7 Vision, objectives and existing policies

#### 7.1 Vision, p25

We note the identification of the special qualities of the Broads. We would suggest that the current bullet point: *“History: geoheritage, cultural heritage, skills, archaeology, traditions, historic structures”* is conflating two points which would best be separated into historic environment aspects and cultural heritage aspects, which can be tangible and intangible.

### 11 Climate Change

Mitigating against the projected effects of climate change is a considerable challenge to the special qualities of the Broads. We would expect that the evidence base for this



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section would include Historic England's advice *Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings* <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/>.

It should be noted that listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.

These considerations need to be taken into account when considering how best to mitigate against climate change in historic buildings and areas. Therefore, any policy coming forward should take into account its effect on such buildings and areas.

## 12 Peat

We welcome the identification of archaeology and palaeoenvironments in the introduction (please also refer to our comments on pp22-4 above) and the inclusion of the Wetland and Waterlogged Heritage Survey within the evidence base.

As policies are developed, consideration should be given to how potential archaeological deposits are conserved when faced with development proposals. This may include requiring archaeological assessments, given the high archaeological potential and limited archaeological information about the Broads. We note the irony of drafting a policy to protect peat when the Broads were formed through peat extraction.

## 13 Heritage and Historic Assets

We note that this section is primarily about the historic environment, although wider heritage issues are contained within it. As before, consistency with the NPPF in respect of the terms “*historic environment*” and “*heritage assets*” would improve clarity. If you wish to keep elements of the cultural aspects of the Broads in this section in the next iteration, we would suggest renaming the section “*Historic Environment and Cultural Heritage*”, however, we recommend that the cultural elements are separated from the historic environment and that this chapter is renamed “*historic environment*”.

### 13.1 Introduction, p55

We would recommend this specific textual change: “*The Broads has a rich and varied **historic environment** recognised by the statutory...*”



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We would recommend deleting the word “**landmark**” from the second paragraph as not all buildings, structures, historic landscapes or features that contribute to local character will be landmarks.

#### **Issue 8, p56**

We would welcome development of a policy on the Local List and undesignated heritage assets given the significance and uniqueness of the Broads and the vulnerability to various types of heritage assets from a variety of factors as outlined in the issues and options consultation.

#### **13.4 Drainage Mills, pp58-60**

We would recommend this textual amendment: “*drainage mills are a defining feature of the **historic landscape** of the Broads....*” We would welcome the development of a policy on drainage mills in principle, however, we note that these buildings and their locations pose particular difficulties and that the options suggested in the consultation document all have significant issues attached. We would recommend that further work and discussion, following the consultation, is undertaken to see if a realistic local policy is achievable.

#### **13.5 Archaeology, pp60-2**

We welcome the recognition of the Broads as an area of exception waterlogged heritage.

#### **13.7 Evidence, p63**

In addition to the documents already referred to, we would also direct you to Historic England’s Advice Notes 1-6.

HE Advice Note 1 – conservation area designation, appraisal and management:

<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>

HE Advice Note 2 – making changes to heritage assets:

<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

HE Advice Note 3 – site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

HE Advice Note 4 – tall buildings: <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

HE Advice Note 5 – setting up a listed building heritage partnership agreement:

<https://historicengland.org.uk/images-books/publications/eh-good-practice-advice-note-drawing-up-listed-building-heritage-partnership-agreement/>

HE Advice Note 6 – drawing up a local listed building consent order:

<https://historicengland.org.uk/images-books/publications/eh-good-practice-advice-note-drawing-up-local-listed-building-consent-order/>



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## 15 Renewable Energy

We welcome the Authority's consideration not to allocate land for wind turbines based on the effect on the Broads Landscape sensitivity.

## 16 Landscape Character

We note the chapter on landscape character and welcome references to archaeology and built heritage.

### Issue 18: settlement fringe, p80

We would recommend that Historic England's Advice Note 3 – site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/> forms part of the evidence for this chapter and informs your thinking on issue 18 and the development of policy.

## 20 Transport

We would expect consideration of the historic environment in any policy development for this section.

## 23 Navigation

We would note that the potential disturbance to, and loss of archaeological deposits should be considered when considering sediment management and bank erosion together with the necessary measures for assessment, protection or recording of remains. We also note that where historic bridges are liable to damage or potential pressure for alteration we trust that the advice of your conservation officer, and Historic England where appropriate, will be sought.

## 24 Housing

We welcome the recognition of the special qualities of the Broads in respect of design. We would expect to see locally-specific text and policies on design in respect of "*floating houses*" in the next iteration of the Broads Local Plan.

## 25 Design

We welcome the intention to update the building by the waterside design guides.

### 21.4 Energy Efficiency

Please refer to the comments we made above in respect of chapter 11 on climate change.



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Our ref: 2016 04 11 Broads  
Authority interim  
Sustainability  
Appraisal

Telephone

11<sup>th</sup> April 2016

By email only to: [planningpolicy@broads-authority.gov.uk](mailto:planningpolicy@broads-authority.gov.uk)

Dear Natalie,

**Historic England Comments on Broads Local Plan February 2016 Issues and Options Interim Sustainability Appraisal and on Broads Local Plan February 2016 Issues and options Section 32 Site Specific Policies.**

Please find attached comments in addition to the Historic England comments on the issues and options consultation dated 8<sup>th</sup> April 2016.

**Historic England Comments on the Broads Local Plan February 2016 Issues and Options Interim Sustainability Appraisal**

Historic England welcomes in principle the SA Objectives; *'To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.'* and *'to improve education and skills including those related to local traditional industries'.*

The planning authority have responded to previous comments as raised by Historic England when at the scoping stage and as,

- (1) To take account of Historic England guidance on Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment,
- (2) To take into account enhancements with the revision *'The process will seek to minimise any negative impacts but also seek to maximise any positive impacts'*
- (3) To convene an expert group to include the Council's heritage officer,
- (4) That baseline data will include numbers of heritage assets
- (5) To take into account the status and content of the PPS5 Practice Guide.
- (6) To progress a discussion of SA objectives with further dialogue with Historic England in January 2015.

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We now note that PPS5 Practice Guide has been superseded by National Planning Policy Guidance, Good Practice Guidance Notes (as produced by Historic England on behalf of the sector) and Advice Notes (as produced by Historic England).

We now note SA objective ENV4: *To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages* and ENV9: *To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings*. These are in response to our previous comments at scoping stage. Historic England welcomes this additional detail.

The reporting of positive and negative significant environmental effects is relatively easy to follow in the assessment of options, with SA objectives plotted against the options. As the document is taken forward we would welcome additional commentary in explanatory script at the bottom of each option. This will assist in orientation of the issues and it may be preferable that each SA objective is given a title as well, which can be added to the assessment tables. For example ENV9 would be '*cultural and heritage assets or simply heritage assets*'. This would reflect the specific meaning within the NPPF of heritage assets and the historic environment.

Where a question mark is denoted (unknown impact on SA objective), additional commentary in explanation of this uncertain outcome would be welcomed as the evaluation of options progresses.

The further development of issue 10 is to be supported in the production of a positive strategy for the conservation and enhancement of the historic environment. (*Issue 10: How can the Local Plan address interpretation of the historic environment and culture in the Broads?*)

Issue 43 / 44 / 45 relate to site allocations and we comment separately on these. We note that issue 44 at Thorpe Island has an unknown impact on SA objectives as they affect ENV 4 and ENV 9. The implications for the conservation area and nearby listed buildings will be the subject of further appraisal.

The current issues and options consultation includes other potential site allocations in addition to issues 43 / 44 and 45 and will be included in the SA as it progresses.

The baseline (appendix 4) reports at (g) Conservation Area Appraisals Reviewed and the number of Listed Buildings at Risk, plotted from 2011 to 2015. This level of detail is supported.

We support the inclusion of Heritage Counts in the literature review.



**Historic England Comments on Broads Local Plan February 2016 Issues and options Section 32 Site Specific Policies.**

Section 32 Site Specific Policies	Historic England Comments.
Issue 43 <i>How do we protect the car parking area near Staithe and Willow?</i>	<p>This allocation relates to the allocation of the existing car park which was previously allocated as open space under existing sites allocation HOR2.</p> <p>This allocation falls within the conservation area and any future works to the car park would need to take account of the requirements of conservation law and policy.</p> <p>Ivy House (grade II) lies to the east and is unaffected by this allocation amendment.</p>
Issue 44 <i>How to address Thorpe Island in the Local Plan?</i>	<p>Historic England understands that Policy TSA2 as applies to Thorpe Island is the only saved policy of the 1997 Local Plan. The current legal case will be very relevant to the future planning status of Thorpe Island. The detail of the policy will be important when seeking to protect the relationship between the attractive wooded backdrop and the conservation area.</p> <p>This site is located along the southern boundary of the Thorpe St Andrew conservation area. To the north and also within the conservation area a group of listed buildings sit between the River Yare and the Yarmouth Road, including Garden House (grade II*), the Kings Head Inn (grade II), the Town House Hotel (grade II), 18-20 Yarmouth Road (grade II), Walpole House (grade II*), the Manor House (grade II), Manor Cottage (grade II) and 10 Yarmouth Road (grade II).</p>
Issue 45 <i>Do we protect the live/work units at Ferry Corner through the Local Plan</i>	No historic environment issues appear to be raised by issue 45.
Other sites – noted as paragraph 32.5	This site is located on outskirts of the town and away from the conservation area to the north-

Beccles Old Hotel site	east. No historic environment issues appear to be raised by this potential allocation.
Bridge Hotel Potter Heigham	It is difficult to determine if this site is within or outside the Potter Heigham conservation area. Should this be progressed the allocations would need to denote this site on a plan.
Little Precinct in Hoveton	No historic environment issues appear to be raised by this potential allocation. Wroxham Bridge (scheduled monument) is located to the south but by some distance and this historic asset would be unaffected by any upgrading work to this shopping precinct. If the land is to come forward for redevelopment Historic England would require that consideration is given to the scheduled monument, to ensure its setting is protected.
Former Waterside Rooms at Hoveton	This site would appear to have potential to improve the surrounding townscape. This site does not appear to raise any issues involving the historic environment.
Former Loaves and Fishes pub at Beccles.	This site falls within the northern edge of the Beccles conservation area. Any policy details that emerge here will need to consider this relationship. This will mean that any development has a neutral or enhancing effect upon the character and appearance of the conservation area.

We hope that the above comments are of assistance.

Yours sincerely



Historic Environment Planning Adviser

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# IWA Consultation Response- Broads Local Plan 2012-2036

## Issues and Options Consultation

### Introduction

The Inland Waterways Association (IWA) is a registered charity, founded in 1946, which advocates the conservation, use, maintenance, restoration and development of the inland waterways for public benefit.

IWA members' interests include boating, towpath walking, industrial archaeology, nature conservation and many other activities associated with the inland waterways.

IWA works closely with navigation authorities, other waterway bodies, and a wide range of national and local authorities, voluntary, private and public sector organisations. IWA also has representation on the Broads Forum, and a number of members amongst residents and boaters using the Broads.

### Detailed Response

#### **Habitats Regulation Assessment**

This section states 'Of importance to the HRA of the Broads Local Plan is work currently being undertaken to understand the behaviour of visitors to various protected sites in Norfolk.' How is this work to be conflated with the results of this consultation? Will the impacts of the HRA be included at the time of the consultation on the draft local plan?

#### **Policy Context**

This section includes reference to recent disputes between the Broads Authority and residential boaters on Thorpe Island, the subject of legal action and saved planning policy TSA 2. IWA understands that discussions are continuing in the light of the outcome of the dispute. How are these discussions, and any conclusions or agreements, to be included in the local plan? See also comments on that section of this consultation.

#### **Thoughts on the Authority's approach to Duty to Cooperate**

The section comes across as a box-ticking exercise. Does the BA have any comments from those it has cooperated with endorsing the 'flavour' given here? Is the BA seen as a valuable and critical member of the local political scene, with a positive and balanced approach to its own three aims, and an empathetic ability to recognise their impact on those of others with whom it cooperates? Does the BA value the opportunity represented by having this duty?

#### **Challenges and Opportunities**

##### **Thoughts on the challenges and opportunities**

These challenges seem a fair assessment of what the local plan needs to address. It is not entirely clear that the plan will do this. Hopefully this will come with the first draft of the local plan.

##### **Thoughts on the special qualities of the Broads**

Boating and boat activity is an essential part of the Broads, and the economy and quality of life in the local area would be very different without it. The list is a reasonable take on what is present in the area, although a little short on the fact that most of it is man-made. The 'navigable, lock free waterways' statement omits the contribution of the North Walsham and Dilham Canal, where the North Walsham and Dilham Canal Trust is aiming and actually working for restoration of the canal.

### **Thoughts on objectives or vision for the Broads Local Plan**

These should reflect the high level ones presented in the Broads Plan 2017, focused on the early years of that strategy needed to address urgent issues and prepare the ground for later work.

### **Thoughts on our existing policies**

No comments

### **Issues and Options- Water**

EU Water Framework Directive is mentioned here, referring to the need to protect, enhance and restore water bodies to 'good' status. Assuming the Broads and some of the water bodies linking them together are in reality heavily modified water bodies, the WFD requires these water bodies to reach 'good potential' not good status. Details of the definitions are:

European Environment Agency website: *'The Water Framework Directive distinguishes between two types of altered water bodies: Heavily Modified Water Body (HMWB) and Artificial Water Body (AWB):*

- *HMWB are bodies of water which as a result of physical alterations by human activity are substantially changed in character and cannot, therefore, meet "good ecological status" (GES). In this context physical alterations mean changes to e.g. the size, slope, discharge, form and shape of river bed of a water body.*
- *AWBs are surface water bodies which have been created in a location where no water body existed before and which have not been created by the direct physical alteration, movement or realignment of an existing water body.'*

### **Run off from boat wash in the new Local Plan**

IWA agrees this needs to be subject of a separate improved policy to address the issue, within the context of a need to maintain a thriving local economy. Practices such as those used in garages to separate oil may be suitable, with modification.

### **How to address water efficiency of residential developments in the Local Plan**

Option 2, proposing 110 l/hd/d for new dwellings, seems an appropriate response to water resources for the future, and the impacts of water usage on the Broads environment.

### **Thoughts on how the local plan should address water usage on non-residential premises**

This seems a good idea, and standards for equivalent industries, premises or processes may be suitable for using as 'good practice' which BA might expect to be achieved. Equally, BA could contact local or national water companies to see whether they have standards which could be applied. Care will be needed to ensure the effect is not to simply accelerate the closure of businesses.

### **How to address sewerage treatment in the Broads**

This title is incorrect, and should be restated to 'How to address sewage treatment in the Broads'. Guidance PPG4 is no longer available on EA's website. However, some more formal policy should better assist domestic properties reduce the pollution from their property. Care will be needed to ensure BA do not over-prescribe solutions which can quickly become out of date or inappropriate,

and prevent innovative solutions being deployed. Realistic, pragmatic outcome- based policy is needed. Reed bed solutions are very effective at providing high standards of treatment for domestic sewage, given sufficient land availability and maintenance of the reed bed.

### **Thoughts on flood risk in the Broads Executive, how the Local Plan should address it and whether there should be a Broads specific exceptions test**

It is hard to see how flood risk on the Broads differs from that elsewhere. However there could be a case for deploying 'local solutions' as a requirement for some types and locations of properties in potentially flooded areas.

Provided the sea defences are not breached as in 1952 the major flood risk to the Broads is at Yarmouth, from a tidal surge. The Local Plan needs to highlight this issue, and see whether consideration of a tidal surge flood barrier is needed, similar to that projected at Boston.

### **SUDS and the Local Plan**

There is a role for exploiting SUDS/ Rural SUDS in areas where there is sufficient space, and where groundwater conditions are suitable- not the case for many parts of the Broads. Equally, combining SUDS type retention systems and reed beds could provide both detention and slow release of run-off water and improvement in its chemical and biological quality before reaching a water body. This could therefore be usefully encouraged in the local plan, provided the SUDS systems have credible ownership, operation and maintenance plans.

### **Open Space, Play and Allotments**

#### **Thoughts on water open space, staithe and slipways**

Recreation is play...the Broads has plenty of potential water recreation capabilities, and BA could more actively deploy/ exploit this. This is also necessary to maximise safety of children in an otherwise more hazardous water environment.

Retention and new provision of staithe and slipways is an important issue, for recreation and commercial transport/ green transport on the water. Plugging the gaps in a programmed and opportunistic way will be vital to feed the pipeline of future water recreational users, as well as maintain the opportunity for 'green transportation' in the Broads area. Once provided, there may be a role for maintenance in local communities and a preparedness to take it on, if they can see the potential benefit.

### **Strategic Green Infrastructure**

Setting out a strategic role for green infrastructure in the Broads is key to demonstrating the benefit of living in and visiting such a location. The Broads should aim for leadership in this area, given its higher dependence on green solutions to current problems. Ideally, the plan would show how deploying green infrastructure would achieve equally effective outcomes for locals and visitors, with better sustainability and lower impact on the Broads environment. An evolving strategy would allow new innovations and pilots to be trialled then rolled out if suitable.

### **Areas suitable to designate as local green space**

At this stage no sites have been identified for designation

### **How should we address climate change in the Local Plan?**

Option 3: Scoping of development type and scale seems the more appropriate response in the local plan. At this stage, Option 5 seems more difficult to specify and implement given the uncertainty around effective solutions and the quantum of need.

### **How should we address peat affected by land use change in the Broads**

If useful and not unduly onerous, provision of guidance in Option 4 seems the better way to address peat exploitation.

### **Heritage and Historic Assets**

The introduction mentions many of the Broads heritage assets but none relating to those around boats and navigation- a significant omission given how many there are, and how they impact the landscape.

### **How do we give further weight to the Local List and undesignated heritage assets**

Option 3 a stronger policy to help manage changes to undesignated assets is needed.

On drainage mills, Option 2 an additional generic policy on reuse of historic and heritage assets will improve the focus on how these can be kept or brought into useful existence, and demonstrate a more flexible response to innovative ideas and good design. This would also avoid the cost and 'big brother' approach of listing which might put people off investing.

### **Broads as an area of exceptional waterlogged heritage**

This proposal by Historic England seems an unhelpful 'blunderbuss' approach to anyone who wants to conduct any development. Simply saying the whole area is involved merely means increased costs will be incurred by everyone, often unnecessarily. A more focused approach is needed, to help identify smaller areas or sites which have a high likelihood of needing investigation or protection.

### **How can the Local Plan address interpretation of the historic environment and culture in the Broads?**

Option 2 using a policy or criteria relating to interpretation seems a low key but useful route to follow.

## **Biodiversity**

### **How can we give undesignated sites recognition?**

Surely a more measured approach should start with why is it necessary to do this, given NPPF statements. If local people don't support going further than current planning, why does the BA think it necessary to tell them that it is? Why not have a process to identify local areas (ie Local Wildlife Sites?) which are nationally or regionally significant, and then support them?

### **How can we protect habitats and species on brownfield sites**

It needs to be born in mind that providing off-site compensation is not always possible for small private developers.

### **How can we compensate for residual adverse biodiversity impacts arising from a development after mitigation measures have been taken?**

Option 2 a compensation policy seems rather like a ransom proposal, and will no doubt be challenged at some point in the courts. The relative powers of the BA and a small developer are disproportionate, and the assessments of adverse impacts too easy to use to swing work the BA cannot afford to undertake onto others who are unable to afford the evidence needed to counter the BA's precautionary principles. More work needs to be done on how residual adverse biodiversity impacts will be measured before a policy can be drawn up, otherwise there is no process to implement the policy. Alternatively BA could find someone else already successfully implementing such a policy, and copy it.

### **Stance on Wind Turbines**

Notwithstanding that current wind turbines are closely related to the windmills and drainage mills of the Broads heritage, they seem now to be out of scale for the landscape, and inappropriate.

### **Landscape Character & its Assessment**

Section 16 Landscape Character, 16.1 Introduction, second paragraph could also include the challenge to control the growth of scrub and trees not only on river banks but also in the reed beds, which are slowly affecting the landscape character.

It is not clear why having an LCA adds anything to the Broads, already itself identified as unique. The only apparent benefit from having guidance on how to interpret them is to judge how a planning application might be impacted, which seems little different to what would be obtained from local planning officers.

### **How should we consider land-raising in the new Local Plan?**

It is not clear from the section whether land raising only applies to physically raising the land surface, or also includes buildings erected on stilts, or indeed perhaps buildings which can float in floods. Once this has been made clearer, Option 3 seems bureaucratic and unlikely to reflect the more positive approach the BA is trying to project. Therefore, Option 2 seems to be preferable. Other options could then include (if not already in) buildings on stilts, or floating buildings to avoid the need for land raising.

### **How should we consider disposing of excavated material in the new Local Plan?**

Option 2 addresses the potential for diverting the material to a more 'green' solution, and identifies the importance of making effective disposal arrangements.

### **Landscaping design in the new Local Plan**

Option 3 provision of a guide offers the potential to truly help developers and reach better solutions. However this will depend on how the guide is written and implemented.

### **How should we address overhead lines in the new Local Plan**

Given the fact of existing Permitted Development Rights, working to implement a protocol seems more sensible. For example, effectively banning improvements in broadband type services will significantly affect business and domestic quality of life in the area, so some compromise is needed.

### **How should we consider settlement fringe in the new Local Plan?**

Option 2 Criteria based policy provides guidance for anyone considering such development.

### **Do we have any thoughts on policy DP 28?**

Given no information is provided on DP28, other than an implication that it might refer to Amenity, we do not have any comments.

### **Are there other areas which IWA considered are tranquil or offer quiet recreation which should be specifically protected?**

No comment

### **How should we address tranquillity?**

Option 3 have a strategic policy, criteria based, which supports the enhancement of tranquillity.

### **How should we address light pollution?**

Via a BA bespoke light pollution guidance- many people do not notice light pollution, or realise there are ways of reducing and avoiding it.

### **How to address retail issues in the Broads Local Plan**

Option 4 Retail impact assessment requirement.

What account is BA going to take of demand- such as hire boaters, outside the area?

How is BA going to provide for retail changes through the plan period such as more home delivery of on-line shopping from outside the area which makes existing retail unsustainable, and how might BA try to encourage outlets such as service providers like pubs and restaurants, linked to tourism/boating?

### **How can the waterways be used more for freight and transport purposes?**

As has already been stated, planning must preserve access to waterways, and could limit 'excessive' road transportation especially for large developments. This will build an awareness of the value and utility of water transport, as well as entrepreneurs prepared to grow a business offering it. The BA could engage with organisations of water transport to ask them to assist. IWA can provide links if needed.

### **How can the Local Plan safeguard future recreation routes?**

Option 2, with a policy which safeguards routes.

### **How to address car parking in the Local Plan**

Option 2, a policy relating to car parks. This should try to stick to principles, not specifics as, for example, electric charging might be some way off, however boat trailers might be an important issue now.

### **What should the Authority's approach be for redundant boatyards or boatyard buildings?**

Option 3: Seek to retain sites in employment use. This should be modified to ensure moorings, slippage and parking facilities for visiting boats and canoes are retained. This will have the advantage that continued provision of services to boaters such as water, visitor moorings etc. will be maintained. These facilities are important to retain, otherwise gaps will appear along the water network.

Any new development on the site must also be so designed to prevent a wind shadow or turbulence impairing the use of the adjacent navigation by traditional yachts and wherries.

For certain marine uses, providing starter units might also work well in retaining some of the character and boat interest in a site.

### **How to address location of new employment land in the Local Plan**

It is better to do encouragement through 'promote starter units' and other ways to provide what is needed, than try to guess where businesses want to go and make them go there. What does BA know about what conditions businesses need to go somewhere? What shortfalls are there currently?

### **Sustainable Tourism**

IWA is keen to ensure the BA manages the balance between the importance of tourism to the local economy, and navigation & conservation. Both the latter are also important in maintaining a dynamic tourism industry, and offering visitors something which represents the reality and diversity of things to see and do which the Broads has. Sustainability is vital for all aspects.

### **How to address sustainable tourism in the Local Plan?**

IWA considers that the best way forward in the plan is with Options 3 & 4, site specific policies for larger tourist attractions and generic ones to help small scale attractions. This will allow the larger sites to use their expertise working within a framework the BA provides, and for local small sites guidance and help from the BA will both simplify their task of putting on a professional attraction with high standards, and ensure there is a commonality running through all Broads attractions.



## **Navigation**

As one of the Broads' three major areas, navigation is also a key element of the ingredients that make the Broads so unique to residents and visitors. Navigation keeps the Broads free of weed and reed, creates jobs, maintains a spectacle and provides a large part of the leisure income the area generates.

Maintenance of the various facilities is essential to keep the attraction functioning and able to provide an experience on a par with its costs to the visitor. In the short term maintenance may well be low-level, however costs of raising bridges and dredging & disposing of material will create one-off and programme cost increases. Likewise changes in technology in the boating industry will lift investment needs for new craft with more equipment, and greener power systems.

The report mentions moorings, with the suggestion that the Broads Authority would like others to become involved. Whilst this may be feasible, it is likely to revolve around a 'premium offering' to ensure some boaters are prepared to pay the extra required to fund such facilities, with such elements as mains power hook-ups, recharging for electric boats, wi-fi and other new technologies as time passes. Some will be prepared to pay for very quiet exclusive locations, others for prime moorings with all facilities to hand. If provision is going to be available, planning will need to start soon and should be in the local plan. Any levies by BA to fund their provision will need to be hypothecated to ensure they do not go to fund work the BA is already funded for, and there will be issues of fair competition to address.

In summary, IWA agrees that the current policy needs an update, as suggested in Option 3. However there are several important issues as well as some 'futurecasting' to do in order to be able to present a comprehensive and thought out local plan within which sites may come forward and investment be found.

On electric charging points and their delivery, IWA would suggest a standard approach, using proven commercial kit to a single common Broads design (if not wider across other navigations in the UK) rather than a new specific BA design. There will be benefit in going to others in the same situation to see how they do it, or discuss with organisations like AINA to canvass their ideas. This will also extend to issues like how to collect payment for such things as moorings and electricity- either simple payment cards or some form of payment deduction system via phones or bank / credit cards. BA may think it worth having a universal system covering car parking and land based charges, as well as mooring and other water based charges.

## **Housing and meeting the objectively assessed needs of the Broads area**

Although the BA has previously deferred to the policies of its surrounding districts, there will be opportunities to provide new housing within the Broads area and these should be sought to make a contribution to the overall need. Given the Broads special situation, there may also be opportunities to provide innovative housing such as floating housing as deployed in Holland to contribute. This would also apply to affordable housing, indeed these may be especially suitable if procured as 'factory built'. However such structures must not interfere with the ability of all craft to navigate the adjacent waterways.

## **How can the Local Plan address Gypsy and Traveller needs?**

As far as IWA is aware, there are not any genuine ethnic water travellers however criteria-based policy should prepare for claims in this area. There are individuals who adopt a travelling water-borne lifestyle, within the legal system of other navigation authorities licencing systems. Enforcement is an essential part of these regimes, to ensure those who adhere to the 'system' are encouraged to do so, and those who do not appreciate the consequences.

### **Areas potentially suitable for residential moorings**

Potentially redundant boatyards which have large spaces of off-line mooring and good land-based services would be suitable for conversion to residential mooring. This may help maintain boater facilities for visitors as well as residents. Given sufficient water space, similar facilities may also allow development of floating houses as they usually have space for car parking, provided such structures do not interfere with the ability of all craft to navigate the adjacent waterways.

It may be worth considering criteria for reuse of boatyards to include, if not prioritise their assessment for residential or floating home use.

### **Floating buildings**

IWA does not have direct experience of floating buildings. However we are prepared to assist BA in developing thoughts around this subject if this is helpful. Floating buildings appear to offer an opportunity to produce factory-built units which can combine good design with a standard product and connection system, and be fitted into the type of environs present within the Broads area. However such structures must not interfere with the ability of all craft to navigate the adjacent waterways.

### **How should the Local Plan address second homes in the Broads?**

Second homes which are not rented out seem to create a double-whammy of little occupation or revenue much of the time, whilst preventing local occupants taking up underused property. As has been seen elsewhere this can quickly degrade an area if second home ownership is relatively intensive. Option 4 A policy approach that relates to locations seems the better way to plan for this eventuality.

### **How to address design in the Broads Local Plan**

Options 2 & 3 both suggest some form of guidance, for differing sizes of development. Both could equally be catered for by standard design briefs for sites, locations or types of sites.

### **How to address energy efficiency in the Local Plan**

Option 2, Fabric first would enable energy efficiency to be well integrated into a development rather than retrofitted. This seems a more appropriate way to design and build an energy efficient and effective development.

### **How can the Local Plan address the issue of residential items and equipment associated with residential moorings?**

These need to be managed through site specific policies. Setting expectations and carefully enforcing them will be essential.

### **How should we consider leisure plots in the new Local Plan?**

Option 2 a more flexible approach should be designed to cater for leisure plots in the local plan.

### **Space standards**

No comment on this issue. It does not seem important compared to other issues, and could be market-led.

### **Sport and Recreational Buildings**

No comment

### **How can we design places for healthy lives?**

Option 2 providing a checklist for design, ideally one which is common across the UK. Work by NHS and others seems likely to produce the basis of such a checklist at some point in the future, and until then there is little to be gained by trying to create one without any evidence.

### **Provision of Schools and education**

Given that others do not see any need for extensions in the Broads area, there seems no need to consider creating opportunities for them in the local plan.

### **How to address waste in the Broads Local Plan**

There seems no real requirement for this, and no policy seems a good position to adopt.

### **How should we consider safety by the water in the new Local Plan?**

It is important to provide reasonable safety systems and support for incidents around the water. This could be an unfamiliar hazard for visitors, and overfamiliar for young residents. Option 2 guidance should, if developed as experience dictates, be a valuable way of indicating what works and what does not, and ensuring that provision is adequate and maintained appropriately.

### **Developer Contributions**

S106 and CIL do have a role to play in building and maintaining a community rather than just a group of houses.

IWA believes these should be used in part to provide and maintain moorings and staithe, including provision of power and similar services. This should also include commuted sums for maintenance, unless the BA considers that these would not be eligible. These would form part of the 'greater good' facilities which normally come with roads, footpaths and similar which in the Broads are in part replaced by water navigations.

### **Site Specific Policies for the local plan**

In general, any site specific plans need to protect adjacent navigation by traditional yachts and wherries by designing buildings and structures so they do not cause wind shadows or turbulence.

#### Protecting the car parking area near Staithe and Willow

Protecting the car park in the same way as that in Site Specific Policy HOR2 seems sensible.

#### How to address Thorpe Island in the Local Plan?

Based on IWA's limited understanding of the various discussions and legal action over this, a revised criteria-based policy seems a good way of learning from the exercise and moving forward, for all concerned.

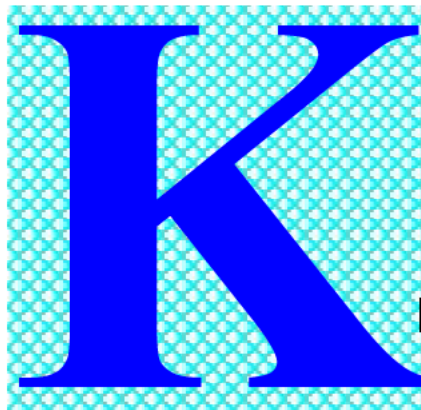
#### Protecting the live/work units at Ferry Corner through the Local Plan and how?

Option 3 mixed use of the development seems a sensible site specific alteration to accommodate the extension of uses of the site.

#### Other sites

IWA does not have any views on these other sites.

The Inland Waterways Association  
Island House  
Moor Road  
Chesham  
HP5 1WA



# King Line Cottages

Luxury Riverside Cottages on the Norfolk Broads

TEL DAYTIME [REDACTED]

<http://www.norfolk-broads.co.uk>

21 March 2016

Natalie Beale  
Planning Policy Officer  
Broads Authority  
Yare House  
62-64 Thorpe Rd  
Norwich  
NR1 1 RY

## Broads Planning consultation 2017

We as a professional Holiday home provider with a number of holiday cottages, are disadvantaged by planners passing plans for new or altered properties, owners or operators being given planning permission with a holiday let proviso. This puts us at a disadvantage, and gives an unfair advantage to them.

I list the reasons below.

At the present time we

Pay full business rates for 2016 £6600 paid out. (This is not the rateable value) on 5 properties.

We also pay VAT on all income @ 20%

We pay our Taxes

We also pay for Visit England star rating

We have a full time member of staff as well as 2 part-timers when required. This keeps a high standard of accommodation for the Broads & employment in the area.

An Individual Property advantage owned by speculative buyer/owner.

If they elect to pay business rates, they do not pay any Rates ( as a small business).

They spend little into the community, as they bring their own provisions.

They do not pay Vat on their earnings

No wages to pay.

Standards are lower due to living away (using contract cleaners).

No personal touch.

No tourist Board accreditation.

Our own observation of these speculative purchase of second holiday home, are a disadvantage to the local community. The first year of purchase they may visit many times, the second year only a few visits, the third year they start to look at ways to rent as a holiday home. This does not help the professional holiday home renters by having amateurs trying to do a professional hire. The local community needs full time occupancy to support the local community.

The Broads have a number of disused boat yards with moorings, these are the perfect locations for holiday accommodation, use these locations.

Individual properties that apply for planning , are more suitable for full time accommodation, not with a ruling, must be used for holiday lets x number of weeks a year.

Please in the next planning consultation give a fair playing field to the small established Holiday providers.

Robert King Esq MBE

DIRECTOR: R KING Esq MBE (MANAGING) REGISTERED IN England No 1022626 VAT No 104 9614 82 REGISTERED OFFICE: Ellis Frost Marine, 4 Pinewood Drive, HORNING, NORWICH

Mr & Mrs P Littlewood

[REDACTED]

[REDACTED]

[REDACTED]

Tel: [REDACTED]

Dear Natalie Beal

Living in Chedgrave we feel very lucky to be able to walk in tranquil unspoilt areas along the river, both in Chedgrave and across the river in Loddon, watching birds, otters, deer and other wildlife. We would therefore continue to support Option 1 in the Housing Section, Chapter 24, Issue 22, as housing development in this area, within the Broads Authority boundary, could only be in and around the boatyards. Even a suggestion that building housing may be possible could lead to loss of habitat and landscape. Sadly an example where we live is the noticeable change of lost wildlife as a landowner cleared his trees and natural habitat before a building contractor submitted a planning application on his land. Application number BA/2015/0123/FUL this application was withdrawn, but the land is continued to be tendered to a degree to look like an empty habitat. The surrounding dykes, marsh and carr continue to be abundant with wildlife because they are left in their natural state.

The adjacent working boat yards are an important area for the continued survival for both Chedgrave and Loddon business, as these facilities bring in important trade and employment to the area. We therefore support Options 1 or 3 in Issue 38, Broads Economy Chapter 21.

We feel that with the vast amount of new housing developments that have already been agreed for the area by South Norfolk Council, there is a real need to maintain our very precious natural environment and the continued respect of our flood plains for our future generations and thriving communities.

Please can you keep us informed of the local plan.

Kind regards

Mr & Mrs Littlewood

**Lottie Carlton**

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**From:** Clarke, Stacey (MMO) [REDACTED]  
**Sent:** 24 February 2016 10:31  
**To:** Lottie Carlton  
**Subject:** RE: Broads Authority Public Consultations: Broads Plan and Broads Local Plan

Dear Lottie,

Thank you for providing the opportunity to respond to the consultation on the Broads local plan.

After Review of the consultation draft it highlighted that there are references to the East Marine Plan and Marine Policy Statement. It is recommended that these references should be maintained within the final plan.

As most of the Broads are at or below sea level there is the potential for them to be highly influenced by marine processes. Therefore, decisions taken in relation to activities and development within the Broads will be capable of affecting the UK marine area and should consider the East Marine Plan. Specific East Marine Plan policies of note given the nature of the Boards and the activities occurring there are BIO1 and BIO2 (biodiversity protection and enhancement potential), CC1 (climate change), FISH 2 (protection of fish spawning and nursery areas), SOC2 (maintaining access to the coast for wellbeing), SOC3 (terrestrial and marine character consideration), TR2 (maintaining recreation boating routes), TR3 (promoting sustainable tourism) and PS2 (maintaining shipping channels).

We advise that East Cambridgeshire provides details of how the East marine plans and policies directly relate to your local plan.

Yours Sincerely

Stacey Clarke

**Stacey Clarke MSc**  
Marine Planning Officer  
Her Majesty's Government – Marine Management Organisation  
District office, Pakefield Road, Lowestoft,  
Suffolk, NR33 0HT

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Enabling sustainable development in our seas

**Lottie Carlton**

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**From:** Andrew Milner [REDACTED]  
**Sent:** 03 April 2016 17:01  
**To:** Planning Policy Mail  
**Subject:** Local Plan Consultation

**Categories:** Ack

Dear Natalie

I completed your on line survey but was disappointed that it did not include a section on the proposed option of having a specific housing allocation. This seems to me to be particularly controversial. i am therefore sending this supplementary email.

I wish to express my support for Option 1, Housing requirement of zero. Issue 22, Housing, Chapter 24.

1. The general housing provision is being met by the relevant District Councils and the BA area is recognised as an area of general restraint to avoid compromising its statutory aims. However, the BA does contribute by “windfall permissions” and by having exceptions policies eg for providing affordable housing for local need and rural businesses.
2. The boundaries of the BA Local Planning Area are tightly drawn to reflect its statutory purposes which restrict the number of potential sites within it.
3. The areas within the boundary are largely within or adjacent to the flood plain further restricting potential sites and the BA needs to exercise caution as there is the danger that global warming will increase risk of flooding in the adjacent areas.
4. The demand outside the current exceptions is largely for expensive, often second homes with riverside moorings with developers/buyers attracted by the unique landscape of the Broad, but which frequently detract from it and tend to exclude less wealthy visitors from facilities – no mooring or footpaths here! The consequent inflated land and property values will also make it very difficult to provide affordable housing quotas or cater for local need within the BA boundary.
5. There is an increasing phenomenon of landowners/developers clearing sites to remove trees and habitat before submitting planning applications. There are 3 local examples in Loddon and Chedgrave and a call for sites will perversely result in habitat loss even if planning permission is subsequently denied. One of the three sites was in the BA area(BA/2015/0123/FUL). Even though the application was subsequently withdrawn further habitat has been removed, including that which the BA's own ecological survey suggested should be retained if any development went ahead.
6. The development of one piece of land usually impacts adjacent areas with edge of development problems constantly spreading outwards as landowners seek to maximise the value of their investment frequently by downgrading habitat either by act or neglect.
7. Residential developments frequently have a negative effect on nearby employment activity. It is easier to make money from development than by successfully running a boatyard or related activity. It is very difficult to disentangle a genuinely “redundant boatyard” from one where the owner wishes to retire or their business model has failed.

Regards  
Andrew Milner

[REDACTED]

## Respondent: Natural England

Date: 01 April 2016  
Our ref: 179178



Maria Conti  
Strategy and Projects Officer  
Broads Authority,

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Customer Services  
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CW1 6GJ

### BY EMAIL ONLY

Dear Mss. Conti and Beal

### Planning consultation: **Broads Plan 2017 – first draft** **Broads Local Plan to 2036 – Issues and Options**

Thank you for consulting Natural England on the above documents in your email dated 16<sup>h</sup> February 2016 which was received the same day.

#### 1) **Broads Plan 2017 – first draft**

##### **Comments on the Broads Plan 2017 first draft**

Natural England welcomes that the visions and aspirations within the Plan appear to be consistent with the environmental objectives within our remit.

For clarity, we advise that a correction is needed on pg. 9 to refer to *Habitats Regulations Assessment* rather than *Appropriate Assessment* as currently written; the Appropriate Assessment (AA) is Stage 2 of the wider four-stage Habitats Regulations Assessment (HRA) process.

We advise that pg. 22 should refer to *Broadland Special Protection Area* rather than *Broads Special Protection Area* as currently stated. For clarity, this site is also listed as Broadland Ramsar site which is designated as Wetlands of International Importance<sup>1</sup> rather than a protected landscape as currently stated.

We welcome that Aspiration 2 aims to protect, maintain and enhance the quality of habitats within the Broads. To further improve this, we advise that reference should be made specifically to the protection and enhancement of biodiversity and geodiversity and distinction made between the

<sup>1</sup> Listed or proposed Wetlands of International Importance under the Ramsar Convention (Ramsar) sites are protected as a matter of Government policy. Paragraph 118 of the National Planning Policy Framework applies the same protection measures as those in place for European sites.



site hierarchy of European (i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites), national (i.e. Sites of Special Scientific Interest (SSSIs)) and local (e.g. Local Wildlife Sites (LWS)) sites. This should then outline that any proposal which would adversely affect a European site, or cause significant harm to a SSSI will not normally be granted permission. It should also set out criteria to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity and geodiversity.

### **Comments on the Broads Plan draft Appropriate Assessment**

Natural England is satisfied that HRA provides a detailed and comprehensive assessment of the likely significant effects of the Plan on European sites and meets the requirements of the Conservation (Habitats & Species) Regulations 2010.

We note that a screening table has been included in Appendix 3 which lists a series of recommended modifications to ensure likely significant effects on European sites are avoided. Natural England agrees with the conclusion of the HRA that, provided the recommended modifications are made in full, the Plan is unlikely to have a significant effect on European sites and hence an Appropriate Assessment (AA) is not required at this time. This conclusion has been made largely on the basis that the proposals within the Plan are high level and do not provide any quantifiable details on location, scale, extent or type of project. As acknowledged in the HRA, we reiterate that it is critical that any subsequent projects (and potentially lower-tier plans) have regard to the recommendations of this Plan HRA and are themselves assessed through the HRA process as necessary.

### **Comments on the Broads Plan draft Sustainability Appraisal (SA)**

We are satisfied that the methodology and baseline information used to inform the appraisal appears to meet the requirements of the Strategic Environmental Assessment (SEA) Directive [2001/42/EC] and associated guidance. The environmental interest within our remit appear to be covered within the SA Objectives.

We note that there is an SA objective to protect and enhance the natural environment including biodiversity and geodiversity (ENV3) and landscape (ENV4). However, as currently written, there is an 'uncertain impact' from Aspiration 4 and 11 on objective ENV3 and from Aspiration 7 and 11 on ENV4. We advise that the inclusion of further wording would appear necessary to ensure any possible conflicts are addressed. For biodiversity and geodiversity (i.e. relating to Aspiration 4 and 11 and objective ENV3) some of these appear to be covered in the amendments recommended in Appendix 3 of the HRA.

## **2) Broads Local Plan to 2036 – Issues and Options**

### **Comments on the Broads Local Plan Issues and Options main document**

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage include:

- **Water quality/resources/flood risk issues**
- **Open space** – For more information see the [Accessible Natural Greenspace Standard \(ANGSt\)](#)

- **Green infrastructure** – we advise that the Plan should ensure the creation, protection, enhancement and management of green infrastructure. For more information, see the [PPG on Green Infrastructure](#).
- **Climate change** – we advise that the Plan should detail the approach to mitigation of and adaptation to climate change
- **Biodiversity** – we advise that the Plan should ensure protection and enhancement of biodiversity **and geodiversity**. Distinction should be made between the protected sites hierarchy of European (i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites), national (i.e. Sites of Special Scientific Interest (SSSIs)) and local (e.g. Local Wildlife Sites (LWS)) sites. The Plan should also make clear that any proposal which would adversely affect a European site, or cause significant harm to a SSSI will not normally be granted permission. Criteria should also be set out to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity and geodiversity.
- **Landscape** (including protected landscapes) – we advise that the Plan should ensure protection and enhancement of landscape (both direct and indirect pressures can impact on character).
- **Tranquillity** – we advise that any areas of tranquillity should be considered, mapped (or otherwise spatially identified) and provided appropriate policy protection within the Plan.
- **Light pollution** – light pollution has negative impacts on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates). Policies (usually design policies) should address impacts on the natural environment.
- **Transport** – we advise that full account should be taken of any impacts from transport (and associated infrastructure) on the natural environment

We advise that the following issues are also scoped in:

- **Soils** (including protection of BMV land) – the issues of peat and mineral resources have been identified but we advise that soils in the wider sense should also be scoped in. Soil is a finite resource and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably. The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity. We advise that the Plan policies refer to the [Defra Code of practice for the sustainable use of soils on construction sites](#). Reference should also be made to Best and Most Versatile (BMV) agricultural land. BMV land is defined as Grades 1, 2 and 3a in the Agricultural Land Classification (ALC) system. The plan should recognise that development (soil sealing) has an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land.
- **Priority habitats and species** – whilst biodiversity in general has been scoped in, we

advise that the Plan should specifically promote protection and recovery of priority habitats and species. For more information, [Habitats and species of principal importance in England](#) lists priority species and habitats (i.e. those material to planning).

- **Ecological networks** – we advise that the Plan should ensure that ecological networks are enhanced
- **Ancient woodland** – we advise that the Plan should ensure that ancient woodland is protected. For more information see [Ancient woodland and veteran trees: protecting them from development](#)
- **Air quality** – we advise that, in particular, any potential traffic impacts of new development including agricultural (e.g. intensive pig and poultry) on European sites and SSSIs may pose a risk to air quality.

Natural England welcomes that a commitment is made to carry out HRAs on subsequent versions of the Plan (pg. 5). We advise that this is crucial to ensure the Plan will not adversely affect the integrity of European designated sites and look forward to being consulted on these in due course.

### **Comments on the Broads Local Plan interim Sustainability Appraisal**

Natural England are satisfied that the methodology and baseline information used to inform the appraisal appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance. We welcome that there is an objective to protect and enhance the natural environment, including biodiversity, geodiversity and landscape. We have no further comments to make at this stage but look forward to advising further on the SA as the plan evolves.

### **Comments on the Broads Local Plan form: Summary questionnaire, Call for Areas of Tranquillity, Call for Areas Suitable for Residential Moorings and Call for Areas of Local Green Space**

We have no comments to make on these documents.

This concludes Natural England's advice which I hope you will find helpful.

For clarification of any points in this letter, please contact Jack Haynes using the contact details given below. For any new consultations or issues, please contact [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

**Jack Haynes**

Land Use Operations Norfolk & Suffolk Team

Email: [REDACTED]

Tel: [REDACTED]

Respondent: Norfolk and Suffolk Boating Association



## NORFOLK & SUFFOLK BOATING ASSOCIATION

President: R I Card      Chairman: B E Wilkins  
[www.thegreenbook.org.uk](http://www.thegreenbook.org.uk)

7 April 2016

Ms N Beal  
Planning Officer  
Broads Authority  
Yare House  
62-64 Thorpe Road  
NORWICH  
NR1 1RY

Dear Ms Beal

### **Broads Local Plan 2012 to 2036, Issues and Options consultation, March 2016**

The NSBA is grateful for an opportunity to comment on the **Issues and Options** consultation on the Broads Local Plan.

**The Section 3, 'Spatial Portrait'**, which gives in most other regards a snapshot of what is special and even unique about the Broads is, surprisingly, silent on what is arguably the most valuable consideration - the boats, and the people who maintain and sail them. May we suggest adding:

'Visitors to the broads, taking to the network of rivers and broads in the summer months, are routinely delighted, thrilled even, to find themselves sharing the water space with Yare and Bure One Designs ('White Boats'), Broads One Designs ('Brown boats'), period launches and day boats some propelled by steam, the Broads River cruisers, (a type of yacht complying with local rules making them unique to the Broads), 'Norfolks' (varnished wooden dinghies), the racing derivatives of the traditional Norfolk punt, dozens of types of nationally and internationally recognised racing/sailing dinghy, and last but not least albeit in much smaller numbers, the restored and maintained traditional trading wherries and leisure wherries. Many of the craft in this list are of wooden construction, a proportion are pre-war or even over 100 years old, and all require significant investment of skilled maintenance and periodic restoration by their owners and local specialist boatyards. This rich variety of boating heritage is probably unrivalled anywhere in the world. An indication of the commitment of local people to heritage boats and boating on the Broads is that there are over 50 voluntarily run clubs and classes affiliated to the Norfolk and Suffolk Boating Association. Additionally, local clubs produce national and international champions from time to time, whose fame and notoriety filters back to the 'grass roots' to enthuse and encourage younger members'.

## **Section 6, Challenges and opportunities**

We suggest amending, under **Strengths, page 22**, ‘Substantial engaged community of private boat owners’ to ‘Substantial engaged community of private boat owners, many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), and including children, to acquire and hone the skills required to become good sailors’.

We suggest adding, under **Opportunities, page 23**, ‘Opportunities to encourage both local residents and visitors to join one of the many boating clubs, take part in organised events, go on formal sailing courses and gain recognised Royal Yachting Association (RYA) qualifications.

## **Section 9 Open Space (land and water), Play and allotments, at 9.4, page 41 ‘Water Open space’**

Whilst we commend the reference to staithes and the rights and entitlements enjoyed variously by the public and parishioners, there is inadequate weight on restoring staithes at key sites (such as Ludham Bridge) back to their legally protected status. Staithes have traditionally been used for mast raising and lowering at bridges as well as for loading and unloading. Deficiencies of moorings to meet the needs of various water-space users is one of the biggest challenges faced by The Broads

**Launching facilities.** We support the improved provision of accessible slipways and canoe launching facilities, and in addition would urge the Authority, when constructing or improving access facilities, to ensure that local users are consulted in detail about their requirements and preferences for the details of materials and layout.

## **Section 10, Green Infrastructure, and Section 22, Sustainable Tourism**

We failed to find any reference in either of these sections, to the most sustainable form of transport and the most sustainable form of tourism, that is, transport by engineless boat propelled by the harnessing of wind and tide.

## **Section 23, Navigation, page 109**

We note and agree with your list of 6 threats to navigation: ‘Sediment management, bank erosion, riverside scrub and tree management, aquatic plant maintenance, navigation safety and bridges. We also note your remark that planning is not directly linked to all of these threats, but would suggest that policies are appropriate to inform development control in the event of any proposals, such as the Broadland Flood Alleviation project, which would have an impact on any of these threats.

One additional point we would raise is the need for planning control of bright waterside lighting (the examples on Horning Racing Reach and at Great Yarmouth are typical). The lights interfere with helms’ night vision and have an impact on safety. They also provoke retaliation in the form of the use of searchlights on boats, which should be discouraged on the Broads.

**Regarding Issue 41, Page 110, ‘Mooring provision as a result of related development’,** we would recommend Option 3: ‘Improve the existing Policy’.

Regarding **wild and informal moorings**, Page 111. We concur with your remarks about not formalising these through the local plan process.

Regarding the provision of **electric charging points**, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case. As such, landscape issues are not primary considerations at busy 24 hour mooring sites. However, we would expect this provision to cross refer to both the **Green Infrastructure** and **Sustainable Tourism** sections.

In conclusion, we trust the above comments will be taken into account and added to the emerging local plan. May we be forgiven for where we haven't responded specifically to your 'thumbnail question.' Can we be confident that our views will not be ignored because we haven't followed your form 'to the letter'? We trust these independently expressed views represent fresh thinking, to the benefit of the plan and the Broads, and we hope the 'do nothing' option will be avoided in the majority of cases.

Yours sincerely

A solid black rectangular box used to redact the signature of Brian Wilkins.

Brian Wilkins  
Chairman





**NORFOLK**  
CONSTABULARY  
*Our Priority is You*

FAO

Maria CONTI  
Natalie BEAL  
Broads Authority  
Yare House  
62-64 Thorpe Road  
Norwich  
Norfolk  
NR1 1RY

Norfolk Constabulary

Operational Partnership Team  
Police station  
Howard St North  
GT Yarmouth  
NR30 1PH

[www.norfolk.police.uk](http://www.norfolk.police.uk)  
Non-Emergency Tel: 101

Ref:

**Broads Plan 2017**  
**Broads Local Plan to 2036**

Date: 08/04/16

### **Public Consultation Broads Plan 2017 & Broads Local Plan to 2036**

Expertise in crime prevention processes, products and criminal methodology helps the police fight crime, protect properties, businesses and visitors from unnecessary loss. We recommend the Broads Plan includes the security principles of deterring, delaying, denying and detecting criminal activity. Designing in good security processes with developers and builders at the outset is essential to combat criminality and its consequences.

As a result of considering the strategic priorities and spatial planning policies for the management of the Broads please consider the following comments in parallel to ongoing proactive policing activity/initiatives across the Broads area:

- The adoption of CPTED<sup>1</sup> principles in building design and development across the Broads National Park. This would help protect new dwellings, existing buildings, commercial developments from loss
- With a significant number of architectural and historical sites in the Broads National Park, CPTED will also help safeguard cultural heritage, which remains high on the list for protection

<sup>1</sup> Crime Prevention Through Environmental Design





- Access to the countryside and local amenity areas must be balanced by the potential for the criminal to use the same highways & byways to commit crime and escape detection. Unnecessary pedestrian and vehicular permeability should be reconsidered or removed
- Communal areas (*including public open spaces*) & leisure facilities should be assessed to prevent the occurrence of anti-social behaviour
- Secure boundary treatments should be considered proportionate to criminal statistics and not solely aesthetic considerations
- Suitable security lighting provides safety for occupiers and visitors, reduces the fear of crime<sup>2</sup> and is a significant deterrent for the criminal, who seeks to avoid being seen
- Ongoing vigilance, effective natural surveillance and speedy reporting of emergency, urgent or suspicious activity will benefit all who live, work and visit the Broads National Park

The promotion of CPTED principles and practices will be a significant step towards protecting the wonder and heritage of the Broads National Park, for future generations to use and enjoy.

Yours sincerely

Mr Dick Wolsey  
**Architectural Liaison Officer**  
 Covering:  
 GT Yarmouth Policing District  
 South Norfolk Policing District  
[www.securedbydesign.co.uk](http://www.securedbydesign.co.uk)

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<sup>2</sup> Secured by Design, New Homes 2014

**Norfolk County Council Comments on:**

**Broads Authority Local Plan – Issues and Options Consultation Document (February 2016) -**

**March 2016**

**1. Preface**

- 1.1. The officer-level comments are made on a without prejudice basis and the County Council reserves the right to make further comments on the emerging Local Plan.
- 1.2. The schedule provides a series of strategic comments on the emerging Local Plan. More detailed Green Infrastructure comments are set out in Appendix 1 (officer-level advisory comments).

**2. Introductory Comments**

- 2.1. The County Council welcomes the opportunity to comment on the above Local Plan Issues and Options document. The County Council has not answered all the issues set out in the consultation document, but has instead concentrated on responding to the key strategic issues effecting the Authority in respect of its:
  - Infrastructure delivery role
  - Minerals and Waste Authority responsibility - ensuring that County Council policies and projects are not compromised;
  - Economic Development role
  - Delivery of Green Infrastructure.

**3. Developer Contributions (Chapter 33)**

- 3.1 The County Council welcomes the inclusion of the references to developer contributions from new development and the different mechanisms which will be used to secure funding. Public Health welcomes the inclusion of provision for health infrastructure under the priorities for developer contributions and would advise consultation with healthcare commissioners (Clinical Commissioning Groups and NHS England) in this regard.
- 3.2 Should you have any queries with the above comments please call or email Laura Waters (Infrastructure and Economic Growth Planner) on [REDACTED]  
[REDACTED]

**4. Minerals and Waste**

- 4.1 Norfolk County Council in its capacity as the Mineral Planning Authority welcomes the inclusion of the references to mineral planning and mineral safeguarding within the Issues and Options document. In particular the reference that Norfolk County Council is the county planning authority for the Norfolk part of the Broads and that the Council's responsibilities include minerals and waste planning, is welcomed.

The Mineral Planning Authority will be conducting a review of the Local Development Scheme later in 2016, which will include revised dates for the review of the Minerals and Waste Local Plan.

Norfolk County Council in its capacity as the Mineral Planning Authority considers that in terms of mineral planning the Issues and Options document correctly address these issues in the context of the Broads Authority Executive Area.

- 4.2 Should you have any queries with the above comments please call or email Caroline Jeffery (Principal Planner, Minerals and Waste) on [REDACTED]  
[REDACTED]

■ [REDACTED] 21)

5.1. **Response to Issue 38 –**

- 5.2. It is felt that either no change to the existing policy or having a less restrictive policy would be the preferred options in relation to redundant boat yards or buildings from an economic development perspective.

5.3. **Response to Issue 39 -**

It is felt that reintroducing the approach from the 1997 local plan with development boundaries relating to employment development would be the preferred option from an economic development perspective.

- 5.4. Should you have any queries with the above comments please call or email Stephen Scowen (Economic Development Partnership Officer) on [REDACTED]  
[REDACTED]

6. **Sustainable Tourism (Section 22)**

6.1. **Response to Issue 40 –**

It is felt that no new policy is needed for sustainable tourism and existing policies would cover what is required from an economic development perspective.

- 6.2. Should you have any queries with the above comments please call or email Stephen Scowen (Economic Development Partnership Officer) on [REDACTED]  
[REDACTED]

7. **Public Health**

- 7.1 **Response to question 2 –** Public Health would like to see reference to the Broads as a health promoting environment in this section.

## 8. **Health and Wellbeing (Section 27)**

- 8.1 Public Health welcomes the consideration to the health status and well-being of the residents of the Broads Authority area and the inclusion of information on the wider determinants of health, such as the index of multiple deprivation in the opening statements. Public Health also welcome the inclusion of well-being within the three key themes and the attention to health and wellbeing in section 27.

In section 7 it is felt that there is an opportunity to promote the health and well-being benefits of the Broads and the connection to the natural environment, as evidenced by Newton (2007) Wellbeing and the Natural Environment, and by the RSPB report 'Natural Thinking (Bird 2007).

- 8.2 **Response to Issue 33** – Public Health strongly support option two: designing places for healthy lives checklist. Norfolk County Council Public Health in collaboration with planning colleagues are continuing work on the shared engagement protocol and checklist for designing places for healthy lives. The commitment under 23.8, health assessment of the local plan, reflects this draft protocol.

Reference is made under 23.7 to the Norfolk 'HUDU' model. The draft shared engagement protocol includes a Norfolk model for estimating health infrastructure need.

## 9 **Open space (land and water), play and allotments (Section 9)**

- 9.1 Public Health welcome the acknowledgements given to the value of open spaces, play etc. to public health and the consideration given to approaches to address land-based open space, allotments and play requirements in the Broads.

- 9.2 Should you have any queries with the above comments please call or email Martin Seymour (Specialty Registrar in Public Health) on [REDACTED] or [REDACTED]

## 10 **Green Infrastructure**

- 10.1 The green infrastructure team strongly support the need for a policy-based approach to the delivery of strategic GI and have provided more detailed comments as set out in appendix 1.

- 10.2 Should you have any queries with the above comments please call or email David White (Senior Green Infrastructure Officer) on [REDACTED] or [REDACTED]

## Broads Authority Local Plan - Issues and Options consultation

Formal comments from the Environment Team for NCC Corporate Response (Co-ordinated by David White)

### Green Infrastructure (Section 10)

#### Issue 5: Delivery of Green Infrastructure (GI)

- We strongly support the need for a policy-based approach to the delivery of strategic GI.
- Both Option 2, a Strategic GI Policy, and Option 3, Specific GI policies for specific locations/projects, would appear to be suitable delivery mechanisms.
- Areas for consideration could include:
  - Requiring development to contribute to the Public Rights of Way (PRoW) network by providing links to - or enhancements to – the existing PRoW, Norfolk Trails (three are within the Broads Authority area) and strategic cycle routes (existing or planned e.g. The Three Rivers Way, The Broadland Way) (see NPPF para 75).
  - Requiring development to take measures to minimise impacts from recreational on the internationally designated biodiversity sites (the Natura 2000 network) in compliance with the Conservation of Habitats and Species Regulations 2012.
  - Requiring development to contribute to ecological networks and connectivity (NPPF para 117), both within the Broad Authority area and to the wider network of Norfolk
- Issues relating to Open Space and allotments (**Issue 9**) could be covered by a strategic GI policy as they are included in the GI definition used in the Issues and Options report.
- **We would support either option 2 or 3 of Issue 5.**

### Biodiversity (Section 14)

#### Issue 11: Recognition of non-designated wildlife sites

- We support the concept of adding what effectively will be a fourth tier of biodiversity sites (international, national, local sites (i.e. CWS) and the proposed non-designated sites).
- Paragraph 14.3 indicates the potential of such sites to contribute to 'habitat corridors'. The NPPF (para. 117) requires LPAs to "identify and map local ecological networks (and) wildlife corridors" and the proposed non-designated wildlife sites could contribute to this aim.
- Therefore we would **strongly support Option 2 of Issue 11.**

We note that the Issues and Options document refers to the production of Biodiversity Enhancement Guidance (para. 14.1). We support this idea but consider that the small scale enhancements mentioned in para. 14.2 could be more ambitious.

#### Issue 12: Protecting habitats and species on Brownfield Sites

- There are clearly opportunities likely to arise for development to occur on brownfield sites within the lifespan of the emerging plan. This may reduce pressure on other sites within the LPA boundary, the brownfield sites can have significant biodiversity value in themselves.
- **We would support Option 2 of Issue 12** that focusses on a criteria-based policy to protecting species and habitats on Brownfield sites.

### Issue 13: Compensation for residual adverse impacts on biodiversity

- The NPPF states that the 'mitigation hierarchy' (avoidance, mitigation, compensation) should be followed, and if adverse impacts on biodiversity cannot be mitigated or compensated, then planning permission should be refused. It follows that if there are residual impacts i.e. ones that cannot be compensated for on-site, off-site compensation can be considered. This approach is increasingly used in Norfolk.
- The principle of off-site compensation is already permitted by the NPPF and so Issue 13 is really only asking if greater specificity is required to deliver this approach to dealing with residual impacts.
- We are of the opinion that matters of this nature should be considered on a case-by-case basis. The compensation policy of Option 2 seems unwieldy and may prove difficult to deliver. Mechanisms for delivering off-site compensation already exist in Norfolk (e.g. the Connecting Nature Fund administered by FWAG/NCC and included in the consultation draft of the emerging Broads Plan).
- **Our view of Issue 13 is that as off-site compensation is already permitted by the NPPF, no specific policy is necessary (Option 1).**

We note that the recreation impact study mentioned in Para.14.3 only addresses issues at International sites (Natura 2000 sites).

### **Landscape Character (Section 16)**

Question: Do you have any thoughts how the LCA could be interpreted to aid the planning application process?

- There are opportunities to produce guidance derived from the Landscape Character Assessment which is more accessible to the public and potential applicants; guidance could briefly outline the key landscape features within each character type and, where appropriate, provide guidance on details such as typical planting type or form for each area.

### Issue 14 – Land Raising

- Option 2 would make allowance for flexibility over time, providing an adaptive approach which could respond to climate change and any other advances in knowledge or technology.
- Although land-raising can result in visual impact, it is a process which has occurred historically in the Broads and in some areas, contributes to overall landscape character. The NPPF (Para. 61) requires planning policies to "...address the connections between people and places and the integration of new development into the natural, built and historic environment".
- **We would support Option 2 of Issue 14 as it is not restrictive, allows the significance of different landscape features to be assessed and can be flexible into the future.**

### Issue 15 – Disposing of excavated material

- This section links with land-raising under Issue 14.
- The requirement of detailed information concerned with excavated material will help to inform other aspects of any given proposed development and may give rise to opportunities for landscape character and habitat enhancements, contributing to a more holistic approach.



- **We would support option 2 of Issue 15** that seeks to formalise and better regulate the disposal of excavated material.

#### Issue 16 – Landscaping Design

- We believe that Option 2 would clarify the difference between landscape character and landscaping, and could be underpinned by guidance for applicants.
- **We would support option 2 of Issue 16** which could be accompanied by supplementary guidance as discussed under the Section 16 Landscape question.

#### Issue 17 – Overhead Lines

- Overhead lines can be seen as a detractor on the Broads landscape. With regard to landscape, a positive move toward reducing and preventing further implementation of overhead lines, particularly in the more sensitive areas of the Broads, would be favourable.
- It is noted that some development is covered by permitted development rights, and so a policy would not necessarily safeguard all areas. With this in mind, **we would support Options 2 or 3.**

#### Issue 18 – Settlement Fringe

- Option 3 would identify the most sensitive settlement fringes, however there would be a need to take different types of development into consideration due to the varying degrees potential landscape impact.
- Should other landscape guidance be produced, as discussed elsewhere, the need for location specific design criteria may then not be required to such an extent as proposed under Option 3.
- Option 2 would see schemes assessed on a case by case bases, and could result in a similar development outcome as if Option 3 were in place. With informative from other landscape guidance Option 2 may provide a comprehensive enough approach, as particularly sensitive landscapes and settlement fringes could be outlined elsewhere.
- **We would favour Option 2 in a situation where it could sit alongside landscape guidance** as discussed under Section 16 Landscape Question.

### **Amenity and Tranquillity (Section 17)**

#### Issue 19 - Addressing the issue of tranquillity

- There is an inherent tension in that the quieter areas of the Broads tend to be used by priority species of wildlife (e.g. used for nesting by Marsh Harriers). Encouraging the use of these areas for recreation - even quiet recreation - may be detrimental to the biodiversity and, in the case of 'designated features' of the Natura 2000 sites, may contravene the Habitat Regulations 2012.
- The impacts from any proposal of this nature will need to be assessed under the Habitat Regulation Assessment.

### **Light Pollution (Section 18)**

#### Issue 20 – Light Pollution

- There are synergies between Options 2 and 3 of Issue 20.

- NPPF (Para.125) states that planning policies should “...limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.” Consideration of impacts from lighting on biodiversity, particularly on bats is necessary.
- **We would support Options 2 and 3 coming forward together.**

## **Design (Section 25)**

### Issues 27 – Design

- Design needs to be considered at all scales of development, the options provided are not necessarily comparable.
- DP4 takes the matters concerned within Options 2 and 3 into account but in the instance of larger development, does not prescribe any specific requirements, such as a design code, or promote mixed use development (NPPF, Para. 38).
- **Our view is that the content noted in Options 2 and 3 require further exploration and could be taken forward into an updated DP4 Policy.**

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## Residential Boat Owners' Association

Boats  
are our  
Homes

website : [rboa.org.uk](http://rboa.org.uk)

### RBOA Response to Broads Authority Local Plan Consultation

#### NOTES :

The RBOA's remit is exclusively for residential boat owners, and the Committee feels that it would only be appropriate to address those areas of the Local Plan Consultation that have direct relevance to such home owners.

To that end all the comments are addressed under the references in the whole Local Plan as found on the Broads Authority website.

#### 6. Challenges and Opportunities

##### High reliance on tourism

Residential boats help to balance this by providing both a presence and support for the local economy throughout the year.

##### Lack of affordable housing

Residential boats can provide affordable housing in an area where there is both a lack of actual property, restrictions on development, and where housing prices are high due to lack of supply.

**Encouraging sustainability** through the innovative design of buildings could well apply to the innovative design of residential boats, particularly for specific locations on the Broads.

**Changes in patterns of recreation** including impacts of decline in hire boat fleets provide another opportunity by combining some residential moorings with leisure and hire boats to keep boat yards sustainable and increase their future viability.

**High house prices** (as above for residential boats,) could provide starter accommodation for young people, encouraging them to stay in the area and move on to housing when this becomes more affordable.

#### 7.3 Existing Policies

##### Policy TSA2 Thorpe Island

As this is being retained the RBOA would support any future planning applications which assist the sustainability of the existing boatyard - see Changes in patterns of recreation above, and any such PAs should be positively considered on their own merits in that context.

#### 8.4

We support the use of filtration systems to reduce the contamination from washing down of vessels. We encourage the development and use of less toxic anti-fouling paints but note that the leisure boating industry needs further investment to ensure that this is taken up. In this context it should be noted that ecological sustainability can be furthered very effectively by a reduction in the need for mains supplies.

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# **Residential Boat Owners' Association**

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website : [rboa.org.uk](http://rboa.org.uk)

## **19. Retail**

RBOA policy identifies residential moorings in appropriate locations as supporting the local retail centres, particularly out-of-centre developments away from the main tourist areas and outside the main tourist seasons.

## **21 The Broads Economy**

### **Boatyard Industry**

The RBOA supports the increase in the diversity and robustness of this sector, which would very effectively support the viability of adjoining communities.

Appropriate residential moorings can support the viability of boatyards by maintaining regular income streams, regular need for boatyard facilities, maintenance, fuel etc and by providing affordable accommodation for boatyard operatives.

Whilst understanding that some boatyard operations do not need to be carried out adjacent to the water, it is important to conserve this traditional connection.

## **23 Navigation**

### **Mooring Design Guidance**

The RBOA is very supportive of good design and appropriate location of moorings and is prepared to assist with this from its experience elsewhere on issues such as safety, security, surface material, sustainability, ecological viability and protection.

It is noted that the BAS is producing an Updated Mooring Strategy and will consider this in full. It would be good to see moorings fully integrated between visitor, permanent leisure and residential as we believe that the latter can add security and other benefits.

Servicing of moorings is an important issue for all users and whilst supporting the provision of charging points it would be very useful to explore the option of residential moorings using renewable energy sources.

## **24 Housing**

The RBOA is involved at national level in promoting the contribution that residential boats can make to the supply of housing which does provide an alternative, diverse and affordable solution in appropriate locations.

Government is recognising this in its current Periodic Review of Housing Needs by noting it under special housing needs. [We are under discussion about the confusing term “barges”.]

### **20.6 Residential Moorings**

The RBOA support the extension to the areas likely to permit residential moorings.

It is understood the general requirement is to relate these to existing settlements with good facilities, and agree that there may be options outside existing development boundaries.

Presently, we are working with our local members to identify suitable sites which comply with the criteria DP25.

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## **20.7 Floating Buildings**

The RBOA support the concept of floating housing (defined differently to residential boats) as a viable way to meet the need to build within flood risk areas and would be interested in discussing this further with the Broads Authority. We believe that the Broads would be an ideal environment to progress good design of floating buildings appropriate to their location.

We understand the uncertainty of the definitions boat/ houseboat/ floating home and would be interested to pursuing this further for mutual benefit.

## **21.4 Energy Efficiency**

**Issue 29**, residential items and equipment associated with residential moorings

The RBOA is well aware of the detrimental impact that such paraphernalia can have on the visual impact of residential moorings and hence on their acceptance by the local community. We believe that this can be resolved by satisfactory design of appropriate storage facilities linked to active management of the site. We are happy to discuss examples of good practice from elsewhere. We agree that this should reflect any special qualities of any area.

We trust that the RBOA response proves helpful, and that we may be of further assistance in relevant elements in the future.

Mike Pritchard

**Chair**

**Residential Boat Owners' Association**



## **Broads Local Plan Issues and Options**

### **Summary leaflet and questionnaire**

Consultation from 15 February to 4pm on 8 April

#### **Introduction**

The Broads Authority is working on a new Local Plan, which is one of our duties as a local planning authority.

Local Plans contain policies to help shape the future development of an area and are used when making decisions on planning applications. The policies cover many topics such as renewable energy, affordable housing, moorings, flooding and impacts of development on people or the landscape.

This is the first stage in the preparation of a Local Plan where we highlight issues and suggest potential options to address them. We are consulting on these issues and options from 15 February 2016 to 4pm on 8 April 2016.

This leaflet and questionnaire is a summary and does not contain everything that is in the main document. Therefore if you would like full details please read the main document (<http://www.broads-authority.gov.uk/broadsconsultations>).

A list of venues where you can access hard copies of the Issues and Options is listed below:

- At the following libraries: Acle, Beccles, Brundall, Bungay, Cromer, Great Yarmouth, Loddon, Lowestoft, Oulton Broad, Norwich Millennium, Stalham and Wroxham.
- At these Council Offices: Broads Authority, Broadland, Great Yarmouth, North Norfolk, Norwich City, South Norfolk, Waveney, Norfolk County and Suffolk County.
- At these Tourist Information Centres: Whitlingham, Toad Hole Cottage at How Hill and Hoveton.

We will also be holding open days where you can come and talk to officers about the Local Plan.

- Saturday 5 March, 1:30pm to 3:30pm at Stalham Town Hall
- Saturday 19 March, 10am to 12pm at Oulton Community Centre
- Wednesday 23 March, 6:30pm to 8:30pm at Brundall Memorial Hall

**We really hope you take this opportunity to tell us what you think.**

Please note that:

- We take into account all comments and answers so cannot guarantee that individual answers or thoughts will always change the local plan.
- We will consider the comments we receive to the consultation and give our response to what you say.
- When you provide your contact details, we will keep them and only use them in line with data protection rules
- Your response will be made public, with your name and organisation (if relevant) but not any other details. This enables a transparent process.
- Please be respectful with the content of your responses because they will be made public.



### **Q1: Special qualities of the Broads**

We want to protect and enhance what makes the Broads special. We want to know what is special to you about the Broads, and what you do not like, and why.

#### **What do you like about the Broads?**

The River and Broads as an amenity, for water transport and pleasure, also we like the wide and varied visual amenity of changing sky and countryside views. We enjoy the variety of the local vernacular architecture and diversity of the boats travelling through the waterways. Our members enjoy staying and living by the rivers, using the riverside properties for relaxation, family time and the pleasure of being beside the water. We enjoy the variety of wildlife that can be seen in the area.

#### **What do you not like about the Broads?**

We do not enjoy speeding boats, noisy visitors, litter, untidy, unkempt, riverside sites such as The Bridge inn site which has been derelict for many years. In Potter Heigham itself we have an abandoned, semi derelict public house(the Broads Haven Tavern)adjacent to a scheduled ancient monument, the Medieval Bridge, and an enhanced public access amenity space (Bridge Green). We do not like the difficulty in finding suitable parking for ourselves and visitors. We do not like the condition of Bastwick Staithe and the fact that it is a muddy, potholed car park, again next to the Medieval Bridge. This gets used as permanent parking, where as it should be an open Public Staithe. Since the removal of refuse compounds and suitable places for boat hirers to deposit their inevitable rubbish, there has been a great litter problem with overflowing bins and black plastic bags deposited on both Bastwick Staithe, Potter Heigham Staithe and in the private Car Park on the Bridge Inn site. The footpaths behind the bungalows on the Hickling Bank, and the Martham bank have deteriorated and are in need of maintenance. The footpath from Martham Boatyard to Potter Heigham is completely impassable, with foliage, water, slime and vegetation covering it. Walkers have to walk on the Flood defences, behind the flood wall. We do not like intrusive and unnecessary signage on the Broads, especially advertising signage.

#### **What would you like to stay the same about the Broads?**

Retention and upkeep of bungalows along the Thurne should remain .We would like public access to the Broads area to continue, the fact that people can walk, boat, cycle in the area should be encouraged. Visitors to the area must have places to stay and things to do. Therefore we would like amenities such as Public Houses, restaurants, boat hire companies, shops, hire bungalows, flats, hotels, camping and caravan sites to be encouraged. Wildlife and the varied scenery should remain, also the access to the wilder areas of the Broads system should be maintained, either by foot or by water. The biodiversity of the area is paramount, such as river and walking access to Hickling and Horsey. Areas of trees and shrubs should be encouraged as the variation of scenery is necessary to wildlife. Retention of toilet facilities is essential. Mooring spaces either on the main river, broad or in a boatyard should be retained. Quiet areas for moorings should be retained for those boating people who would like the peace and tranquillity of this unique area.

#### **What changes would you like to see in the Broads?**

In the Potter Heigham area we would like to see tasteful and sympathetic renovation of derelict sites, whilst retaining the character and tradition of the area. We would like to see improved parking in the Bridge area, especially for bungalow hirers, walkers, fishermen, day trippers and visitors. Litter bins, and places for boat refuse are essential. An evening eating establishment is essential in this area to allow boat users, walkers, etc to stop and relax in pleasant surroundings. There is no such establishment in Potter Heigham where we might have upwards of 40 cruisers moored along the river and in the boatyard, and the occupants of up to 50 bungalows who might need an evening meal.

### **Q2: Floating buildings**

Some people like to live or work on the water, but floating buildings can be a complex area. We need to think about the visual impact, ensure that people and their belongings are safe in times of flood as well as consider the location of floating buildings.

**What do you think about floating buildings in general?**

- Like them? NO
- Dislike them?



**Do you have any comments?**

Some Broads folk have always lived in floating buildings.. if by that you mean eel boats, painting studios, floating holiday bungalows/houseboats such as those at Martham, Wayford Bridge , Hickling, Stalham. These are traditionally used as holiday accommodation and provided they are sited sympathetically in the Broads landscape they serve a purpose and could be retained. Caravans or something similar NOT designed for the purpose of floating are unpleasant, intrusive and generally not liked by our members. However if something such as the purpose- built floating Dutch and Scandinavian buildings, in areas susceptible to flooding or on lakes can be pleasant, beautiful and quite desirable, even in the Broads landscape. It all depends on the design and location of the 'floating buildings'

**Q3: Second homes**

These are properties used by an individual or family in addition to their main home elsewhere.

By not being occupied all year round, services in the area could suffer because they are not used and this can affect viability, but when they are occupied there could be benefits to the local economy and tourism businesses.

**How do you think second homes affect your community?**

**On the River Thurne there are 200 holiday homes, the majority of these are second homes, and not let commercially. These second homes have led to an area of social diversity, with some families having owned their properties through 3 generations, and by using their bungalows they take part in the local community, use the local facilities and help the home economy, boatyards, businesses, restaurants, etc. Indeed some of these businesses might not be viable without these bungalow owners. The Broads benefits from this in the number of tolls paid by the bungalow owners most of whom have at least one craft on the water.**

**If we could somehow restrict second homes in your area, is that something you would support? Why?**

- Support? ☐
- Against? No ☐

**Do you have any comments?**

We, as bungalow owners value and indeed love our waterside properties and would not like to see them restricted in any way. These properties are not part of the local housing stock and even if these wooden bungalows use were restricted then how else could they be used?

**Q4: Building your own home.**

The Government wants to enable more people to build their own home. If you are interested in building your own home, you can register your interest on the national self-build register ('need a plot'). Go here:

<http://www.selfbuildportal.org.uk/>

**How can the Broads Authority make it easier for people to build their own homes?**

Could the BA release more brown field sites for housing development and residential development?

#### **Q5: Design**

Design of development in the Broads is very important. The area is acknowledged and protected for its waterways, special landscape, biodiversity, culture and heritage.

**Do you think design of development is important?**

- Yes YES ☐
- No ☐

**What design aspects do you like? What kind of design do you not like?**

We would prefer quality design, quality materials and integration of structures into the landscape. It might be an important enough issue to have a design panel who could meet to review individual planning applications, so that both design and materials are sympathetic with the Broads area. In this particular area most structures are single storey and made from wood.

#### **Q6: Water efficiency**

We are considering making it a requirement for new houses to be more water efficient to help protect the environment, but we are aware that measures like water efficient taps and showers are replaced with less efficient ones by people who move in later on.

**What do you think about requiring houses to be more water efficient?**

- Support? yes ☐
- Against? ☐

**Do you have any comments?**

This is important as water will be an issue for us all in the future.

#### **Q7: Tranquillity**

The simplest way to describe 'tranquillity' is 'getting away from it all'. The elements of tranquillity include the perception of a lack of noise, low or no levels of light pollution and low or no impacts from built development. Some people think that you can get away from it all in some parts of the Broads.

**Where in the Broads do you think you 'get away from it all' and why do you think that?**

Hickling, Horsey and any other part of the Broads where there are fewer people and traffic. The bungalows are particularly tranquil during the early hours and evening times.

There is a form to fill in. **You can go here to fill out the form:**

<http://www.broads-authority.gov.uk/broadsconsultations>

### Q8: Light pollution

We are currently assessing how dark the skies of the Broads actually are. Dark skies are attractive to many people as they add to tranquillity and enable appreciation of the night sky. Early results indicate that we do have some areas that are quite dark and not greatly affected by light pollution.

**Do you think the Broads Authority should try and address light pollution?**

- Yes? Yes ☐
- No? ☐

**Why do you think this?**

Areas such as the Thurne Bungalows do not have street lighting, traffic lighting, or shop lighting. We appreciate this as it allows starlight to be visible from house and garden. The total absence of lights allows star, planet, comet, meteorite and space station gazing.

### Q10: Redundant boat yards

Traditionally many of the buildings by the waterside are used for boat related businesses, but if these businesses move away from the waterside vacant buildings are left. Currently, we tend to say that these kinds of buildings should be reserved for boat related businesses.

**Should we...**

- Ensure such sites are for boat related businesses only? No ☐
- Open the sites up to other types of business, not just related to boats? Yes ☐
- Allow the site to be used for anything, not just business (please note that there are some constraints on these sites, such as flood risk which means that only certain types of land use can go there)? No ☐

**Why do you think this?**

It is becoming increasingly difficult for small boat yards to succeed and so do we leave the sites vacant? It would be better to encourage a wide diversity of uses and/or businesses rather than a derelict site which could then be vandalised and become an eyesore.

### Q11: Heritage Interpretation

Heritage, history and culture are important parts of what makes the Broads special. When sites change their use, links to their previous use could be preserved by incorporating some of the previous features into the new design. Or there could be art or plaques to provide information and interpretation.

**Do you think linking to the past use of a site is important?**

- Yes? Yes ☐
- No? ☐

**Why do you think this?**

The merits of sites vary from area to area, and the previous uses that they had. The Broads Authority could develop a heritage trail around redundant Broads sites with suitable signage or interpretation to pinpoint the former use of these sites. Where, for instance, can you still find a working traditional Staithe?

### Q12: Local Green Space

Is there a green area in your community that is important to you? Do you want to protect it? If so, please let us know! We are asking communities to nominate areas of Local Green Space for us to consider. There is a form to fill in. You can go here to fill out the form: <http://www.broads-authority.gov.uk/broadsconsultations>

**Where in the Broads do you think there are areas of 'Local Green Space' and why do you think that?**

Bridge Green at Potter Heigham is an important green space for this community. The Picnic Area at Pugg Street Staithe is also an area used by walkers and residents on the riverbank. ( owned by the Thurne Bungalows Management Company) There is an area to the East of Potter Heigham Bridge ( on the old Bridge Inn Site) which is an open space but would benefit from enhancement works and seating areas.

### Q13: Sites

We have come up with a list of sites in the Broads that might particularly benefit from being looked at as we produce the Local Plan. If you know these sites, please tell us if you think we should look into the site a bit more and what you would like the future of the site to be.

Site and Settlement	Description
Beccles Old Hotel Site, opposite Morrison's	This site had consent for a hotel which has now lapsed and it is not allocated for a hotel in the Sites Specifics Local Plan due to constraints like access and flood risk. The current open and green site is prominent at the gateway to Beccles.
Bridge Hotel, Potter Heigham	Built in 1869 this hotel burnt down in 1991. The site has had a series of temporary consents for car parking.
Little Precinct in Hoveton	This is one of the few retail areas in the Broads (see the retail section). There are around 10 units along the precinct and current occupiers include a bank, a post office and shops. There is street furniture such as benches and bins. The upper floors are office space.
Former Waterside Rooms at Hoveton	This is a former pub site, where the building has been closed since the mid-1980s and is currently boarded up. It is in poor condition and impacts adversely on the waterfront and the streetscape. The current building is likely to be unsuitable for renovation.
Former Loaves and Fishes Pub at Beccles	This is a former pub site, where the building has been closed since the mid-1990s. It occupies an attractive location to the rear of Beccles Quay.

**What do you think about the Beccles Old Hotel Site? What could it be used for?**

**What do you think about the Bridge Hotel Site at Potter Heigham? What could it be used for?**

Please see above. We feel that this is an area that is wasted and should be developed. The difficulty is that it is privately owned. No improvements have been made to the site in approximately 20 years. It is at present used as temporary car parking for holiday makers hiring bungalows and for owners of riverside bungalows, fisherman and contractors working on the riverside properties. A pleasant, thoughtful and well designed space/area, respectful of this unique site next to an ancient monument would greatly enhance this part of the Broads. We would value this as a riverside community.

**What do you think about the Former Waterside Rooms in Hoveton? What could it be used for?**

**What do you think about the Little Precinct in Hoveton? What could it be used for?**

**What do you think about the Former Loaves and Fishes at Beccles? What could it be used for?**

**Are there any other sites in the Broads that you think we should specifically look at through the Local Plan and what could they be used for?**

We think that you could look at the Broads Haven Tavern Site which is in danger of becoming derelict. As a public house it has a history of failure, it now has new owners who are considering the future of the business. The Broads Authority should do all it can to assist a long term use of this facility, either as a functioning Public House or an imaginative design let solution that will enable this important site, again next to the Ancient monument, to be used by the public, residents and visitors to the area.

**Q14: Developer contributions**

Sometimes, when we approve large developments, we request money from developers to benefit the local community. Some examples of how we spend this money include moorings, community facilities, play areas and public access. Do you have any thoughts on how we can spend this money to benefit your community?

**What parish do you live in?**

**Potter Heigham**

**What do you think developer money should be spent on in your community and why?**

1: Footpaths along Weavers Way, enhancing the surface of the footpath.

2: Roundabout at the Post Office.

3: Enhancement works within the area of Potter Heigham Bridge.



### About you

By giving us your name, you give us permission to publish your comments alongside your name. We will only use your details in relation to the Broads Local Plan. Your contact details will not be made public, just your name and organisation.

- Name: Diana Cornell
- Organisation: The River Thurne Tenants Association
- Phone number: [REDACTED]
- Email address: [REDACTED]
- Postcode: [REDACTED]
- Age band:  
0-9    10-19    20-29    30-39    40-49    50-59    **60-69**    70-79    80-89    90-or older
- What is your ethnic group?
- *This is not appropriate as I represent a large group of people with different ethnicities.*

### Your connection with the Broads

- Do you live in the Broads? Yes ☐
- Do you live near the Broads? Yes ☐
- Do you visit the Broads? Yes ☐
- Do you operate a business in the Broads? ☐
- Do you work in the Broads? ☐
- Other (please specify): ☐

I am the chairman of the River Thurne Tenants Association, an organisation that represents the owners/ leaseholders of 219 bungalows/ mooring plots on the banks of the River Thurne. I own a house in North Norfolk and a leasehold plot with bungalow on the River Thurne. My bungalow is recently 'locally listed'. For 19 years I was a Trustee of the Museum of the Broads. I have written a History of the Thurne Bungalows.

### Please tick one of the below...

- Please add me to the contact database to receive updates about the Local Plan    **Yes**    ☐
- Please DO NOT add me to the contact database to receive updates about the Local Plan    ☐

### How we will use these details...

I understand that the Broads Authority will only use the details I provide for the purposes of producing the Local Plan and will store my details in line with data protection rules Yes ☐

### How to get this questionnaire back to us.

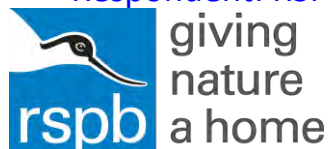
- If using Survey Monkey, just press submit!
- If you filled this out on electronically, just email it to [planningpolicy@broads-authority.gov.uk](mailto:planningpolicy@broads-authority.gov.uk).
- If you have printed it off, post it to Planning Policy, Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY.

### What next?

We will read all the responses we get to this consultation. We will log them on our system with our response which will say how we will deal with the points you make as well as why. This will eventually be in the public domain. These

comments will help inform the next stage of the process which is developing Preferred Options. We will consult on the Preferred Options version of the Local Plan in autumn 2016.

**Thank you for taking the time to fill out this survey and tell us what you think!**



Ms Beal  
Planning Policy Officer  
Broads Authority  
Yare House  
62-64 Thorpe Road  
Norwich  
NR1 1RY

08 April 2016

Dear Ms Beal

**Re. Broads Local Plan Issues and Options Consultation**

Thank you for the opportunity to comment on the Issues and Options for the Broads Local Plan.

In general, we agree that the Plan correctly identifies and considers some major areas of concern for the environmental conservation of the Broads, and the Authority's commitment to halt and reverse the decline in species and habitats. The environment within the Broads is recognised, legally and otherwise, to be an important and sensitive area for a number of habitats and species. The risks to habitats and species posed by development, water abstraction, tourism etc. which have been identified in the Plan should be of the highest consideration when deciding which options will be preferred. This is necessary given the intrinsic link with other qualities of the Broads (e.g. landscape and recreation) that make The Broads such an attraction for residents and visitors.

We note the inclusion of an Interim Sustainability Appraisal, and the intention to carry out a Habitats Regulations Assessment (HRA), at the Preferred Options stage. We note that it would have been possible to carry out a HRA on the various options available at this stage, and this would have helped in forming an opinion as to which should be the correct option to pursue. However, we acknowledge that there was no specific requirement to undertake this assessment at the Issues and Options stage.

Many of the issues raised by the option choices in the draft Local Plan are covered under the HRAs for the Broads Plan and the Sustainable Tourism in the Broads 2016-20 document. We agree with many of the conclusions drawn in those HRAs and would expect the Authority to be cognisant of those when deciding which options to pursue in the future Local Plan Preferred Options document.

Having reviewed the draft Local Plan, we have concerns that it currently lacks a map showing the locations of protected sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs) etc. This should be included, together with an explanation of their important features, legal protection and vulnerabilities. The lack of map, and lack of discussion of these sites or inclusion of them as named areas, causes concern that these sites are not being accorded their required importance. In this instance there has been a missed opportunity to provide information to members of the public with information regarding the importance of the sites,

Eastern England Regional Office  
Stalham House  
65 Thorpe Road  
Norwich  
Norfolk NR1 1UD

Te [REDACTED]  
[REDACTED]  
[REDACTED]  
[rspb.org.uk](http://rspb.org.uk)



The RSPB is part of BirdLife International,  
a partnership of conservation organisations  
working to give nature a home around the world.

and a context to provide realistic aspirations for a variety of activities they may wish to recommend. We would suggest that future iterations of this document include such information.

We look forward to the publication of the Recreational Impact Study that is currently being undertaken, and which is due in Spring/Summer 2016. This should provide an indication of the vulnerability of Natura 2000 sites to increased recreational pressure and provide a baseline understanding to inform the future HRA. It may also influence the options that the Broads Authority choose to take forward at the Preferred Options stage.

Further to the general points made above, specific comments we have on particular Issues, Options or Questions raised in the consultation document are as follows:

#### SWOT analysis (p22)

Whilst the SWOT analysis recognises threats such as fragmentation, pressure from development, threats from inappropriate management etc., as well as opportunities such as that to develop recreational management (presumably to limit impact on protected sites), no mention is made of the specific risk of damaging a legally protected site, or to the Local Plan being found to be unsound due to being undeliverable in the context of the protected sites.

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

The Authority must ensure that, whichever option is chosen, they are confident that the use of anti-fouling paint is managed in a way that ensures that it does not cause damage to the ecosystem, particularly to designated features or habitats.

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

Tertiary treatment of waste water has been a long standing discussion in The Broads. It is the RSPB's understanding that there are current technological limitations to improving effluent discharge to the rivers and reedbeds as an additional filtration system may provide a solution to helping meet Water Framework Directive, Natura 2000 and SSSI targets. The development of additional reedbed habitat could deliver multiple benefits, especially helping to maintain and enhance ecological networks and landscape character.

#### The use of SuDS (p36)

Appropriate use of SuDS and RSuDS can benefit the environment, for example by correctly using reedbed filtration systems. The RSPB has published guidance which can be found at [https://www.rspb.org.uk/Images/SuDS\\_report\\_final\\_tcm9-338064.pdf](https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf).

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

The RSPB considers that there does need to be a guiding principle established as to the requirement for open space and play areas to be included in the design of developments. It should be clear what would be expected to be provided, although the scale of provision could be determined by the planning process.

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

Subject to the outcome of the Recreational Impact Study, and the Sustainable Tourism Consultation, and complementary to them, a Strategic Green Infrastructure policy that identified, protected and linked the

best conservation areas, and allowed for climate change adaptation, would be a valuable strategic planning tool. This would lead us to conclude that Option 2 would be the most appropriate.

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

A strategic approach to climate change which, for example, connected areas to allow for movement of species, or identified and adapted areas which would be able to take extra water in the future, should be adopted.

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

As outlined in the document, peat is a finite, ecologically valuable resource that supports internationally important species and habitats. It is not possible to mitigate for its loss as it cannot be recreated in any reasonable timeframe. The chosen option needs to minimise disruption, protect and restrict removal of peat soils. The wording needs to be carefully considered as some operations which are beneficial to the conservation of the Broads and the maintenance of internationally important species and habitats requires the carefully controlled and monitored removal of peat for conservation purposes, e.g. the creation of turf ponds and scrapes. A combination of Options 2 and 6, with a caveat that disturbance or small-scale removal for the management of land for conservation should be permitted, could be used to ensure the correct level of protection is appropriately applied.

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

The allocation of non-designated, but biologically and ecologically important sites would be valuable. The acknowledgement of the features that are important to the Broads would help ensure that planners could ensure that developers fully understood the impacts of their developments and sought to minimise harm and enhance the recognised features. This would ensure that strategically, developments would enhance existing ecological networks and contribute to the aim of bigger, better and more joined up areas for conservation. Option 2 would be appropriate.

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

The Local Plan should acknowledge the possibility that brownfield sites could be of 'High Environmental Value' and should require the developer to establish whether that is the case as part of the application process. Option 2 would therefore be appropriate.

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

This issue and policy can only realistically apply to non-designated areas, and we would expect that to be stated. Unless carefully worded, there is a danger that this policy could be confused with the requirements of the Habitats Regulations and infer that residual adverse biodiversity impacts from developments in Natura 2000 sites (SPA, SAC, Ramsar) could be considered. It is only in exceptional circumstances, where there are no alternative solutions, that a plan or project may meet the tests of Imperative Reasons of Overriding Public Interest (IROPI), which then requires demonstration that appropriate compensation will be provided to ensure the integrity of the Natura 2000 network is not compromised. Given the rigour of these tests, the presumption is that plans or projects that could adversely affect Natura 2000 sites will not be approved. In practice, schemes which qualify for IROPI are extremely rare and are very unlikely to fall under the Council's remit for decision-making.

Development in Natura 2000 sites cannot normally therefore be allowed to take place if there would be a 'residual adverse biological impact', and this requirement supersedes the NPPF paragraph 118 referenced

in the document. As above, a map showing these areas, with an explanation of their designated features, the Habitats Regulations process, and the fact that if an impact cannot be avoided or prevented through mitigation, development cannot take place, should be included in the Local Plan.

In the case of SSSIs, the Authority has a duty under Section 28G(2) of the Wildlife and Countryside Act, public bodies must:

*"...take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest".*

In any event, the tests of the NPPF require that benefits of the proposed development must be weighed against the harm to the SSSI and the broader network, and not the residual harm of the proposal taking into account any proposed compensation. Compensation is a last resort (as set out in paragraph 118) and should only be considered when it has been proven that no alternatives to the proposal exist, and that the benefits outweigh the harm to the SSSI in its notified state without the development.

We support Footprint Ecology comments in the HRA for the Broads Plan (Appendix 3, comments on point 6.1.3), which addresses issues of legality i.e. it is not possible to permit development which cause adverse impacts on European Sites, and language i.e. use of the word 'compensation'.

We would welcome a policy that confirmed the hierarchy described in NPPF paragraph 118, and which required measures to address residual harm to biodiversity in non-designated areas, but any policy would need to state that it excluded development within or near European Sites which would require HRA. The word 'compensate' should not be used in this option and would cause confusion.

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

As above, this can only apply to non-designated areas. Any land-raising in European sites will require assessment under the Habitats Regulations.

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

As above, this can only apply to non designated areas. Any disposal of excavated material in European sites will require assessment under the Habitats Regulations.

#### Priorities for developer contributions (p154)

The Authority needs to ensure that it receives sufficient funds from development to manage pressures on Natura 2000 and other designated sites. This includes monitoring the level of increased recreational use against predicted levels, monitoring to assess adverse impacts on the ecology of the sites and their designated features, and, if it becomes apparent that an LSE may occur on a Natura 2000 site, funding appropriate visitor control and management actions in order to prevent that LSE from occurring.

As above, we expect options to be chosen with full regard for the impact on species and biodiversity, whether impacting upon a statutorily designated site or not. We look forward to the Preferred Options version of the Local Plan, and accompanying HRA, and anticipate commenting further at that stage.



Please contact either myself or Phil Pearson if you have queries regarding our submission.

Yours sincerely



**Matt York**  
**Assistant Conservation Officer**  
**RSPB Eastern England**  
Email: [REDACTED]  
Direct dial: [REDACTED]

Respondent: Sabberton, P

**Lottie Carlton**

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**From:** Peter Sabberton <[REDACTED]>  
**Sent:** 07 April 2016 15:48  
**To:** Broads Plan  
**Subject:** Broads Local Plan Review

Please accept the following comments as part of the public consultation.

#### Broads Local Plan Review

The Broads Authority executive area is primarily an undeveloped natural environment. However due to the way boundaries have been drawn it incorporates parts of existing settlements towns and villages. The needs objectives and possibilities for these areas are very different to the predominantly undeveloped landscape of the broads as a whole. In order to not only protect but enhance the living and working areas that are (accidentally?) included policies need to be sufficiently flexible to provide for and promote the needs of existing and growing communities.

As part of the review of the broads local plan I would like to see some flexibility introduced to allow consideration of development opportunities in areas that are either too small or that may not have been identified in the formal plan process as suitable for development.

We have an interest in a potential development in Chedgrave which is a small site suitable for 3 new homes. It is fully sustainable in being virtually next to the town facilities in Loddon. Our earlier application BA/2015/0123/FUL completed the consultation process which did not highlight any physical constraints to the development of this small area. However following a meeting with officers we were left with no choice other than to withdraw as the land had not been identified as a potential development area in the current plan and was therefore against the strictly regimented process.

Whilst appreciating that development particularly on larger scale has a significant impact upon an area and needs to be carefully controlled and sited very small scale development can be absorbed into the existing landscape with only minor impacts. Towns and villages have historically grown organically and I would like to suggest that some flexibility should be introduced into the plan process to enable such sympathetic growth to continue in locations which may not have been identified at the time of formulation of the long term plan. Such small developments are ideal to cater for local need and contribute to the viability of existing local facilities and services.

Regards

Peter Sabberton

Brian Sabberton Limited  
[REDACTED]  
Tel [REDACTED]  
Registered in England No [REDACTED]

Respondent: South Norfolk Council

**Lottie Carlton**

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**From:** Natalie Beal  
**Sent:** 29 February 2016 08:36  
**To:** Lottie Carlton  
**Subject:** FW: Broads Authority Public Consultations: Broads Plan and Broads Local Plan

**From:** Keith Mitchell [REDACTED]  
**Sent:** 23 February 2016 13:29  
**To:** Natalie Beal  
**Subject:** FW: Broads Authority Public Consultations: Broads Plan and Broads Local Plan

Dear Natalie

Carole will be co-ordinating the Council's response. Meanwhile I am looking at the housing aspects of the Broads Local Plan.

I have a query on OAN. The text on page 165 says that OAN is 253 or 274 (and page 120 refers to 274). Page 113 (reflecting the figures in Figure 94 on page 166) says that OAN is 320. Is there an explanation for this?

Keith Mitchell  
Housing Enabling and Strategy Officer  
t [REDACTED] [www.south-norfolk.gov.uk](http://www.south-norfolk.gov.uk)



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**From:** Carole Baker  
**Sent:** 18 February 2016 16:42  
**To:** Keith Mitchell; Tony Cooke; Rachael Raine; Bob Wade; David Howard; Andy Sheppard; Adrian Nicholas; Julian Munson; Helen Mellors  
**Cc:** Adam Nicholls  
**Subject:** FW: Broads Authority Public Consultations: Broads Plan and Broads Local Plan

Hi everyone

You have all been identified as people who manage teams who would be able to contribute to a South Norfolk Council response to the Broads Plan and Broads Local Plan consultations (see email below). Tim Horspole has been asked to take a lead on this by SLT and I have been tasked with coordinating a response across the Council. The closing date for responses is Friday 8 April.

I've spoken to Tim and he has asked me to coordinate a meeting to discuss this (invitation to follow), I would be grateful if you, or a member of your team could read the parts of the consultation documents of relevance to your section and then come to the meeting with some comments/ideas for the consultation response.

If you wish to delegate this to another member of your team I would be grateful if you could let me know who that would be.

Kind regards  
Carole

## **BROADS LOCAL PLAN - ISSUES AND OPTIONS CONSULTATION**

### **SOUTH NORFOLK COUNCIL RESPONSE**

#### **GENERAL POINT**

For information the South Norfolk Council address has recently changed. Future consultation documents should refer to the new postal address which is:

South Norfolk House  
Cygnet Court  
Long Stratton  
Norwich  
NR15 2XE

#### **SECTION 5: DUTY TO COOPERATE**

##### **Q. Do you have any thoughts on the Authority's approach to Duty to Cooperate?**

South Norfolk Council welcomes the Broads Authority's continued commitment to engage through the Duty to Cooperate. The Norfolk Strategic Framework is mentioned in the list of examples but should reference also be made to the Greater Norwich Local Plan? Although the Broads Authority is not part of the Greater Norwich Growth Board there is Broads Authority representation on Greater Norwich Local Plan Review working group.

#### **SECTION 6: CHALLENGES AND OPPORTUNITIES**

##### **Q: Do you have any thoughts on these challenges and opportunities?**

This seems to be a comprehensive assessment of the strengths, weaknesses, opportunities and threats that are relevant to the Broads Local Plan. Could the current bullet point 'Provide jobs, facilities, services and homes for local residents through the development plans of constituent Local Authorities' be reworded to read something along the lines of 'Provide jobs, facilities, services and homes for local residents through the Broads Local Plan or the development plans of constituent Local Authorities through the Duty to Cooperate' to recognise that there may be opportunities deliver jobs, housing etc. in the Broads Executive Area?

## **SECTION 7: VISION, OBJECTIVES AND EXISTING POLICIES**

**Q: Do you have any thoughts on the special qualities of the Broads?**

No comment. The list seems to accurately reflect the special qualities of the Broads.

**Q. Do you have any thoughts on objectives or vision for the Broads Local Plan?**

No comment, other than the Vision and Objectives in the Broads Local Plan should reflect the content of the new Broads Plan.

**Q. If you have any thoughts on our existing policies, please let us know**

No comment.

## **SECTION 8: WATER**

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

No comment

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

At this stage South Norfolk Council is happy to support the Broads Authorities desire to explore the potential to reduce water usage in new development beyond Building Regulations with the caveat that water issues are likely to be considered through the Norfolk Strategic Framework.

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

South Norfolk Council would support the consideration of water consumption of non-residential development through the Broads Local Plan as all types of development should be seeking to maximise water efficiency.

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

No comment

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

No comment. The issue of updating Strategic Flood Risk Assessments will be considered through the Norfolk Strategic Framework.

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

The proposal to follow Government guidance to see if SuDS is required on a site is supported. The future management responsibility for swales and retention ponds should be carefully considered.

## **SECTION 9: OPEN SPACE (LAND AND WATER), PLAY AND ALLOTMENTS**

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

South Norfolk Council would support Option 3 to include a policy in the new Local Plan that refers/defers to existing and future play and open space policies in constituent districts policy documents. South Norfolk is planning to review its current open space standards in the near future and some early dialogue has taken place with the Broads Authority about being involved in this process.

The issue of management of open space and play areas needs to be carefully considered and it should not be assumed that South Norfolk will automatically take on responsibility for management.

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

Access to the water should be considered as part of any planning proposal or potential allocation to ensure that public accessibility to the Broads is maintained.

## **SECTION 10: GREEN INFRASTRUCTURE**

### **Issue 5: How do we address Green Infrastructure in the Broads Executive Area?**

South Norfolk Council would support Option 2, a strategic Green Infrastructure Policy to fulfil the requirements of the NPPF. There needs to be links to Green Infrastructure provision in neighbouring authorities and the outcome of the forthcoming recreational pressure study will need to be taken into account. There may be a need for Green Infrastructure provision to take the pressure of particular areas in the Broad by providing alternative locations for people to visit.

### **Q. Are there any areas you would like to nominate as Local Green Space?**

No

## **SECTION 11: CLIMATE CHANGE**

### **Issue 6: How should we address climate change in the Local Plan?**

To incorporate the requirements of national policy the Broads Local Plan should include policies to address both the mitigation of, and adaptation to climate change.

## **SECTION 12: PEAT**

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

No comment

## **SECTION 13: HERITAGE AND HISTORIC ASSETS**

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

South Norfolk Council would support Option 3 (A stronger policy on undesignated heritage assets) on the basis that this would strengthen existing policy and align better with the NPPF.



**Q. Is having a guide and no specific policy an approach which you support (waterside chalets)?**

No comment

**Issue 9: How can the Local Plan help to enable restoration of the drainage mills of the Broads?**

No comment

**Q. Do you have any thoughts on this approach (archaeology)?**

South Norfolk Council would support the improvement of existing policies to reflect the identification of the Broads as an area of exceptional waterlogged heritage.

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

No comment.

#### **SECTION 14: BIODIVERSITY**

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

South Norfolk would support Option 2 to recognise non-designated sites.

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

No comment

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

No comment

#### **SECTION 15: RENEWABLE ENERGY**

**Q. Do you have any thoughts on our position on this matter (Wind energy)?**

South Norfolk Council strongly supports the Broads Authority in its consideration that allocating land within the Broads Authority Executive Area for wind turbines is not appropriate.

## **SECTION 16: LANDSCAPE CHARACTER**

**Q. Do you have any thoughts how the LCA could be interpreted to aid the planning application process?**

South Norfolk Council would support the inclusion of a general landscape policy in the Broads Local Plan although it would be important for any such assessment to be consistent across Local Planning Authority boundaries.

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

No comments

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

No comments

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

South Norfolk Council would support Option 2 for the inclusion of a landscaping policy in the Broads Local Plan.

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

South Norfolk Council would support either Option 2 or 3 to reduce the impact of overhead lines/cables on the Broads area. South Norfolk support a similar initiative in the Waveney Valley

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

South Norfolk Council would support Option 2 for the inclusion of a criteria based policy in Broads Local Plan to deal with proposals on the settlement fringe.

## **SECTION 17: AMENITY AND TRANQUILITY**

**Q. Do you have any thoughts on existing policy DP28?**

No comment.

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

No comments

**Issue 19: How should we address tranquillity?**

South Norfolk Council would support a combination of Options 1 and 2, rolling forward existing policy whilst assessing other areas that should be considered as tranquil areas. We would not support Option 3 as a more strategic policy is not likely to be appropriate for the whole of the Broads area and may have implications for South Norfolk district and put pressure on us to also identify areas of tranquillity.

**SECTION 18: LIGHT POLLUTION****Issue 20: How should we address light pollution?**

It may be appropriate to produce a guidance note to address light pollution in the Broads as there may need to be different approaches to light pollution depending upon location e.g. the edge of Norwich compared to the rural Broads. There may be safety issues relating to a lack of light in certain areas and a cost implication of imposing specific types of lighting on developers – link to S106 agreements.

**SECTION 19: RETAIL****Issue 34: How to address retail issues in the Broads Local Plan**

A retail policy is necessary to accord with national policy which directs retail development to defined centres. The absence of a policy would be of concern to South Norfolk Council because of the potential impact unplanned retail development could have on town centres in South Norfolk such as Loddon where we are working hard to retain retail activity, through the Market Town Initiative. South Norfolk Council would support a combination of Options 2, 3, 4, 5 to fulfil the requirements of the NPPF. The policy needs to protect town centres outside the Broads Local Plan Area such as Loddon and engagement with the Loddon and District Business Association on this matter may be beneficial and allow them to represent the feelings of businesses in the area.

**SECTION 20: TRANSPORT****Q. How can the waterways be used more for freight and transport purposes?**

No comment.

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

South Norfolk Council supports the dualling of the Acle Straight because, whilst acknowledging that there will be environmental concerns, it has the potential to bring significant economic benefits to the area. A criteria based policy may be best way forward without being too prescriptive about the precise land take needed for the scheme.

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

South Norfolk Council considers that the safeguarding of future recreation routes is important for recreation and connectivity. There are potential links to schemes that impact on South Norfolk e.g. Angles Way, Waveney Valley with the potential to work together under Duty to Cooperate. There is concern about the long term management and maintenance of some routes.

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

No comment

**SECTION 21: THE BROADS ECONOMY****Issue 38: What should the Authority's approach be for redundant boatyards or boatyard buildings?**

No comment.

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

South Norfolk Council would support a combination of Option 2 and 3 aimed at directing employment uses to sustainable locations. It would be for the Broads Authority to assess whether any allocations for employment land are needed. Close working with constituent authorities would be needed to ensure they are no conflicts with potential allocations in neighbouring authorities.

## **SECTION 22: SUSTAINABLE TOURISM**

### **Issue 40: How to address sustainable tourism in the Local Plan?**

SNC would encourage sustainable tourism in the Broads Area as it would be good for the wider economy of South Norfolk. The provision of facilities for tourists e.g. public toilets needs to be carefully considered. South Norfolk Council would support a combination of Options 2, 3 and 4 e.g. a general policy seeking to retain tourist facilities combined with the potential for additional policies for specific tourist attractions if considered necessary. Any policy will need to refer to and link with tourism initiatives across neighbouring Local Planning Authorities as there are relationships between the Broads and attractions outside Broads Authority Executive Area (for example Loddon and access to the Southern Broads).

## **SECTION 23: NAVIGATION**

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

No comment

**Q. What are your thoughts on electric charging points? How can a network of charging points be delivered at reasonable cost and without impacting on landscape?**

No comment

## **SECTION 24: HOUSING**

### **Issue 22: How can the Local Plan address the Full Objectively Assessed Housing Need of the Broads?**

**Q. Do you have any comments on the issue of meeting the objectively assessed housing need of the Broads?**

As participants in the Central Norfolk Strategic Housing Market Assessment (SHMA) we believe that it provides a sound analysis of OAN in the Broads. We note that the OAN for the 24 year period from 2012 to 2036 is 320 dwellings, an average of 13.33 per annum.

This is a realistic basis for a housing target which appears to be achievable so we support Option 2 – meet the full OAN by allocating sites to meet the residual requirement. However, we would accept the implications of a smaller total allocation

if it proved impossible to identify sufficient viable sites without significant environmental impact. In such a situation the unmet residual need would have to be met elsewhere, possibly including South Norfolk.

**Q. Do you have any comments on this approach (affordable housing)?**

Paragraph 20.3 of the document states “It is acceptable that the Broads Authority defers to the affordable housing policy of our constituent district”, and we welcome this clear statement. However the percentages in the table and later text might lead to some ambiguity, so we request clarification of “We intend to roll forward the policy approach of using the percentages of our districts”. Please be explicit that:

- The SHMA provides an evidence base of need for affordable housing
- The policy targets of the constituent districts reflect the necessity to seek higher percentages than the SHMA figures because some sites will deliver less on justified viability grounds
- The Broads Authority defers to all aspects of the affordable housing policy of its constituent districts, not only the percentage targets.

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

South Norfolk Council would support Option 2 to have a criteria based policy in the Broads Local Plan to allow any applications for Gypsies and Travellers which might come forward to be assessed. Consideration should be given to the inclusion of criteria which would cover both land and water based gypsies. South Norfolk Council will continue to work with the Broads Authority on Gypsy and Traveller issues under the Duty to Cooperate.

**Q. Are there any areas which you think are suitable for residential mooring?**

No comment

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

South Norfolk Council would support the principle of floating buildings, particularly as they may facilitate the development of the Deal Ground, a key allocation for the Greater Norwich area.

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

No comment

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

No comment

## **Housing for Older People**

We agree that helping older people to maintain their independence is important. This might involve the development of specially designed housing, often with on-site support and care. The type, size, tenure and location of such accommodation is important. Because of the wider strategic aspects and the relatively small population of the Broads, we agree that joint working is the best approach. Consequently we support the proposal to monitor evidence, and address the issue in future versions of the Local Plan.

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

Since the consultation paper was issued, the Government has issued Regulations requiring the Broads Authority to hold a register of people wishing to acquire a serviced plot within the administrative area. The register is open to anyone who is a national of the European Economic Area. Given the attraction of the Broads, this might lead to significant numbers registering. A consequence would be pressure to permit custom build in locations which might be inappropriate.

We prefer a combination of Option 2 and Option 3 – plots on allocated sites and requiring housing sites over a specified size to require a specified proportion of plots to be delivered as serviced plots for custom build. Bearing in mind the potential demand, even a twin track approach might not suffice to deliver sufficient plots.

DCLG consultation on proposed changes to national planning policy (December 2015) suggested (para 24) that ‘proposals for development on small sites immediately adjacent to settlement boundaries should be carefully considered and supported if they are sustainable’. Such proposals might come forward adjacent to settlements within and outside the administrative boundary on the basis of providing serviced plots, creating pressure to approve, notwithstanding clear environmental sustainability issues in the Broads.

Because of the potential pressure on unallocated sites adjacent to settlements within and adjacent to the administrative boundary, we suggest that the Broads Authority considers seeking Exemption status under the Housing and Planning Act 2016 (as it will be), and reflects this in planning policy if it chooses to do so. If successful, provided the Bill remains unchanged, this would exempt the Broads Authority from having to give planning permission to meet demand. We accept that this might result in more applications to other local planning authorities, including South Norfolk.



## **Starter Homes**

The Government regards Starter Homes as a key means of increasing the number of homes built while improving access to low cost owner occupation. Such homes are appropriate on allocated sites.

The DCLG consultation on proposed changes to national planning policy (December 2015) suggests (paras 45-47) that rural exceptions sites are to be permitted for Starter Homes, with the local planning authority to only exceptionally “have the flexibility to require a local connection test.” If the Government was to introduce this as proposed, the Broads Authority might wish to use the Local Plan as a means of justifying a local connection test on the grounds of environmental protection. Such an approach could extend to areas of the Broads which are adjacent to settlements outside its administrative boundary.

## **SECTION 25: DESIGN**

### **Issue 27: How to address design in the Broads Local Plan**

Policy could refer to addressing context of development in the Broads with surrounding areas. There is also a wider strategic need to promote the highest standard of design in the Broads to preserve and enhance their value as a tourist destination, which would obviously have wider economic benefits for South Norfolk Council.

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

DP7 sounds like it is in line with JCS Policy 2. Not too familiar with the Fabric First concept but presumably this would create a difference in standards with ourselves if this has any implications for us

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

No comment

### **Issue 30: How should we consider leisure plots in the new Local Plan?**

No comment, other than support for the Broads as a centre for tourism

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

From our recent experience in developing our Local Plan Development Management Policies document, we are not aware of any evidence that would support the adoption of space standards.

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

No comment.

## **SECTION 26: SPORT AND RECREATION VENUES/BUILDINGS**

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

South Norfolk Council would support a combination of Options 2 and 3. There should be a generic criteria based policy relating to indoor sports facilities to safeguard their continued use, guide future development and to provide a policy for which changes of use could be considered. In addition the Local Plan could also include site specific policies for key sports facilities in the Broads area where there are particular aspirations, constraints or specifications for the site which could not be covered by a more generic policy.

## **SECTION 27: HEALTH AND WELLBEING**

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

The Health and Wellbeing agenda is currently being heavily promoted and should be encouraged through planning policies. Is there any issue with the Broads having a list as set out in option 2 and making it more onerous than South Norfolk Council requirements? If the idea of a checklist was to be pursued we would be keen to work with the Broads Authority to ensure there are no adverse impacts from a South Norfolk Council perspective.

**Q. Do you have any thoughts on our position on this matter (health facilities)?**

Some Broads communities depend on facilities within the South Norfolk Council area (e.g. Loddon surgery etc.) and should this be reflected in the Broads Local Plan. We will need to work together with the Broads Authority under the Duty to Cooperate to ensure that the distribution of growth across the Greater Norwich area, including the Broads Authority does not have an adverse impact on the provision of health facilities.

## **SECTION 28: EDUCATION**

### **Q. Do you have any thoughts on our position on this matter (education)?**

South Norfolk Council supports the decision not to include a specific policy on education establishments at this stage on the basis that Norfolk and Suffolk County Councils have indicated that there is not likely to be a requirement for any schools to expand into the Broads Authority Executive Area in the plan period. However dialogue with the County Councils should continue and education is likely to be considered through the Norfolk Strategic Framework.

## **SECTION 29: WASTE AND MINERALS**

### **Issue 21: How to address waste in the Broads Local Plan**

No comment

## **SECTION 30: SAFETY BY THE WATER**

### **Issue 42: How should we consider safety by the water in the new Local Plan?**

No comment

## **SECTION 31: DEVELOPER CONTRIBUTIONS/PLANNING OBLIGATIONS**

### **Q. What are your thoughts on rolling forward DP 30?**

No objections to rolling forward DP30 as it refers to pooling with resources from other authorities to fund wider community infrastructure projects and historically this seems to have worked well in securing funding for infrastructure projects.

### **Q. What are your priorities for developer contributions and why?**

Much of the infrastructure required to support communities and their growth in the Broads will be located in the adjoining planning authority areas, such as schools or transport infrastructure. Our priorities would be for infrastructure that supports growth both in the Broads and South Norfolk – for example addressing any school capacity issues which include catchment in the Broads or road junction improvements along the A146.

## **SECTION 32: SITE SPECIFIC POLICIES**

**Issue 43: How do we protect the car parking are near Staithe and Willow?**

No comment

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

No comment

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

No comment

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

No comment

Respondent: Sport England

**Lottie Carlton**

---

**From:** Philip Raiswell [REDACTED]  
**Sent:** 07 April 2016 10:20  
**To:** Broads Plan; Planning Policy Mail  
**Subject:** Broads Plan 2017 and Broads Local Plan (Issues and Options)

Thank you for consulting Sport England on the above documents.

We would like to make the following comments:

### **Broads Plan 2017**

#### **Providing Distinctive Recreational Experiences (Aspiration 8)**

Sport England supports the general principle of encouraging sport and recreation opportunities within the Broads Authority area. However, we consider that the aspiration should be widened to include the protection and provision of water based sports such as windsurfing, water skiing and wakeboarding, all of which are legitimate uses within the Broads Authority area. The Plan should set out the objective of providing for such activities (including new facilities if required) in designated areas, and ensuring that management regimes are in place and regularly monitored and reviewed.

### **Broads Local Plan (Issues and Options)**

#### **Issue 32 – Sport and Recreational Buildings**

Sport England would support the option to include site specific policies relating to existing sport and recreational facilities within the Broads area, as this will give more detailed policy guidance, and will be based on an up to date evidence base (The Greater Norwich Indoor Sports Strategy). However, we also believe that a generic policy should be included to cover any applications received for new sports facilities or changes of use relating to sports activities within the Broads. Whilst the NPPF gives general policy guidance on this subject, the unique nature of the Broads and therefore the sport and recreational activities that take place within it, requires a more detailed approach to policies relating to the protection, provision and enhancement of sports facilities within the Broads area.

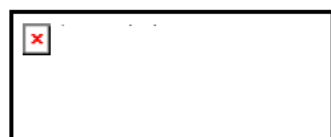
I hope these brief comments are helpful at this stage, we look forward to further consultation in due course.

Please contact me if you wish to discuss the contents of this email in more detail.

Kind Regards,

**Philip Raiswell**  
Planning Manager

[REDACTED]



**From:** Natalie Beal  
**Sent:** 22 April 2016 10:18  
**To:** Lottie Carlton  
**Subject:** Late response - Suffolk County Council

**Broads Local Plan Issues and Options Consultation**

- Page 55, 13.1 A recommendation is that reference to the Norfolk and Suffolk Historic Environment Records should be added, as active databases of the archaeological resource.
- Page 56, 1<sup>st</sup> paragraph – add Historic Environment Records to the list?
- Page 56 Issue 8 Non-designated assets – SCC preferred option would be Option 3: to develop a stronger policy on undesignated heritage assets. This will give greater clarity to applicants.
- Page 57 –Question ‘Is having a guide and no specific policy an approach which you would support?’ - a stronger policy CS5/DP5 (as above, Issue 8, Option 3) would mean that there is a policy to which a guide could relate.
- Page 62 13.5 – The approach to archaeology – question ‘Do you have any thoughts on this approach?. The approach as set out, which involves improved policies CS5/DP5 as well as a strategy led by Historic England, is one that we would support and encourage.
- Page 63-3 Issue 10 – Interpretation and presentation of cultural heritage. An observation is that to overcome potential difficulties with option 2, Option 3, to develop guidance for cultural and heritage interpretation, could work best in combination with clauses in Policies CS5 and DP5 that require outreach and presentation (as proportionate to significance/impacts of development where related to planning). This might give greater clarity to developers. However, as the majority of the Broads area is in Norfolk, we would encourage further discussion with NCC on this issue.
- Page 154 – Priorities for developer contributions – the Broads Authority may wish to explore the potential for contributions towards heritage presentation and archiving (tied to Issue 10).
- Page 156 Site allocations – two are in Suffolk: Beccles Old Hotel and the Loaves and Fishes, Beccles. The Old Hotel site has particular potential for wet deposits. The Loaves and Fishes is in the Historic Core of Beccles. SCC Archaeological Service would be happy to discuss developments on both sites at an early stage, and we’d be happy to comment on any other allocation sites in Suffolk as they come forward.

**Natalie Beal**  
Planning Policy Officer  
01603 756050



Maria Conti  
Strategy and Projects Officer  
Broads Authority  
Yare House  
62-64 Thorpe Road  
Norwich NR1 1R

08/04/2016

Dear Ms Conti,

**RE: Broads Local Plan to 2036 – Issues and Options**

Thank you for consulting us on the above Plan, we have the following comments:

Issue 5 (Green Infrastructure) – We support Option 2, a Strategic Green Infrastructure Policy. Such a policy could also be expanded to include specific GI projects (in line with Option 3), where these have been identified.

Issue 11 (Biodiversity) – We support Option 2, the allocation of sites for recognition of their local wildlife value. We would be happy to discuss such an approach, and the identification of suitable sites, with you further. We would also suggest that if this option is pursued, the County Wildlife Site designation panels in Norfolk and Suffolk could provide helpful input in to the process.

Issue 12 (Brownfield Sites) – We support Option 2 for protecting the biodiversity value of brownfield sites.

Issue 13 (Residual Impacts on Biodiversity) – We consider that any consideration of residual impacts on biodiversity can only be considered once the preceding steps of the mitigation hierarchy have been appropriately and fully applied. In this situation we would support the use of Option 2, a compensation policy. We would also query the use of such a policy for compensating for impacts on sites designated for their European nature conservation importance.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

James Meyer  
Conservation Planner

Suffolk Wildlife Trust,  
Brooke House, Ashbocking,  
Ipswich, IP6 9JY  
Tel: 01473 890089

[www.suffolkwildlifetrust.org](http://www.suffolkwildlifetrust.org)

[info@suffolkwildlifetrust.org](mailto:info@suffolkwildlifetrust.org)

Suffolk Wildlife Trust is a  
registered charity  
no 262777



**From:** peter thomas [REDACTED]  
**Sent:** 06 April 2016 17:29  
**To:** Planning Policy Mail  
**Subject:** Broads Local Plan

**Categories:** Ack

My compliments on a very well presented draft document.

However, I have a few observations to make, which I list as follows :-

- a) As the bulk of the area is a flood flood plain and we are being constantly warned of anticipated rising sea levels, conventional housing would be at risk and probably almost impossible to insure. "Floating accommodation" or building on stilts hardly sounds viable.
- b) Regarding indoor sports facilities, the Broads area is essentially an outdoor experience. Whilst the provision of training facilities related to outdoor activities would clearly be of benefit (particularly with regard to teaching safety), gyms, squash courts and the like would be a distraction.
- c) I'm not aware of a tradition of the gypsy (conventional, or the more recent water variety) culture on the Broads. Surely preference should be given to preserving and promoting the traditional Broads cultures and traditions. Is it part of the gipsy culture to leave piles of waste and rubbish for others to clear?
- d) Regarding safety, the key is to promote a culture of safe thinking and proper leadership by example. The Norwich Riverside development is a prime example of safety barriers being erected at the river bank and drunks climbing over them and falling in.

Regards,

Peter Thomas.

Respondent: Tubby, J

JAMES TUBBY



8<sup>th</sup> April 2016

Attn Natalie Beal

Planning Policy Officer

Broads Authority

Yare House, 62-64 Thorpe Road

Norwich, NR1 1RY.

Ref: 21a Church Close Garden

Dear Natalie

Thank you for our telephone discussion of last week, please find below my request for the reinstatement of my sites as it was under the previous SNDC Local Plan.

When my family bought the land in 1965 this part of the plot was in the existing development area of Chedgrave as shown in the first scan, which was taken from the 1978 Local plan for Loddon and Chedgrave. I bought the Land from my family in 1980 with the development status still in place with the thoughts that I would when the time came be able to build my retirement property in the garden. It came as a shock last year to find when the Broads Authority took over the planning area around the Broads that my garden was excluded, without any formal landowner notification, from its original status of being within the development area for Chedgrave.

I therefore request that the Broads Authority reinstate the plot as shown in scan2 shaded blue to be included in the Local plan as a development area, as it was before the BA took over this area.

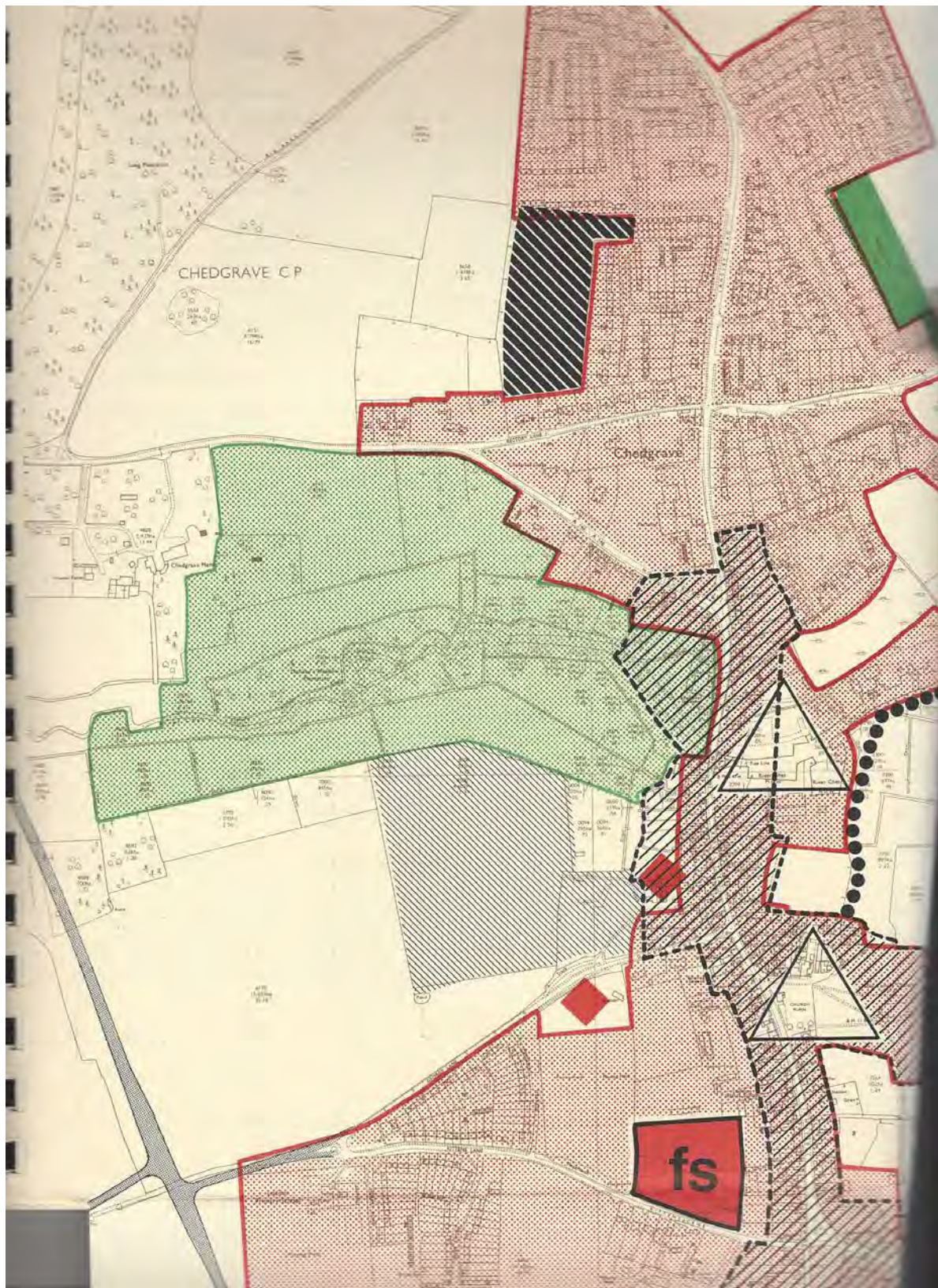
I also attach completed site assessment showing the suitability for development, through the traffic light scoring system on the form.

Yours Sincerely

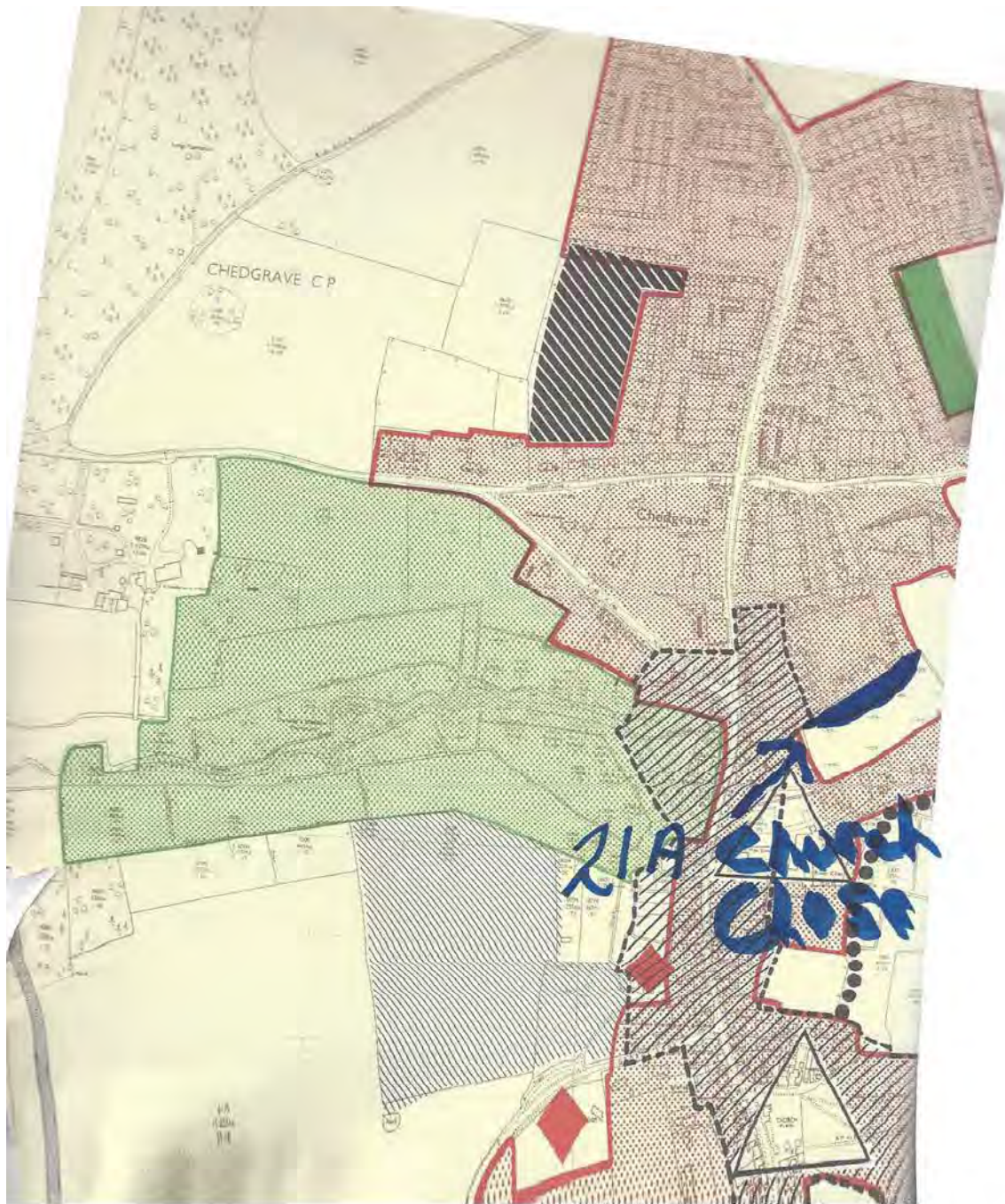
James Tubby











March 2016

## Appendix B – Site Assessment Form

Site address: 21A, CHURCH CLOSE, CHEDGRAVE,		
Current planning status e.g. with permission, allocated, suggested through the Call for Sites etc.		With developed house but now outside development area.
Site Size (hectares)		Approx 0.4 Hectares
Greenfield / Brownfield		Greenfield.
Ownership (if known) (private/public etc.)		J. TUBBY Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		No
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
If yes to any of the above, site will be excluded from further assessment.		
Development Potential 1 + (number of dwellings, hectares of employment land or town centre use floorspace):		
Density calculator		
Suitability Assessment		
Constraint	Score (red/amber/green)	Comments
Access to site	green	



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Accessibility to local services and facilities	green	
Utilities Capacity	green	
Utilities Infrastructure	green.	.
Contamination and ground stability	green.	
Flood Risk	green.	
Coastal Change	green	
Market Attractiveness	green.	
<b>Impact</b>	<b>Score</b> (red/amber/green)	<b>Comments</b>
Landscape, Strategic Gap and/or Agricultural Land	green.	
Townscape	green	
Biodiversity and Geodiversity	green.	
Historic Environment	green.	
Open Space	green.	
Transport and Roads	green.	
Compatibility with neighbouring/adjoining uses	green	
Contribution to Regeneration	green.	
<b>Local Plan Designations (add further lines as required)</b>		
<b>Designation</b>	<b>Policy reference</b>	<b>Comments</b>
<b>Availability Assessment (will require liaison with landowners)</b>		
Is the site being marketed?	No	
Add any detail as necessary (e.g. where, by whom, how much for etc.)		

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When might the site be available for development (tick as appropriate)	Immediately	<u>As soon as planning is complete</u>
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		
Comments		
<b>Achievability (including viability)</b>		
Comments		
<b>Overcoming Constraints</b>		
Comments		
<b>Trajectory of development</b>		
Comments		
<b>Barriers to Delivery</b>		
Comments		
<b>Conclusion (e.g. is included in the theoretical capacity)</b>		

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A Site Map will be included with each assessment form



Respondent: Vanston, R

13 Church Close  
Chedgrave  
Norwich  
NR14 6NH



6<sup>th</sup> April 2016

For the attention of Natalie Beal  
Planning Policy Officer  
Broads Authority  
Yare House  
62-64 Thorpe Road  
Norwich  
NR1 1RY

Dear Ms Beal

**Re: Broads Future Local Plan**

We understand there is a period of consultation regarding issues and options on the future of the Broads Authority development.

We recently contacted you regarding a proposed planning application for development of the land adjoining Church Close which after consideration was deemed unsuitable and Planning Permission denied. We would now like to lodge the following concerns regarding future plans under consideration. They are as follows:-

- At the moment the Local District Council is proposing to grant permission to build in the region of 300 new homes in the immediate area on land more suited for this type of development and which does not impinge on any flood plain.
- There is an increasing trend in the number of landowners clearing sites to remove trees and destroying habitat before submitting planning applications as happened in a recent application for development of the land at 21A Church Close. The proposed development of executive homes on this site not only overlooked other housing in that area it was not in keeping with the environment at all. It is a concern that altering any boundaries could encourage this problem and eventually result in the complete loss of habitat for the rich wildlife we all enjoy and hopefully maintain for future generations.
- We would ask you therefore to please take into consideration the above points made and please, please, protect further encroachment on the wild life environment and habitat.

Yours sincerely

Richard Vanston

**Lottie Carlton**

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**From:** Natalie Beal  
**Sent:** 20 April 2016 11:05  
**To:** Lottie Carlton  
**Subject:** FW: BROADS PLAN CONSULTATION

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**From:** Peter Waller [REDACTED]  
**Sent:** 06 April 2016 21:51  
**To:** Broads Plan  
**Subject:** BROADS PLAN CONSULTATION

31 Romany Road, Oulton Broad, Lowestoft, NR32 3PJ

Dear Sir/Madam

Please accept these as my comments in regard to the forthcoming Broads Plan consultation.

Please also accept that I have grave concerns for the future of and well-being of The Broads.

I have spoken to various individuals, both members and officers of the Broads Authority, non of which have been able to provide any continuity in their understanding or explanation of 'conservation' in regards to the Broads. I find this alarming because the term 'conservation' appears to be widely used in regard to the Broads in general and planning in particular.

For example, in regard to Thorpe Island, and Jenner's Basin in particular, we are told that this that and the other can't take place because it is a 'conservation' area. I have asked and have either received shallow bluster or no answer at all as to what is being conserved and why, seemingly no one is actually prepared to commit themselves.

The mooring basin is a fact of history, however, does conservation mean turning the clock back to an unspecified time in the Island's history before the basin was dug? Or allowing the basin to silt up and turning it into something that it never was, for example, wetland for wading birds? I have to say that I don't see that as conservation, rather it would mean destroying rather than conserving.

However, on the other hand, it does seem that the Authority is quite prepared to pick and choose which of its policies to uphold, such as at the Waveney River Centre. Please be aware that I was a director of the company that dug the marina there and am well aware of the policies that were put in place to protect visitor moorings. In fairness I am totally in support of the recent decision, it does show that the Authority is prepared to ignore its own policies, when it suits, but if it can do that on one occasion then it should be prepared to do the same elsewhere, especially when both justice and common sense demands it, such as at Jenner's and Oulton Broad's North Bay.

The North Bay of Oulton Broad has a number of 'big houses', one of which I grew up in and now live next door to. Lucky us, we live in a conservation area, the 'big gardens' of the 'big houses' have to be maintained! A policy that is far too late as most of the 'big houses' have either had extensive development, such as at North Bay House and Broadlands, both residential homes for the elderly, or had further homes built in their gardens. Indeed I think that Chingle Staithe is actually the only 'big house' in the North Bay area that has never had any form of infill or development.

I must admit to some bitterness when I relate to my own plans to build a retirement bungalow in my own garden at 31 Romany Road. The decision was unrealistic, grossly unfair, totally unreasonable and totally unrelated to adjacent planning policies, in a nutshell it was wholly and morally unjust. It would have had nil effect on the visual amenity, it was a travesty of moral justice. My wife and I had worked hard towards our retirement, thwarted by, well, I best not write what I really think. Upholding poor policy, like poor law, devalues the system.

Conservation policies are fine, if anyone can actually define the true meaning and intent of the word in relation to The Broads. These policies have to be rational and just, e.g. Jenners and Oulton Broad's North Bay. The Broads is an ongoing environment, attempting to turn the clock back is rarely an option, especially when there is no defined point in time to aim for. Policies need to reflect the ongoing nature of the Broads and the communities within. Planning blights, such as in the North Bay, long after the horse has bolted from the stable, and especially when the impact on the visual amenity is, to all intents and purposes, at least nil and arguably positive, have to be questioned. This is especially so when one considers the inconsistency of planning policies and decisions across Broadland. Despite the industry awards for the redevelopment at Hunsett Mill it was, nevertheless, an unpopular and arguably ill considered consent that has since destroyed an iconic Broads vista.

The time has surely come for a thorough revision of planning policies for the Broads. These policies have to be just and in keeping with local communities. Conservation areas need reviewing, indeed the very definition of conservation needs reviewing. Thorpe Island has long been a boating area, why destroy what is already there, and has been for a long time? This does bring into question the whole ethos of Broads planning. Conserve the Broads as themselves, by all means, but destroying their ways and identity should not be an option.

If you have a copy of the Countryside Commission's report on Broadland to hand, it advocates the creation of The Broads National Park, you might notice the name of Robert Waller as a consultee, he was my father. In other words I am well aware of the issues and history of The Broads in this regard. In that report it was seen as desirable that in being a national park it should be for people. We should not forget that, people, their plans and aspirations matter.

The Authority is seen by many as being officer rather than member led. It is time for members to take back control in my opinion, especially in regards to planning.

The Broads is a unique member of the National Park's family. We should all remember that and work hard towards maintaining that very desirable trait. The Broads is the Broads, a very special place. However, it is not a national park.

Regards, Peter Waller

Respondent: Waveney District Council

**Lottie Carlton**

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**From:** Natalie Beal  
**Sent:** 14 April 2016 16:36  
**To:** Lottie Carlton  
**Subject:** FW: WDC Response to BA Issues and Options Consultation

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**From:** Jack Green [REDACTED]  
**Sent:** 14 April 2016 15:47  
**To:** Natalie Beal  
**Subject:** WDC Response to BA Issues and Options Consultation

Good afternoon Natalie

Apologies for the delay providing comments on the Issues and Options Consultation. Please find comments from Waveney Planning Policy below.

Waveney District Council welcomes the opportunity to comment on the Broads Authority Local Plan: Issues and Options Consultation.

It is considered the consultation puts forward a variety of issues and potential approaches that will help inform the next steps in the preparation of the Local Plan.

Waveney District Council is in the early stages of reviewing its own existing Local Plan. The Council anticipates making the 'Options for the new Waveney Local Plan' document available for public comment in April 2016. With both the Broads Authority and Waveney District Council moving forward with their respective Local Plans opportunities will exist to ensure the Plans work together.

Section 4.11 (Neighbourhood Plans): Bungay is currently preparing a Neighbourhood Plan. The area designation has recently been consulted upon. Following this, the Neighbourhood Plan area been approved by both Waveney District Council and the Broads Authority.

Section 19 (Retail): The document identifies the Bridge Road shopping area in Oulton Broad as a district shopping centre. With both the Waveney Local Plan and Broads Local Plan being reviewed at the same time there is an opportunity to ensure a consistent approach is delivered to protect the wider shopping area which straddles both sides of Bridge Road. While it is a single shopping area it is split between two planning authorities.

Section 26 (Sport and Recreation Venues): For further background information, a variety of sports facilities are located at Beccles Common which is adjacent the Broads Authority administrative area including football, rugby, cricket, tennis, bowls and golf alongside other recreational types of open space.

This is a planning officer response and will not prejudice any comments submitted in response to future consultations. We look forward to the next steps in the preparation of the Broads Authority Local Plan.

Regards  
Jack

Jack Green  
Planning Officer (Waveney)  
Planning Policy and Delivery Team