

Policy x: Residential Development within Defined Development Boundaries

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

Development will be of a scale that is suitable and appropriate for the size of the site and settlement. Proposals need to avoid over development and retain and reflect the character of the area.

Outside the defined development boundaries, new residential development will not be permitted except in the circumstances defined in Policies xxxx.

Proposals for new residential moorings will be determined against Policy xxx.

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

- Horning
- Oulton Broad

In the light of the potential for archaeological remains in the area an archaeological survey may be required in advance of any grant of planning permission.

- Thorpe St Andrew
- Wroxham and Hoveton

Outside the designated village centre area retail uses will not be acceptable, in order to secure the continued viability and vibrancy of retailing in the village centre, and limit the spread of traffic congestion (see Policy xx). Particular care will be taken to avoid uses which may generate excessive traffic on the minor roads of the area or in the village centre/bridge area, and to secure the retention of boatyard uses and related employment land.

CONSTRAINTS & FEATURES

- **Horning**

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

Conservation area.

Listed buildings.

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

- **Oulton Broad**

Area is within Oulton Broads Conservation Area.

High potential for archaeological remains in the area.

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

- **Thorpe St Andrew**

Area is within Thorpe St. Andrew Conservation Area.

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

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

- **Wroxham and Hoveton**

Close to SPA and SAC.

Lies partly within Wroxham Conservation Area.

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

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

Capacity of minor roads in the area.

#### Reasoned Justification

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

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

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

The areas with development boundaries are rolled forward from the 2014 Local Plan. To support the Authority's approach a Development Boundaries Topic Paper<sup>1</sup> and Settlement Study<sup>2</sup> have been produced. This work assesses the suitability of settlements for Development Boundaries and seeks to justify why the four areas (Horning, Oulton Broad, Thorpe St Andrew and Wroxham and Hoveton) have Development boundaries.

Development boundaries are also important for residential moorings. One of the key criteria of policy XX relates to the mooring being within or adjacent to a development boundary. The Authority also regards other areas as being suitable for residential moorings which do not have development boundaries. These are in Brundall (policy x), Horning (policy x), and Stalham (policy x). The areas

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<sup>1</sup> xxx

<sup>2</sup> [http://www.broads-authority.gov.uk/data/assets/pdf\\_file/0006/764475/Broads-Authority-Settlement-Study-no-hierarchy-in.pdf](http://www.broads-authority.gov.uk/data/assets/pdf_file/0006/764475/Broads-Authority-Settlement-Study-no-hierarchy-in.pdf)

covered by these policies are not deemed suitable for development boundaries to reflect constraints on the land, but are still accessible to services and facilities that make them suitable for residential moorings.

Some development proposals could be acceptable outside of Development Boundaries although this will depend on detail, constraints in the area and accordance with other adopted policies and the NPPF. See policies xxxxx

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

In most cases settlements in the Broads straddle the Broads boundary, and the greater part of the settlement lies within the neighbouring local planning authority's jurisdiction. Because of the national protection afforded to the Broads and the vulnerability to flooding of most of the Broads area (the boundary generally follows the edge of the flood plain) it will usually be the case that both the greatest need and greatest opportunity for development in any settlement straddling the boundary will be in that part of it outside the Broads. In assessing each of such settlements for Broads development boundaries, regard has been given to the treatment of the adjacent area by its local planning authority and although this is not considered determinative, it is a relevant consideration. In each case the approach to the settlement is complementary to the treatment of the adjacent area of the settlement outside the designated Broads area

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

Regarding the development boundary for **Hoveton and Wroxham**, this combined area is one of the largest concentrations of development, population and services in the Broads. It has a range of shopping, employment opportunities, leisure and health facilities, etc., and relatively frequent rail and bus services. Although there is little undeveloped land (aside from gardens and public spaces) there has long been a gradual renewal and replacement of buildings and uses within the area, and there are at present a limited number of derelict or underused sites ripe for redevelopment. The development boundary excludes areas identified as open space, and includes boatyards and other

development on the south (Wroxham) bank. It also complements the Village Core policy (xxx) to continue the focus of retail and related development in the village centre. Parts of the area are at risk of flooding. The relevant Local Plan and National Planning Policy Framework Policies will apply, and a site flood risk assessment may be required to establish the degree of risk.

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

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

**Specific questions relating to the Development Boundary policy:**

The previous version of this policy (DP22) stated that development within development boundaries would normally be limited to no more than 5 dwellings and only more than 5 dwellings in exceptional circumstances.

It is not intended to carry forward this threshold. Instead, the policy emphasises the onus on the developer to prove that their scheme is suitable and appropriate for size of site and in relation to other policies in the Local Plan. Proposals need to avoid over development and retain and reflect the character of the area.

**Q: What are your thoughts on the removal of the 5 dwelling threshold?**

We are aware that some of the area included within the development boundaries is at risk of flooding. This has the potential to raise false hope to those wishing to develop within development boundaries who could be turned down in relation to flood risk.

We propose to keep the development boundaries as shown on the draft policies maps (xxx) but display the Environment Agency Flood Risk zones on these maps. Flood risk is also emphasised within the reasoned justification for each settlement with a development boundary. Furthermore, development boundaries are also of relevance to other land uses, not just dwelling houses. For example development boundaries are of relevance to residential moorings.

**Q: What are your thoughts on the development boundary and flood risk issue?**

Alternative Options

**Additional Development Boundaries.** In general, many settlements were assessed in relation to the services and facilities on offer and this is set out in the Settlement Study.

One area which was being considered as having a development boundary was Stalham Staithe. This area generally scored well in the Settlement Study. This scoring however relies on the ability to cross the A149 using the pedestrian refuge as many facilities and services are fairly close to the Staithe area once the A149 is crossed. Regarding the pedestrian refuge, the following organisations were contacted:

- Local businesses operating in the staithe: Consider the route important for visitors to the staithe area to visit the town. The refuge could be improved. The time taken to get to the town centre could be around 12 minutes or so.
- Norfolk County Council Highways initial opinion: refuge appears to be well used and there have been no reports incidents at the refuge in the last five years (although the absence of such accidents does not necessarily indicate a route is safe). Whilst Staithe road is suitable for two way traffic in peak tourist season, the pressure for tourist parking could restrict its width. The other roads are all primarily single track lanes with little or no passing provision and not ideally suited to any material increase in traffic movements.
- Parish Council – The pedestrian routes between the refuge and the staithe and to the town are both very well used particularly in the summer months with more visitors to the Broads. Consider that the routes need to be improved to make more obvious to drivers on the A149 and to pedestrians who could use it.

Another consideration is the impact of development in the area on the character of the staithe. The Conservation Area Re-Appraisal is to be adopted by the end of the summer. Reflecting the work undertaken in relation to the re-appraisal:

- It is not clear where new development would go as the staithe area has seen much infill development
- The mixed land uses are part of the character.
- Community consider the area is at capacity and there is likely to be opposition to a development boundary in the area.

On balance, whilst the services and facilities in Stalham can be accessed by pedestrians using the pedestrian refuge, further development in the area has the potential to negatively impact the character of the area and also the highway network. As such, a development boundary for the Stalham Staithe area is not proposed to be taken forward.

**Employment sites directed to development boundaries:** An option considered during the Issues and Options consultation was to reinstate the 1997 Local Plan approach of development boundaries applying to residential and employment land uses. On reflection it was felt that this could stifle economy. There would likely be lots of exceptions e.g. boatyards and tourism development. The areas where the development boundaries are chosen are not necessarily appropriate for employment.

Comments received as part of the Issues and Options:

**Norfolk County Council:** 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.

**Evolution Town Planning:** 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'. 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. 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. 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.

**Broadland District Council:** This section describes the purpose of a development boundary to 'consolidate development around existing 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.

**Great Yarmouth Borough Council:** 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.

**Resident:** 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 scan 2 shaded blue to be included in the Local Plan as a development area, as it was before the Broads Authority took over this area.

Sustainability Appraisal Summary

Evidence used to inform this section

Broads Settlement Study: [http://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0006/764475/Broads-Authority-Settlement-Study-no-hierarchy-in.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/764475/Broads-Authority-Settlement-Study-no-hierarchy-in.pdf)

Development Boundary Topic Paper:

Monitoring Indicators

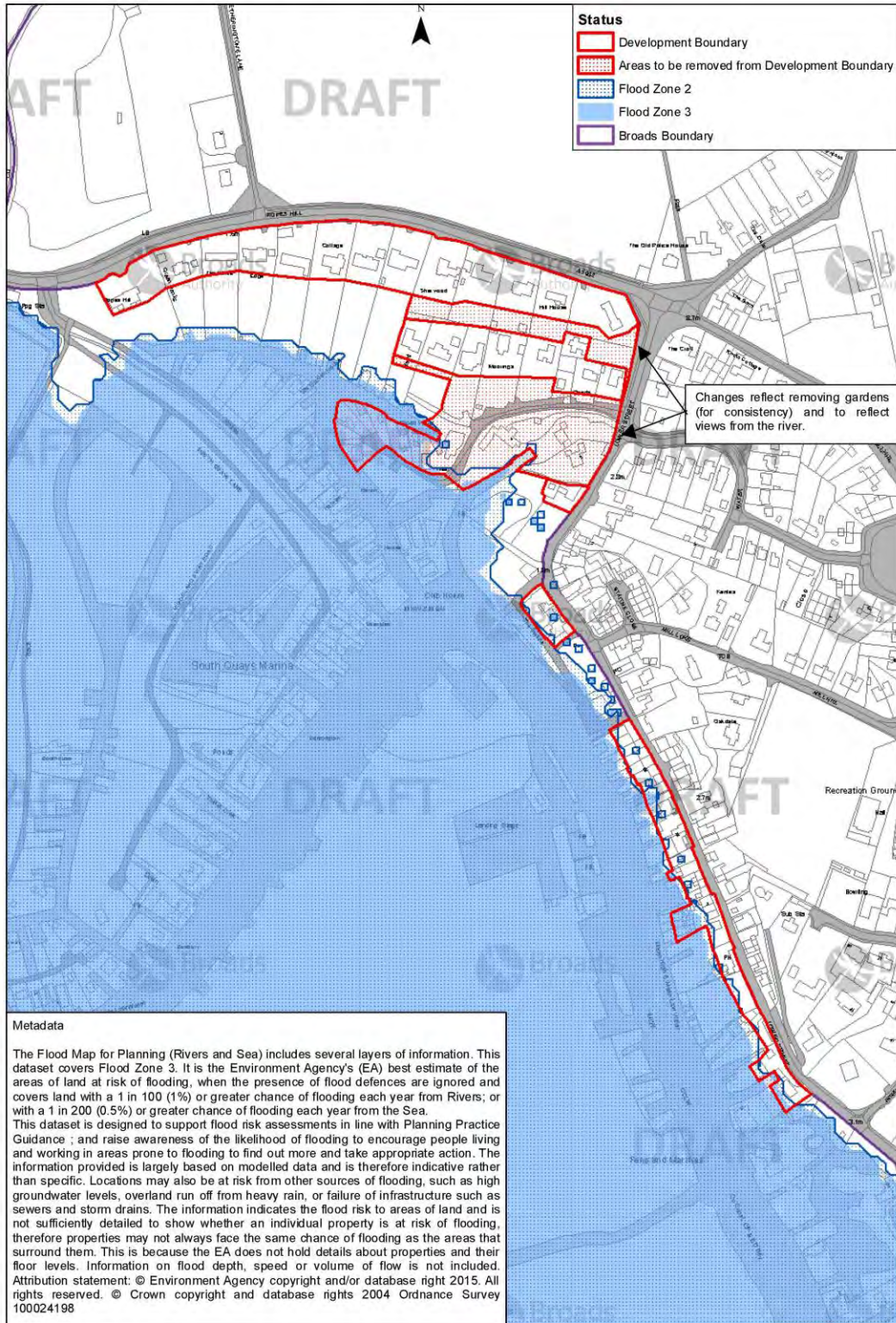
MONITORING INDICATOR

Development is within Development Boundaries.

LIKELY INFORMATION SOURCES NOTES

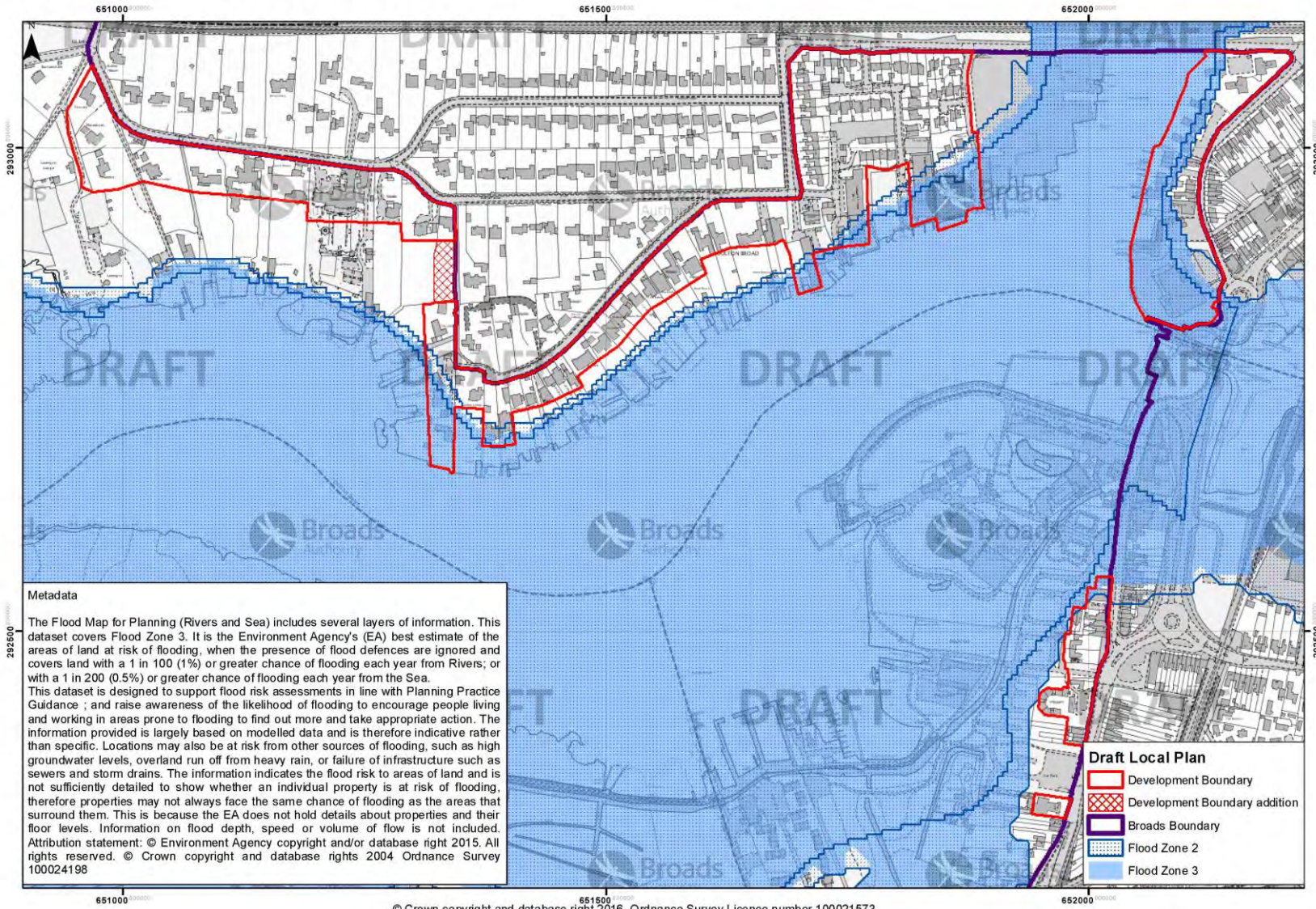
Planning Records

**HORNING DEVELOPMENT BOUNDARY**



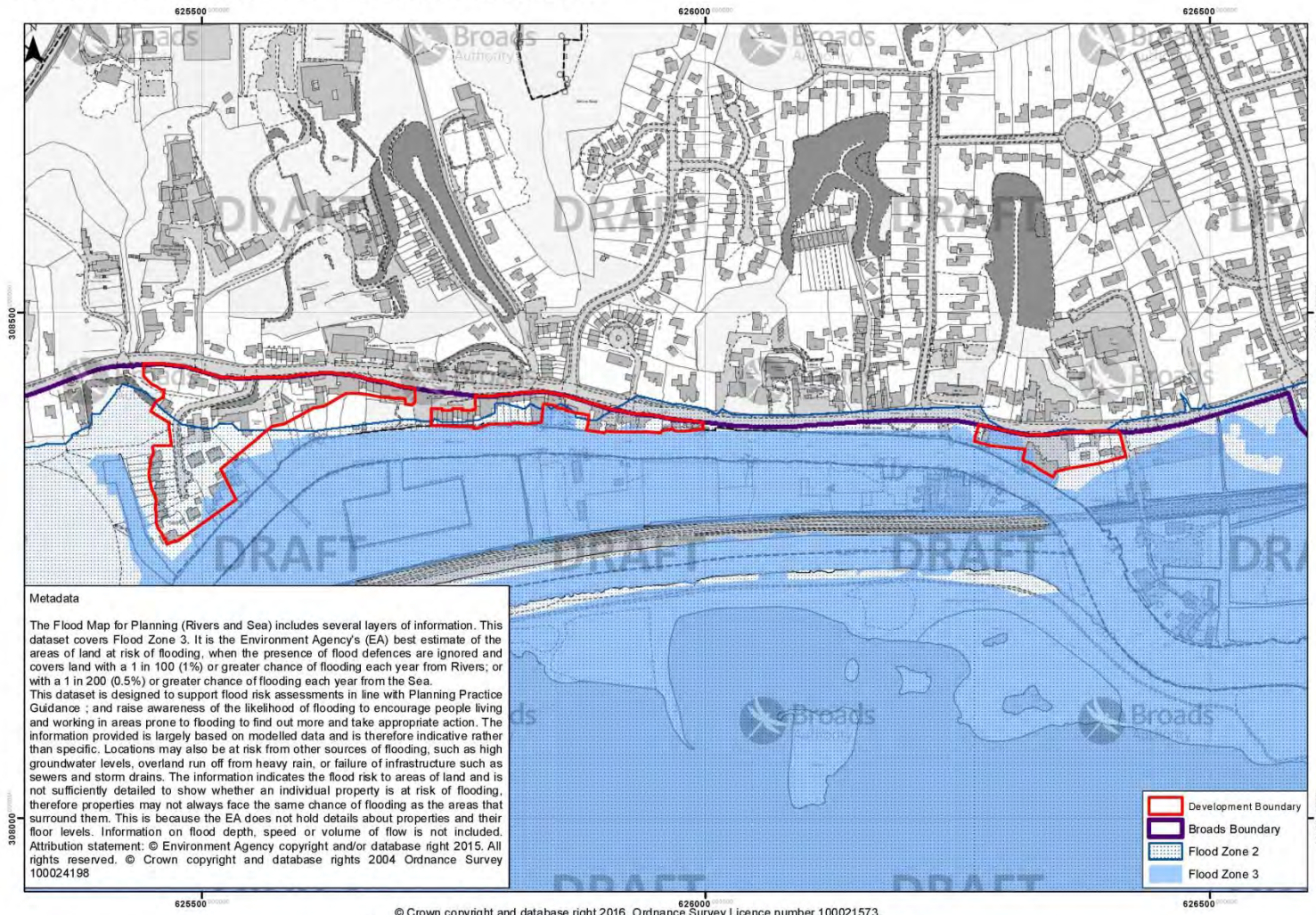


OULTON DEVELOPMENT BOUNDARY



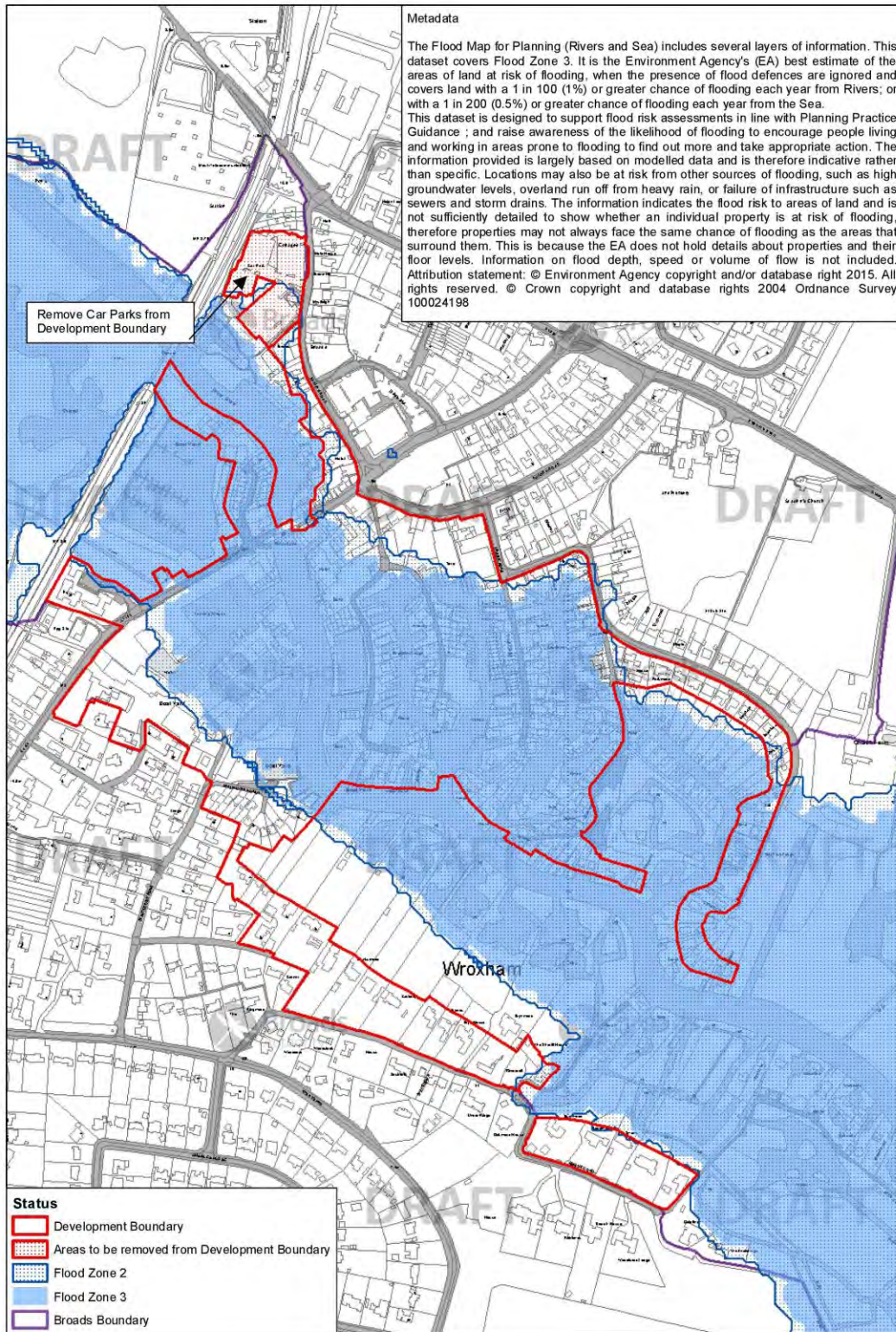
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 You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.  
 The Broads Authority Boundary dataset is a representation indicating the location of the executive boundary at 1:10000. The definitive paper map is held by the Broads Authority which shows the legal boundary at 1:10000.

THORPE ST ANDREW DEVELOPMENT BOUNDARY



The Broads Authority Boundary dataset is a representation indicating the location of the executive boundary at 1:10000. The definitive paper map is held by the Broads Authority which shows the legal boundary at 1:10000.

**WROXHAM DEVELOPMENT BOUNDARY**



## Please note – not adopted policy.

### APPENDIX B

### Proposed changes to the Adopted Core Strategy Policies Planning Committee September 2016

Policy	Summary of policy changes
DP1	Rolled forward with some amendments. Discussed at August Planning Committee
DP2	Rolled forward with some amendments. Discussed at August Planning Committee
DP3	Rolled forward with some amendments. Discussed at August Planning Committee
DP4	Rolled forward with some amendments. Discussed at August Planning Committee
DP5	Rolled forward with some amendments. Discussed at August Planning Committee
DP6	Rolled forward with some amendments. Discussed at August Planning Committee
DP7	Rolled forward with some amendments. Discussed at August Planning Committee
DP8	Rolled forward with no amendments. Discussed at August Planning Committee
DP9	Rolled forward with some amendments. Discussed at July Planning Committee. Now called Utilities Infrastructure.
<a href="#">DP10</a>	Rolled forward with some amendments.
<a href="#">DP11</a>	Rolled forward with some amendments.
<a href="#">DP12</a>	Rolled forward with some amendments.
<a href="#">DP13</a>	Rolled forward with some amendments.
DP14	Rolled forward with some amendments. See Tourism document (for September Planning Committee)
DP15	Rolled forward with some amendments. See Tourism document (for September Planning Committee)
<a href="#">DP16</a>	Rolled forward with some amendments.
<a href="#">DP17</a>	Rolled forward with some amendments.
DP18	Will be assessed following employment study completion.
DP19	Will be assessed following employment study completion.
DP20	Will be assessed following employment study completion.
DP21	Rolled forward with some amendments. Discussed at August Planning Committee
DP22	Combined with other development boundary policies. Discussed at May Planning Committee
DP23	Rolled forward with some amendments. In a separate document. (for September Planning Committee)
<a href="#">DP24</a>	Rolled forward with some amendments.
DP25	Rolled forward with some amendments. In a separate document. (for September Planning Committee)
DP26	Rolled forward with some amendments. Discussed at May Planning Committee.
DP27	Rolled forward and improved and combined with CS25. Discussed at July Planning Committee.
DP28	Rolled forward with some amendments. Discussed at June Planning Committee
DP29	Rolled forward with some amendments. See separate flood document.
DP30	Rolled forward with some amendments. Discussed at August Planning Committee

**Please note that these are suggested amendments to the adopted Development Management policies as the new Local Plan is produced. The current adopted policies are in place and are not amended. Any changes will come into force when the new Local Plan is adopted.**

## Please note – not adopted policy.

### Policy x: Advertisements and Signs

Advertisements and signs should be sensitively designed and located having regard to the character of the building/structure on which they are to be displayed and/or the general characteristics of the locality.

Advertisements will only be permitted where the size, design, positioning, materials and degree of illumination of the advertisement would not have an adverse visual impact on the built or landscape character of the Broads or a detrimental effect on public safety on land or water.

The number of advertisements shall be kept to a minimum and amalgamated with existing signage. Cumulative impact in relation to other signage in the vicinity will also be an important consideration.

Particular regard should be had to any impact of proposals on conservation areas and the historic character of the frontage. Proposals which obscure features of architectural or historical interest, or are uncharacteristic of a building's design, will not be permitted.

Where an advertisement would have an unacceptable adverse impact on the special qualities of the Broads it will be refused.

### Reasoned Justification

The Authority recognises that advertisements provide businesses with an important means of attracting customers and can play an important role in informing visitors to the Broads and supporting visitor trade. Nevertheless, by their very nature advertisements are designed to attract attention and are frequently displayed in prominent positions. The impact of advertisements and signs on the character and appearance of buildings, settlements and the landscape can, as a result, be significant. Illuminated advertisements can have a particularly significant visual impact and detract from the tranquillity of the Broads.

The Authority will therefore carefully consider proposals for advertisements to ensure that they are sympathetic to the special character of the Broads and do not have an unacceptable impact on public safety on land and water. The design of an advertisement, together with its size, positioning and materials, can determine how well it fits into or stands out from the surrounding area. To reduce unnecessary visual intrusion, the number of advertisements will be kept to a minimum and, ~~wherever possible,~~ an advertisement or sign should complement existing architecture and the local context.

Some types of advertisement are exempted from detailed control, and other specific categories do not require express consent from the Local Planning Authority and instead qualify for 'deemed consent' provided they conform to stated conditions and limitations for each category. Further information on advertisement control can be found in the [Town and Country Planning \(Control of Advertisements\) \(England\) Regulations 2007 and Communities and Local Government Circular 03/2007-NPPG<sup>1</sup>](#).

Please note that the entire area of the Broads is an area of Special Advert Control<sup>2</sup>. An area of special control order places additional restrictions on the display of advertisements.

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<sup>1</sup> <http://planningguidance.communities.gov.uk/blog/guidance/advertisements/>

<sup>2</sup> [http://planningguidance.communities.gov.uk/blog/guidance/advertisements/additional-restrictions-on-the-display-of-advertisements/#paragraph\\_055](http://planningguidance.communities.gov.uk/blog/guidance/advertisements/additional-restrictions-on-the-display-of-advertisements/#paragraph_055)

## Please note – not adopted policy.

### Policy x: ~~Access on Land~~ Transport, highways and access

Development proposals that need to be accessed by land shall:

- a) Be assessed in terms of their impact upon the highway network in respect of traffic capacity, highway safety and environmental impact of generated traffic. As appropriate, mitigation will be required including off-site works, points of access, visibility and turning facilities;
- b) Incorporate opportunities for increased sustainable public access by a choice of transport modes including by bus, train, foot, bicycle or horse, including where possible new access to CROW access land;
- c) Provide parking in accordance with the relevant adopted standards;
- d) Where appropriate, be accompanied by a Travel Plan that seeks to improve the accessibility of the developments by non-car modes, the implementation of which will be secured by planning condition or obligation; and
- e) Avoid any adverse effect on protected species or habitat.

When determining development proposals, the Authority will safeguard public rights of way and ensure that future routes are not compromised. Development will not be acceptable where it would result in the severance or loss of an existing public route.

New development adjacent to a waterway ~~should~~ shall, where appropriate, facilitate pedestrian access to, and along, the waterway by providing a safe and attractive waterside walkway and pedestrian links between the waterside and other key pedestrian routes.

### Reasoned Justification

A number of major transportation links, including the A47 trunk road east of Norwich and the A12 south of Great Yarmouth, traverse the Broads. Nevertheless, as a predominantly rural area, access to the villages, rivers and broads is usually via minor roads, which places a constraint on the development of isolated sites. Consequently, in order to maintain the tranquillity and special character of the Broads, the Authority will expect new development to be of a scale and nature appropriate to the adjacent road network and the character of the area. Where a development proposal could have an impact on a trunk road, it will be assessed by the Highways Agency in accordance with policies of the relevant DfT Circular (currently 02/20072013: THE STRATEGIC ROAD NETWORK AND THE DELIVERY OF SUSTAINABLE DEVELOPMENT Planning and the Strategic Road Network).

Traffic congestion is a problem in parts of the Broads, particularly in and around the towns that act as a focus for attractions and which provide easy access to the rivers or broads. This congestion creates a negative impression of the Broads, both to visitors and residents, and can have a damaging impact on the local economy. Consequently, to minimise the impact of new development on congestion, proposals should incorporate measures that enable the development to be accessed by a choice of means of transport and provide adequate levels of parking. as defined by the appropriate County Council. Discussions will be had with the relevant district and relevant county council with regards to which parking standards to apply (as some districts have their own parking standards).

A Travel Plan should also be submitted as part of any planning application where the proposed development has significant transport implications. This should illustrate the accessibility of the site by all modes of transport, indicate the probable modal split of journeys to and from the site and provide details of any proposed measures to improve access to the site by public transport, walking and cycling. Further guidance is available in the Department for Transport's Good Practice Guidelines: Delivering Travel Plans

## Please note – not adopted policy.

~~through the Planning System, and from Norfolk County Council, NPPG<sup>3</sup> and from Norfolk<sup>4</sup> and Suffolk<sup>5</sup> County Councils.~~

Public Rights of Way provide opportunities to encourage walking, cycling and horse riding as safe and attractive modes of transport within the Broads, whether for recreational or other purposes. As valuable transport infrastructure, the Authority will therefore afford them protection from development that is likely to prejudice their current or future use. In the context of the policy, Rights of Way include CROW access land, bridleways, cycle ways, permissive paths, byways (and restricted byways) and roads used as public paths and footpaths. ~~The policy also seeks to safeguard potential future routes from development (and identifies some particular future potential routes in policy x and x)~~

Improving and enhancing public access to the waterways is a key objective for the Broads Authority. New development adjacent to the waterway will be expected to facilitate pedestrian access to, and along, the waterway, secured by legal obligation where required. This will be particularly appropriate in the case of new residential, commercial and tourism related developments. Extensions and changes of use of existing development may present opportunities to secure enhanced public access, although this will be negotiated on a case-by-case basis dependent on the nature of the site and the network of public access adjoining the site.

If a proposal is likely to result in increased vehicular movements and associated emissions that have the potential to affect an internationally designated site, it will need to be considered in accordance with the Conservation of Habitats and Species Regulations 2010 (the Habitats Directive) and a project level Appropriate Assessment undertaken. Development that could affect the integrity of a European site would not be in accordance with Policy ~~CS2 of the Core Strategy.x of the Local Plan.~~

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<sup>3</sup> ~~<http://planningguidance.communities.gov.uk/blog/guidance/travel-plans-transport-assessments-and-statements-in-decision-taking/overarching-principles-on-travel-plans-transport-assessments-and-statements/> and <http://planningguidance.communities.gov.uk/blog/guidance/travel-plans-transport-assessments-and-statements-in-decision-taking/travel-plans/>~~

<sup>4</sup> ~~<https://www.norfolk.gov.uk/roads-and-transport/alternative-ways-to-travel/travel-plans>~~

<sup>5</sup> ~~<https://www.suffolk.gov.uk/planning-and-environment/planning-and-development-advice/travel-plans-for-new-developments/>~~

## Please note – not adopted policy.

### Policy x: Access to the Water

Developments that support and encourage the use of waterways, including the provision of supporting infrastructure for navigation, such as the construction of jetties and walkways and the provision of electric hook up points, will be permitted provided that they:

- a) Would not adversely impact navigation
- b) Would not result in hazardous boat movements;
- c) Would not compromise opportunities for access to, and along, the waterside, access to and use of staites, or for waterway restoration; and
- d) Are consistent with the objectives of protecting and conserving the Broads landscape and ecology, including the objectives of the Water Framework Directive;
- e) Would not prejudice the current or future use of adjoining land or buildings.

Proposals incorporating staites or slipways will be permitted where:

- f) The use of the slipway and any associated uses or facilities, including car parking, would not have an adverse effect on either the waterway or the adjacent riverside, including ecological, biodiversity or flood risk effects; and
- g) Access and other highway requirements for cars and trailers would be adequately provided for (in line with policy x).

Development proposals for new freight wharves and for the provision of freight interchange on brownfield sites adjacent to the navigation will be permitted where these are in accordance with the Core Strategy and other policies of the Development Local Plan.

### Reasoned Justification

The Broads is one of the most extensive and varied inland waterway systems in the UK, offering 200km of boating on lock-free tidal rivers, approximately 1,974 hectares of water space and 63 permanently open water bodies. A key objective underlying the designation of the Broads is to protect the interests of navigation and to maintain the navigation area for the purposes of navigation to such standards as it requires. Closely aligned to this is the Authority's responsibility to enable people to enjoy the Broads. To this end, the Government has stated that it expects the Authority to continue to encourage a greater range of people to take up sailing, canoeing and fishing and other water related activities<sup>6</sup>.

Accordingly, development proposals that support and encourage the use of waterways will be permitted where they would not have a detrimental impact on public safety on land or water or an unacceptable impact on other people's enjoyment of the Broads. Proposals should also be consistent with the objectives of the Water Framework Directive and with protecting and conserving the Broads landscape and wildlife. In particular, if a proposal is considered likely to have an effect on internationally designated sites, it will need to be considered in accordance with the Conservation of Habitats and Species Regulations 2010 (The Habitats Directive) and a project level Appropriate Assessment undertaken. Development that could affect the integrity of a European site would not be in accordance with Policy CS2 of the Core Strategy x of the Local Plan.

The waterways of the Broads have the potential to provide a sustainable and efficient mode of transporting freight. However, it is important to ensure that the use of waterways for this purpose does not affect the special qualities of the Broads. Consequently, proposals for infrastructure to support the greater use of the waterways by freight will be permitted provided that they do not have an adverse impact on landscape character, biodiversity, tranquillity or other people's enjoyment of the Broads.

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<sup>1</sup> English National Parks and the Broads: UK Government Vision and Circular (2010) – Defra



## Please note – not adopted policy.

### Policy x: ~~Bank Protection~~ Riverbank stabilisation

Development proposals that include ~~bank protection~~ riverbank stabilisation will be permitted where the need can be fully justified and it can be demonstrated through the submission of the Riverbank stabilisation Checklist for Design that the proposal has been designed to take account of:

- ~~a) The need for protection;~~
- ~~b)a) The nature of the watercourse;~~
- ~~c)b) The scale of tidal range;~~
- ~~d)c) Safe navigation;~~
- d) The character of the location;
- e) Existing uses in the area;
- e)f) Future maintenance of the riverbank stabilisation method proposed;
- ~~f)g) The effect on European and priority biodiversity habitats and species; and~~
- ~~g)h) The requirements of the Water Framework Directive.~~

Soft engineering techniques ~~should~~ shall be used as a first preference where appropriate.

Permission for the piling of banks will only be permitted where:

- ~~h)i) There is a proven need to prevent bank erosion by this method; or~~
- ~~i)j) The site is within an established settlement where piling is part of the character of the area; or~~
- ~~j)k) The proposal is for replacement piling for a site that has been piled in the recent past and where soft engineering techniques are unlikely to provide adequate protection.?~~
- ~~k)l) The piling works are required for:~~
  - i) navigation purposes;
  - ii) compliance with the Water Framework Directive;
  - iii) the prevention of diffuse pollution to the water environment; or
  - iv) flood defence; ~~or,~~
  - v) ~~development that has been granted planning permission.~~

Mooring on banks that have been piled may not necessarily be permitted. Where mooring is permitted, the number of craft allowed and whether stern-on or single alongside only mooring, will be specified.

### Reasoned Justification

By leading to an enhanced rate of soil loss from river banks, erosion can have a significant impact on the appearance and ecological value of the waterways in the Broads. Bank erosion can also add to the reduction of water quality and loss of open water, and release nutrients into the waterways of the Broads. Bank erosion is also expensive to repair and the sediment that enters watercourses increases the amount and frequency of dredging required to maintain adequate water depths for navigation. The careful design of new or replacement bank edging is therefore crucial for protecting the special landscape character and conservation value of Broads habitats and for maintaining the navigation area to the required standard.

The wide variation in depth, width, boating activity, tidal ranges and bank construction on different river sections in the Broads mean that no one ~~bank protection~~ riverbank stabilisation solution will be suitable for the whole area. The appropriate technique will also depend on the objective behind the bank protection. To help design proposals for riverbank stabilisation, the Authority has produced, consulted on and adopted guidance and design checklist<sup>7</sup>. Accordingly, development proposals that include ~~bank protection~~ riverbank stabilisation ~~should need to~~ be accompanied by a statement-completed Riverbank stabilisation Checklist for Design that provides justification for the choice of bank protection solution in relation to the issues listed in the policy and guidance.

<sup>7</sup> <http://www.broads-authority.gov.uk/planning/Planning-permission/design-guides/river-bank-stabilisation>

## Please note – not adopted policy.

Traditionally, riverbanks in the Broads have been protected using timber or steel piling driven into the riverbed at the bank edge. However, this approach can damage riverbank habitats, adversely affect protected species, encourage boat mooring in inappropriate locations and create an urban feel in an otherwise rural area. In many parts of the Broads, particularly those with an open rural location, natural or ~~soft~~ less intrusive engineering techniques such as alder poles, faggots, willow spilling, biodegradable geotextiles and vegetation will represent a more visually and ecologically appropriate solution that should be used in preference to piling where technically feasible. Accordingly, the Authority will ensure that the piling of banks only takes place where there is a demonstrable need to prevent bank erosion by this means, where it is appropriate to the local character of the area or for the use of the frontage for mooring. If a proposal is considered in the context of ~~Policy DP13~~ this policy to potentially have an effect on an internationally designated site then it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.

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## Please note – not adopted policy.

### Policy x: Moorings, mooring basins and marinas.

In accordance with the Mooring Strategy (2009), Integrated Access Strategy 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 and, marinas, including or reconfigured mooring basins-changes to existing provision will be permitted where it can be demonstrated through the submission of a Bank Stabilisation Pre-application Questionnaire<sup>8</sup> that the proposal has been designed to take account of:

- a) The nature of the watercourse;
- b) The scale of tidal range;
- c) The character of the location;
- d) Existing uses in the area;
- e) Future maintenance of the mooring method proposed;
- f) The effect on European and priority biodiversity habitats and species; and
- g) The requirements of the Water Framework Directive

#### Other important considerations include:

- h) They would be located where they or their use would not have a negative impact on navigation (for example in an off-river basin or within a boat yard);
- i) ~~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;~~
- j) There is provision for an adequate and appropriate range of services and ancillary facilities, or adequate access to local facilities in the vicinity;
- k) The proposed development would not prejudice the current or future use of adjoining land or buildings; and
- l) The proposed development would not adversely affect the amenity of adjoining residents.

In addition, proposals for development at or within commercial mooring basins or marinas<sup>9</sup> should:

- a) Not result in the loss of moorings available for visitor/short stay use;
- b) Not have an adverse effect on European habitats or species and meet the requirements of the Water Framework Directive;
- c) Provide new ~~visitor (short stay)~~ short stay moorings (visitor, tidal, de-masting as appropriate) at not less than 10% of total new moorings provided with a minimum provision of two provided at nil cost to the Broads Authority; These moorings shall be provided on-site but in exceptional circumstances the Authority may consider off-site contributions to any type of mooring.
- d) Make adequate provision for car parking, waste and sewage disposal and the prevention of pollution;
- e) Provide for the installation of pump-out facilities (where on mains sewer) unless there are adequate alternative facilities in the vicinity; and
- f) Provide an appropriate range of services and ancillary features, unless there is access to local facilities within walking distance.

The Authority supports the provision of electric hook up points where appropriate, subject to the impacts associated with their construction and operation not being unacceptable (for example illumination and location of electricity supply).

~~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.~~

<sup>8</sup> [http://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0010/703882/Mooring-design-Pre-application-questionnaire.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0010/703882/Mooring-design-Pre-application-questionnaire.pdf)

<sup>9</sup> Please note that we are looking into a definition for these terms.

## Please note – not adopted policy.

(Note: Refer to <http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/water-supply-wastewater-and-water-quality-considerations-for-planning-applications/> for information on pollution prevention measures)

### Reasoned Justification

This policy applies to private and public moorings. In the Broads, mooring types traditionally fall under the following definitions:

- **Private Moorings:** A mooring that comprises the usual base for a vessel from which it might or might not go cruising. This type of mooring will often be allocated to or occupied by a single, identifiable vessel. There is no 'residential use'. A charge is usually made for the use of a private mooring.
- **Visitor/Short Stay Moorings:** A mooring that is specifically designated to enable boats to stop-off or stay for short periods while cruising, usually for a maximum, specified period. This type of mooring is usually occupied by different visiting vessels in succession (not necessarily continuously). A charge may or may not be made for the use of visitor/short stay mooring.
- **Casual/Informal Moorings:** A mooring where boats moor on a casual basis, anywhere along a river bank, for a short period of time. These do not generally require the benefit of planning permission.
- **Commercial Moorings:** A mooring (usually in a mooring basin or marina) used by a commercial operator on a commercial basis, where boats may be moored for long or short periods between cruising. The vessels may or may not be in the ownership of the commercial operator.
- Tidal moorings: Used to moor a vessel to whilst waiting for the correct state of tide to proceed with the journey. These could be near to bridges for example. They do not have to have access to the land.
- De-masting moorings: Used to moor a vessel to in order to lower the mast to enable the vessel to continue with the journey. Likely to be near bridges where the air draught (height between water and bridge) means the mast must be lowered. Again, these do not have to access land.

(Note: Residential Moorings are addressed separately under Policy ~~DP25x~~)

The provision of a network of moorings throughout the Broads system is essential for ~~both local~~local communities, businesses and visitors to the Broads. A lack of moorings can restrict the use and enjoyment of the water, impede the local economy and, by resulting in the concentration of visitors where mooring is most plentiful, have an adverse effect on tranquillity and the quiet enjoyment of the Broads. The Authority will therefore protect existing moorings and encourage the provision of new moorings across the system.

It is however important to ensure that mooring basins and marinas are only provided in appropriate locations. New moorings support the local economy by protecting the economic viability of marinas and boatyards, thereby protecting ancillary services and facilities which might otherwise be lost. Riverside mooring can constrict the navigable waterways and can lead to congestion and overcrowding on the rivers. New moorings will therefore only be permitted where they would not have a negative impact on navigation, for example in an off-river basin or within a boat yard.

The ~~mooring gap~~ analysis undertaken for the Authority's Mooring Strategy (2009) as part of the Integrated Access Strategy<sup>10</sup> highlighted that the demand for visitor moorings exceeds supply. However, due to the conversion of boatyards to alternative uses and engineering works associated with flood defence works, the quantity of available visitor moorings across the Broads has been in decline for a number of years. Consequently, to encourage the use and enjoyment of the waterways and to support the valuable contribution made by tourism to the local economy, the Authority will ensure that development proposals

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<sup>10</sup> <http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/conservation-publications-and-reports/water-conservation-reports/49.-Integrated-Access-Strategy.pdf>

## Please note – not adopted policy.

for commercial basins and marinas do not result in the further loss of moorings available for visitor use. Proposals for new commercial basins and marinas will also be expected to make an appropriate provision for new visitor moorings.

With regards to the requirement for 10% or 2 short stay moorings (whichever is greater), the preference is to deliver these short stay moorings on site. 'On site' does not have to be part of the development site; it could be elsewhere in an appropriately accessible and suitable part of the marina or boatyard.

In exceptional circumstances the Authority may accept off-site contributions towards mooring provision. The contribution would be calculated to reflect the cost of delivering the moorings on site. That is to say that the contribution of 10% or 2 moorings would be equal to the cost of delivering the same amount of moorings as part of that scheme. This reflects that it would cost the Broads Authority this amount to deliver an equivalent provision in the same location.

Furthermore, to aid in the delivery of the 10%/2 moorings requirement, the Authority is willing to consider seasonal usage of moorings. A boatyard or marina may have moorings that they only need to use in Winter but would be able to allow them to be used for short stay moorings as per the policy requirements in the peak season (April to October). If this is the case, the Authority would expect a provision of 3 part time moorings or 2 full time moorings.

With regards to where the moorings would be delivered, paid for by the off-site contributions, the Integrated Access Strategy would be the starting point but there could be other opportunities to deliver moorings that come about outside of the Integrated access Strategy.

The quality of the waterways and surrounding landscape is vitally important to the wellbeing of the tourism industry and, by extension, the economy of the Broads. It is therefore essential that proposals for mooring basins or marinas do not impinge on the natural beauty, ecological value and local distinctiveness of the Broads or other people's enjoyment of it. If a proposal is considered in the context of Policy DP16 this policy to potentially have an effect on an internationally designated site then it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.

The Authority has produced, consulted on and adopted a Moorings Design Guide which sets out considerations for different types of moorings.

There are other policies of particular importance to proposals for new or reconfiguring moorings:

- The Safety by the Water policy sets out what the Authority requires in relation to egress from the water and life rings etc.
- The Boat Wash Down policy is of importance in relation to biosecurity and antifouling paint.
- Peat and Archaeology policies.

## Please note – not adopted policy.

### Policy x: Leisure plots and mooring plots

New leisure plots will not be permitted.

The use of mooring plots will be restricted to the mooring of boats and uses incidental to that activity.

Mooring plots will be kept generally free of buildings and above ground structures. Provision of unobtrusive moorings, steps, ramps, renewable energy generating equipment to provide energy for electric hook up points and small scale storage lockers, for use incidental to the enjoyment of the moorings may be appropriate in some locations and the provision of storage lockers for use incidental to the enjoyment of leisure plots will be permitted where they would be consistent with the objectives of protecting and conserving the Broads landscape character and ecology and with other policies of the Development Plan.

For leisure and mooring plots, Permission will not normally be granted for the erection of ~~other~~ buildings, enclosures or structures ~~and the permanent or seasonal occupation of the land, vehicles, boats, etc., or the stationing of caravans, will not be permitted.~~ The provision and maintenance of additional shrub or tree planting will be encouraged having regard to limiting wind shadow on the river in the interests of sailing.

#### Reasoned Justification

Leisure plots often result in the creation of a suburban appearance, with associated domestic paraphernalia, which detracts from the landscape character of the Broads and the visual quality of the waterscape. Consequently, the creation of new leisure plots will not be supported by the Authority.

The erection of structures on existing leisure plots, such as sheds, summerhouses, caravans and fences to demarcate the plots, has the potential to not only detract from the character and appearance of sensitive parts of the Broads landscape but also damage areas of wildlife importance. For this reason, the Authority will control development on existing plots to ensure that development only takes place where it is incidental to the mooring of boats and is consistent with the other policies in the Plan.

For the purpose of this policy the term 'leisure plot' describes a plot resulting from the sub-division of land and its use for leisure purposes (such as quiet enjoyment of the plot and scenery and informal recreation use) these may have small scale storage lockers for use incidental to the enjoyment of moorings, or modest sized single room day huts, storage sheds and boat sheds.

Within the Broads, leisure plots are often established in waterside locations, in which case they are termed 'mooring plots'. This is an area ~~of~~ land associated with moorings ~~and may~~ have boundary treatments, but limited other paraphernalia other than that incidental to the enjoyment of the moorings.

## Please note – not adopted policy.

### Policy x: Replacement Dwellings

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

- a) The scale, mass, height, design and external appearance of the replacement dwelling are appropriate to its setting and the landscape character of the location;
- b) The replacement would be located within the same building footprint as the existing dwelling or in an alternative location within the same curtilage, which would be ~~less visually prominent and/or~~ at a lower risk of flooding or would provide benefits for landscape, wildlife or cultural ;
- c) The existing dwelling has a lawful residential use; and
- d) The existing dwelling does not make a positive contribution to the character and appearance of the area or has no historic, architectural or cultural significance making it worthy of retention.

Where permission is granted, conditions will be attached to ensure that the existing dwelling is demolished and removed from the site prior to or within 3 months of the replacement dwelling first being occupied.

### Reasoned Justification

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

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

~~Proposals should seek to ensure that the replacement dwelling is located where it would have the least visual impact. When considering the suitable positioning and design of a replacement dwelling, regard will be had to national policy contained within 'Planning Policy Statement 25: Development and Flood Risk' and its associated Practice Guide, and the guidance provided in the Development and Flood Risk SPD, together with Policy DP29 of this Plan, all of which seek to ensure that development is located and designed to reduce the risks and effects of flooding.~~

Where the residential use has been abandoned, any proposals will be assessed against policies for new build residential dwellings. Dwellings recently destroyed by accident/fire will be eligible for replacement.

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

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

The replacement dwelling should be of a similar scale, massing and floorspace as the original dwelling to avoid any adverse harm to landscape character and visual amenity; where existing dwellings have a net internal floorspace below 90sqm, the proposed replacement should not exceed 90sqm. In terms of this policy the 'existing dwelling' is the dwelling as it exists at the point of application to the Broads Authority.

## **Please note – not adopted policy.**

Conditions will be attached to any permission granted to remove permitted development rights in relation to extensions on replacement dwellings less than 90sqm to ensure they are more affordable to local people.

For replacement dwellings larger than 90sqm, the 35% extension allowance should not be factored in to the proposals for the replacement dwelling as this would result in a considerably larger dwelling in terms of scale and massing than the existing dwelling on site.

A separate application would be required for any subsequent extension to the replacement dwelling (unless within permitted development rights) to ensure that the design does not adversely impact on the surrounding landscape or settlement character, and the amenity of neighbouring occupiers.

A condition will also be attached to any planning permission to ensure that where the existing building is not demolished prior to construction, it is removed from the site prior to the replacement building being occupied or up to 3 months after first occupation for family homes.

If a proposal is considered in the context of Policy DP24 this policy to potentially have an effect on an internationally designated site then it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.

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



Economy

The Authority is in the process of commissioning work to better understand the economy and employment needs of the Broads. It is intended that the final version of this research will inform the publication version of the Local Plan.

Below are the comments received from stakeholders and the public in response to the consultation on the Issues and Options version of the Local Plan.

**Q: Do you have any further thoughts on the economy and employment needs of the Broads?**

Comments received as part of the Issues and Options Local Plan**South Norfolk Council**

Issue 38: South Norfolk Council would support the retention of redundant boatyards or boatyard buildings for commercial/employment use before the consideration of alternative uses. The Council would support Option 2, a less restrictive approach, to have a hierarchy of acceptable uses with boat related employment as the preferred use. This acknowledges that boatyards are part of the unique culture of the Broads and should be retained where possible but recognising that a less restrictive policy may see such buildings brought back into life for other commercial uses more quickly.

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.

**Broadland District Council**

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:

[Agree] Option 2: Less restrictive policy and allow other uses and,

[Agree] 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

[Agree] 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.

**Environment Agency**

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.

**Inland Waterways Association**

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?

**Littlewood, Mr & Mrs P**

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.

**Norfolk County Council**

Response to Issue 38

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.

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.

**Residential Boat Owners Association**

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.

**River Thurne Tenants Association**

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.

**Evolution Town Planning**

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. 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. 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.

Our Preferred Option:

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. 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. 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:

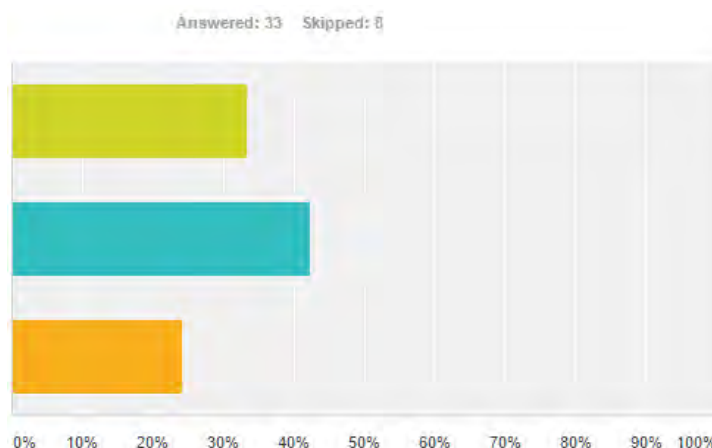
- \* Option 1 (preferred) maintain the approach in the Development Management DPD on the proviso that the strategic policies were more positively worded.
- \* Option 3 could be supported provided a bespoke site specific policy for Somerleyton marina and boatyard were adopted.
- \* Option 2 could only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

**Q9: Redundant boat yards**

**Should we...**

Ensure such sites are for boat related businesses only

Open the sites up to other types of business, not just related to boats



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)

- Your questionnaire does not give the opportunity for a proper response and thus ticking one box implies that only one answer is correct. There are many differing types of waterside sites and what is appropriate in one may not fit another. It is important to encourage investment for all forms of business, but boat related businesses are only one form of commercial operation which may be suited to waterside sites. PPG 25 ensures that the majority of waterside sites will not be lost to residential development. The real point is that the authority should not seek to influence the use of boatyards and waterside sites by suggesting that there is a material change of use between different types of mooring use. They have no existing policy for such a view, but the technique of making assertions that there is a material change between for example the mooring of hire craft and the mooring of privately owned boats prevents investment and introduces uncertainty. I reserve the right to provide further detail on this matter
- These sites should be used for business use in some way & not allowed to be developed into luxury waterside holiday homes, to give local community vital employment prospects
- Agree with Option 3 of Issue 38
- We have to move with the time I'm afraid , but no theme parks please
- You only give one option but would support other business consistent with the environmental constraints. A free for all would just lead to more expensive homes, often second homes, with riverside moorings.
- It is of course a very difficult question to deal with. So long as any development does not create an eyesore and does not alter the wind characteristics for the worse then I think this is the best we can hope for.
- Disused premises can be a blight
- Other businesses, but all should be boat or tourism related.
- Navigation is important part of the history of Broads
- It could mean more riverside facilities
- We need diversity in these areas
- If you want a strong economy you need to be flexible. The boat industry changes all the time as do other industries.
- We need businesses, we don't need housing development
- Sustaining the local environment and jobs
- Best place for cafes and other facilities. Even offices can be appealing by river and can then be tranquil for people that work there.
- Times change
- Other commercial premises, unrelated to the Broads, would be out-of-place and detract from the nature of the river culture
- it could be of benefit to owners /hire boaters possibly, depending on type of business
- You don't own these properties, we do.
- It would end up looking out of place and the wrong sort of business could take over.

- Difficult to make a hard and fast rule. It needs judgement and the people making that judgement ought to be subject to election and recall
- To provide more and better facilities for boat users.
- Mooring costs remain too high, all boat businesses should be preserved if possible to create more moorings.
- You need to try and encourage marine business especially hire yards. Without them you will lose a lot of tourists!!
- Prefer if they are kept business sites.
- Employment opportunities for the local communities.
- Anything is better than dereliction and decay which is all too prevalent on the Broads.

DRAFT

## Policy x: Flood Risk

All new development will be located to minimise flood risk, mitigating any such risk through design and implementing sustainable drainage (SuDS) principles.

~~Development will only be permitted in Environment Agency Flood Zones 2 and 3 and those areas deemed to be at risk of flooding in the Authority's Strategic Flood Risk Assessment, where appropriate and when the Sequential Test and Exception Test (parts (a), (b) and (c)) where applicable, as set out in PPS25, have been satisfied. Development proposals should be supported by a Site Specific Flood Risk Assessment.~~

Development will only be permitted in Environment Agency Flood Zones 2 and 3 when deemed an appropriate form of development (Table 3 para 67 NPPG) and where necessary the Sequential Test and Exceptions Test as set out in the NPPG, have been satisfied. Development proposals should be supported by a Site Specific Flood Risk Assessment

The Flood Risk Assessment will need to meet the requirements of ~~PPS25 the NPPG~~ and ~~give consideration to demonstrate/assess~~ the following:

- a) That the development is safe for its lifetime taking into account the vulnerability of its users;
- b) Whether the proposed development will make a significant contribution to achieving the objectives of the ~~Core Strategy and other policies of the Development Plan~~Local Plan;
- c) Whether the development involves the redevelopment of previously developed land or buildings and would result in environmental improvements over the current condition of the site;
- d) Whether appropriate measures to ensure resilience to potential flooding have been incorporated into the development;
- e) Whether appropriate measures to reduce the risk of flooding (on and offsite), including sustainable drainage systems with effective attenuation of flows to adjoining land or waterways, have been incorporated;
- f) ~~The impact of the proposal on flood risk elsewhere and on the effectiveness of flood alleviation or flood defence schemes; and~~
- g) Where the proposal involves the replacement of an existing building, whether the replacement building is located and/or designed without increasing flood risk and, where possible, to reduce the risks and effects of flooding;
- h) Demonstrates an acceptable flood risk and/or suitable flood protection mitigation measures are incorporated into the proposals, where necessary, which can be satisfactorily implemented;
- i) Whether the risk of flooding is not increased elsewhere and, wherever possible, is reduced;
- j) Demonstrates that the integrity of existing coastal and river defences are not undermined;
- k) Do not reduce the potential of land used for current or future flood management;

- l) Are compatible with the appropriate Catchment Flood Management Plan or Shoreline Management Plan;
- m) Use development to reduce the risk of flooding through location, layout and design and incorporate sustainable drainage systems to minimise surface water run-off and avoid pollution;
- n) Applicants demonstrate that sites at little or no risk of flooding are developed in preference to areas at higher risk;
- o) Safe access and egress from the site;
- p) Management and maintenance plans for flood protection/mitigation measures, including arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime;
- q) It would not negatively impact on water quality of surface water and ground water.

The relocation of existing development to an undeveloped site with a lower probability of flooding will be permitted where:

- r) The vacated site would be reinstated as naturally functioning flood plain;
- s) The benefits of flood risk reduction outweigh the benefits of leaving the new site undeveloped; and
- t) The development of the new site is appropriate when considered against the other policies of the Development Plan/Local Plan.

Where, as a result of applying the sequential test, a development is approved on an exceptions basis, planning agreements or developer contributions will be sought to ensure that the development is protected from flooding to the appropriate standard throughout its lifetime. Any required additional or enhanced flood defences should not conflict with the Broads purposes and special qualities.

Particular care will be required in relation to habitats designated as being of international importance in the area and beyond which are water sensitive, as well as habitats designated of regional or local importance.

Surface water run-off proposals should address the requirements of the Flood and Water Management Act 2010.

#### Reasoned Justification

While flooding is a natural process within a flood plain, it can disrupt and endanger life and cause significant damage to property and infrastructure. The Strategic Flood Risk Assessment for the Broads Executive Area and the Environment Agency flood maps<sup>1</sup> place the majority of the area in Flood Zone 3a, defined as 'High Probability' of flooding; over time, with rising sea levels, the majority of the area will be in Flood Zone 3b, 'The Functional Floodplain'. As such, flood risk is a major constraint on sustainable development in the Broads.

Flood alleviation and preparing for the impacts of climate change are key issues in the Broads. The boundary of the Broads is tightly drawn around the flood plain and, as a result, approximately 95%

<sup>1</sup> <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

of the Broads Authority area is at some risk of flooding. The Authority's Strategic Flood Risk Assessment (SFRA) established that the majority of this area is defined as being at a 'high probability' of flooding (Flood Zone 3a) but over time will be defined as the 'functional floodplain' (Flood Zone 3b) due to the impacts of climate change. Due to the extent and severity of this flood risk there is an extremely limited availability of developable sites in the Broads.

The NPPG defines flood risk as

*'a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.'*

All developments should be located in areas identified as being at the lowest risk of flooding.

The Government emphasises the importance of a Strategic Flood Risk Assessment to support the production of Local Plans. The Broads completed a Strategic Flood Risk Assessment in 2007. As part of the Infrastructure Group of the Norfolk Strategic Framework, the issue of updating SFRA's will be discussed. The Broads Authority will work with partners and progress will be reflected through the next stage of the Local Plan. Looking at the 'What's in Your Backyard' website of the Environment Agency, it shows that the Broads Authority Executive Area is at risk of surface water flooding, reservoir, sea and river flooding and is an area of flood warnings and flood alerts. This information will be important to the production of any future SFRA which covers the Broads.

Development proposals of one hectare or greater and all proposals for new development in Flood Zones 2 and 3 will be expected to be accompanied by a site specific Flood Risk Assessment (FRA). This FRA should demonstrate how flood risk from all sources of flooding to the development itself and flood risk to others would be managed. It will also be expected to take climate change into account, identify flood reduction measures that will be incorporated into the development (including the use of Sustainable Drainage Systems) and provide an assessment of any residual risk. The FRA should be proportionate to the level of risk and the scale, nature and location of the development. The checklist as set out in the NPPG<sup>2</sup> should be used to produce an FRA but the FRA should also address the additional considerations as set out in the policy.

In accordance with Policy CS20 of the Core Strategy, national policy, development in Environment Agency Flood Zones 2 and 3 and those areas deemed to be at risk of flooding in the Authority's Strategic Flood Risk Assessment will only be permitted when the sequential test and the exception test, where applicable, as set out in PPS25, have been satisfied. The Sequential Test will be carried out by the Authority drawing upon information submitted by the applicant. Where an exception test is necessary, the applicant's FRA must include sufficient information to enable this assessment to be undertaken. For the purposes of this policy, footprint will be defined as the ground floor area of the

<sup>2</sup> <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/site-specific-flood-risk-assessment-checklist/>

existing buildings, excluding temporary buildings, open spaces with direct external access between wings of a building, and areas of hardstanding.

Sustainable Drainage Systems (SuDS) are an alternative to traditional drainage systems that attempt to reduce the total amount, flow and rate of surface water run-off. There is a range of possible SuDS techniques that can be utilised. However, not all techniques will be appropriate for individual development sites. [See separate policy on SuDS.](#)

Given the importance and relevance of flood risk issues to the Broads applicants should, in developing proposals, have regard to ~~PPS25: Development and Flood Risk and its associated Practice Guide. National flood risk guidance and policy as set out in the NPPF and NPPG. The Authority has prepared a Supplementary Planning Document (SPD) on Development and Flood Risk which provides further details on the applicability of SuDS in the individual Broads settlements. It also contains guidance on the preparation of FRAs, the sequential and exception tests and measures to reduce flood risk to new development.~~

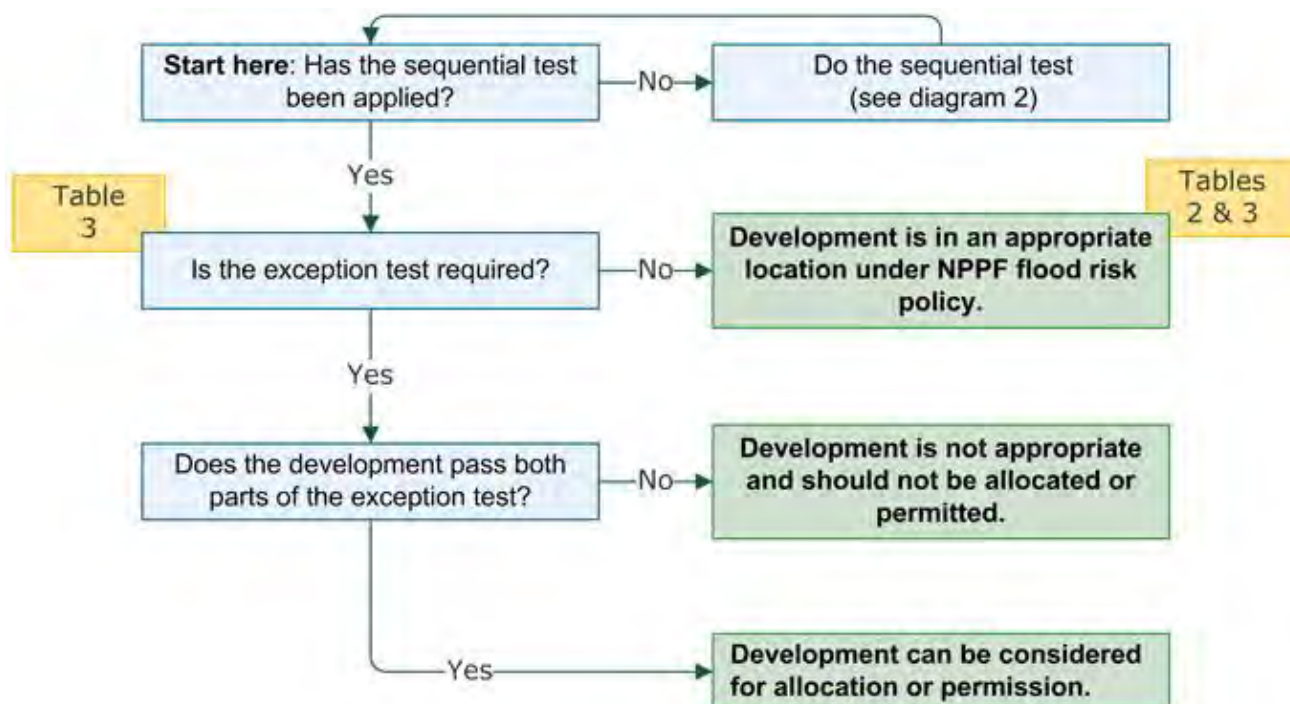
The underlying principle of development and flood risk is summarised in the NPPF (100): *'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'*. As the **site allocations** part of the Local Plan progresses, flood risk to specific sites will be an important consideration. The NPPF paragraph 100 goes on to say:

*Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:*

- *applying the Sequential Test;*
- *if necessary, applying the Exception Test;*
- *safeguarding land from development that is required for current and future flood management;*
- *using opportunities offered by new development to reduce the causes and impacts of flooding;*  
*and*
- *where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.*

We will use the Technical Guidance for the **Sequential and Exception Tests** as we formulate site allocations for various types of development. The process is neatly summarised in this diagram from the NPPG.





The Government also states in the NPPG that '*Local authorities and developers should seek opportunities to **reduce the overall level of flood risk in the area and beyond***'. The policy seeks opportunities to reduce the overall level of flood risk.

#### Flood Risk Supplementary Planning Guidance

A new Flood Risk SPD is being produced at the time of writing. The aim is to effectively explain the interpretation of the Development Management DPD policy on flood risk, in advance of the adoption of the new Local Plan.

The SPD is set to be consulted on before the end of 2016 and adopted early 2017. The final SPD will inform the Local Plan flood risk section. This section is likely to change between the Preferred Options and Publication version of the Local Plan.

The Flood Risk SPD will include detail on how to apply the sequential test in the Broads as well as include a template/guidance for producing a Flood Response Plan.

In the meantime, we welcome your comments on this draft flood risk section.

#### Comments received as part of the Issues and Options consultation

**EA:** 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 buy 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>

**IWA:** 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.

DRAFT

## Policy x: Green Infrastructure

***\*Planning Committee note that Local Green Space, Open Space, Rail Tracks and some site specific policies also relate to Green Infrastructure. Also please note that as the Local Plan progresses through its later stages there is some more work relating to Green Infrastructure being undertaken at a Norfolk level namely the Recreation Impact Study as well as a county-wide Ecological Networks study.\****

There is an expectation that new development proposals will enhance, and integrate with, the local green infrastructure network. Development shall contribute to the delivery and management of green infrastructure that meets the needs of communities and biodiversity both within and beyond the proposal boundaries, including establishment of new and enhancement of existing green infrastructure. Development that fails to exploit opportunities to integrate green infrastructure will not be considered appropriate.

Through its layout and design, new development should respond to the existing local green infrastructure network.

Where it is considered that the development will have a detrimental effect on the quantity, quality or function of existing green infrastructure then the development will not be permitted unless it can be demonstrated that an assessment has been made and suitable mitigation measures proposed. Any mitigation measures should be of equal or greater value than that which is to be compromised or lost through development.

Development that unacceptably compromises the integrity of green infrastructure assets, the delivery of Green Infrastructure strategies, and/or conflicts with the findings of relevant studies of the Authority's constituent districts and county councils without suitable justification and mitigation will not be permitted.

Green infrastructure proposals should:

- a) protect and enhance existing natural and historic environments;
- b) strengthen connectivity and resilience of ecological networks;
- c) be locally distinctive through reflecting and enhancing landscape character;
- d) maximise opportunities to mitigate and adapt to climate change;
- e) improve quality of life through provision of benefits for health and wellbeing, including opportunities to access open space and enjoyment of the Broads and its special qualities.

#### Reasoned Justification

The NPPF defines Green Infrastructure (GI) as:

*... a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.*

Green Infrastructure typologies/components include:

- **Parks and Gardens** – urban parks, Country and Regional Parks, formal gardens
- **Amenity Greenspace** – informal recreation spaces, housing green spaces, domestic gardens, village greens, urban commons, other incidental space, green roofs

- **Natural and semi-natural urban and rural greenspaces** - woodland and scrub, grassland (e.g. downland and meadow), heath or moor, wetlands, open and running water, brownfield land and disturbed ground, bare rock habitats (e.g. cliffs and quarries)
- **Green corridors** – rivers and canals including their banks, hedgerows and other natural features, road and rail corridors, cycling routes, pedestrian paths, commons and public rights of way
- **Other** - allotments, community gardens, city farms, cemeteries and churchyards

The NPPF says:

114. *Local planning authorities should:*

- *set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'*

There are three elements to the policy essentially. The first relates to the importance of incorporating existing green infrastructure assets within development proposals and enabling connectivity to other assets. This could include reflecting the green infrastructure features on site or nearby. The Broads Authority has produced a Biodiversity Enhancements Guide which could help.

The second element relates to protecting existing assets as well as ensuring proposals do not affect the ability of our constituent district councils to deliver their Green Infrastructure Strategy recommendations. Some of our districts have Green Infrastructure Strategies that fundamentally benefit the wildlife and visitors of the Broads but also act as mitigation of the effects of their development requirements and enable the delivery of housing and other development that benefits the community and visitors of the Broads.

The third element sets our criteria that proposals for Green Infrastructure need to address and these reflect the benefits that Green Infrastructure can provide:

- contributes to high quality and accessible landscapes benefitting people and wildlife;
- plays an essential role in maintaining and enhancing the health of the natural environment and its ability to provide a wealth of 'ecosystem services';
- increases ecological connectivity to overcome habitat fragmentation and increase the ability of the natural environment to adapt to climate change;
- in coastal locations, helps to provide recreational space and to enhance and protect our marine environment;
- creates attractive and accessible places for people to socialise, enjoy direct and regular contact with as well as learn about the natural environment;
- strengthens links between urban areas and their surrounding countryside, and brings the natural world into every neighbourhood, with benefits for individual and community health and wellbeing;
- supports the efficient management of water resources. A network of green spaces reduces the likelihood of flooding by allowing water to permeate through the ground;
- can also contribute to delivery of sustainable land management;
- can also create a range of social and economic benefits, both directly (through employment in capital projects and future management) and indirectly (increased visitors and visitor spend);
- supports functioning ecosystems and robust natural systems for the management of basic resources such as water, clean air, soil, and the maintenance of biodiversity;

- delivers a broad range of ecosystem services and linked social and economic benefits that clearly demonstrate the relevance of the natural environment to the lives and livelihoods of individuals and communities;
- makes a direct contribution to the climate change ‘proofing’ of peoples’ homes and communities; and
- enhances the self sufficiency of communities though providing local food production and recreational areas.

‘Blue’ Infrastructure is also important in the Broads. There are other policies in this Local Plan that relate to the water in the Broads such as water quality, surface water and staithe policies.

### Alternative Options

#### Comments received as part of the Issues and Options consultation

##### **South Norfolk Council**

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.

**Broadland District Council:** It is suggested that these two options are taking forward:

[Agree] Option 2: A Strategic Green Infrastructure Policy

[Agree] 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 Natura 2000 sites whilst increasing ecological connectivity in the area.

**Environment Agency.** 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.

**Inland Waterways Association:** 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.

**Natural England:** 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 [weblink].

##### **Norfolk County Council**

The green infrastructure team strongly support the need for a policy-based approach to the delivery of strategic 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 recreation 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.

**RSPB:** 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.

**Suffolk Wildlife Trust.** 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.

Sustainability Appraisal Summary  
Evidence used to inform this section  
Monitoring Indicators



**Broads Local Plan 2036**  
**Houseboats topic paper**  
**August 2016**

1. Introduction

The Housing and Planning Act 2016 includes a requirement for Local Housing Authorities (a function carried out by our districts) *'to consider the needs of people residing in or resorting to their district with respect to the provision of (inter alia) places on inland waterways where houseboats can be moored'*. According to the Act, *"houseboat' means a boat or similar structure designed or adapted for use as a place to live"*.

This Topic Paper sets out what the Authority is doing at the moment in relation to the needs of houseboats as well as its approach to meeting the houseboat need.

2. Where to meet the need

The requirement to assess need for houseboats is set upon a Housing Authority. The Broads Authority is not a Housing Authority and looks to the six constituent districts of Norwich, North Norfolk, South Norfolk, Broadland, Waveney and Great Yarmouth to undertake the Housing Authority function for the Broads. At the time of writing, work looking into houseboat need was being discussed at a Norfolk-wide level and the Broads Authority is involved in those discussions..

Whilst the duty to assess house boats is set upon Housing Authorities, it is likely that it is the Broads Authority Executive Area where the majority, if not all the need, will be met for the six district councils. It could be that other bodies of water which are not navigable could be suitable for houseboats and these could be located in other parts of the districts. However, if the need were to be met in the Broads, fundamentally, a houseboat will need somewhere to moor.

3. Moorings

If the boat seeks to move constantly around the system, there are many visitor moorings some of which are public 24 hour free moorings owned or maintained by the Broads Authority. The Authority is always looking at opportunities to expand the provision of moorings and has an Integrated AccessStrategy (2013)<sup>1</sup>. It is important to note that other organisations, businesses or individuals provide moorings for visitors around the system as well. For example some pubs allow mooring outside their premises for customers only. At Thurne for example, there is a fee to moor overnight.

Where a boat is being used for residential purposes and wishes to have a permanent mooring so that it does not have to constantly move around the system, these are called residential moorings.

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<sup>1</sup> <http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/conservation-publications-and-reports/water-conservation-reports/49.-Integrated-Access-Strategy.pdf>



We already have a criteria based policy to assess applications for residential moorings (see DP25 of the Development Management DPD 2011<sup>2</sup>). It is intended that with some minor amendments, this policy will be rolled forward to the new Local Plan. As such, if any application came in for residential moorings, there is a positive policy against which the application can be assessed.

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

#### 4. The role of Development Boundaries

One of the important considerations for residential moorings is that they need to be in sustainable locations. The current policy states that residential moorings need to be within or adjacent to a development boundary. The Authority currently has four areas with development boundaries and intends to roll these forward, albeit with some minor amendments. There are development boundaries at Thorpe St Andrew near Norwich, Oulton Broad, Wroxham and Hoveton and Horning<sup>3</sup>. The Settlement Study (2016)<sup>4</sup> sets out how sustainable settlements in the Broads are and the Development Boundaries Topic Paper (2016)<sup>5</sup> discusses reasons for allocating a development boundary to an area as well as why an area does not have a development boundary.

Further to the development boundaries which the Broads Authority allocates, there are some areas which the current Sites Specifics Local Plan (2014) says are suitable for residential moorings because of their proximity to facilities and services, but do not have development boundaries. These settlements are Stalham Staithe, Ferry Road in Horning, Brundall and Brundall Gardens. This wording is intended to be rolled forward to the new Local Plan. So the areas where residential mooring are deemed suitable in principle includes these settlements as well as the areas with development boundaries.

#### 5. Call for Residential Moorings

The Authority, as part of the Issues and Options consultation (Feb 2016)<sup>6</sup>, undertook a call for residential moorings. Only one response was received, from Hipperson's boatyard in Beccles. The submission has been assessed and at the time of writing was due to be discussed at Planning Committee in September 2016. The Officer's recommendation is to allocate 5 residential moorings at this site. The Authority is therefore seeking to allocate part of the system for five residential moorings.

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<sup>2</sup> [http://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0008/414368/Development-management-policies.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0008/414368/Development-management-policies.pdf)

<sup>3</sup> The current development boundaries can be found here: [http://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0009/469620/Adopted-Site-Specific-Policies-Local-Plan-11-July-2014-with-front-cover.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0009/469620/Adopted-Site-Specific-Policies-Local-Plan-11-July-2014-with-front-cover.pdf)

<sup>4</sup> [http://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0006/764475/Broads-Authority-Settlement-Study-no-hierarchy-in.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/764475/Broads-Authority-Settlement-Study-no-hierarchy-in.pdf)

<sup>5</sup> xxx

<sup>6</sup> [http://www.broads-authority.gov.uk/\\_data/assets/word\\_doc/0004/710860/Appendix-F-Call-for-suitable-areas-for-Residential-Moorings.docx](http://www.broads-authority.gov.uk/_data/assets/word_doc/0004/710860/Appendix-F-Call-for-suitable-areas-for-Residential-Moorings.docx)

### 6. The Special Qualities of the Broads

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

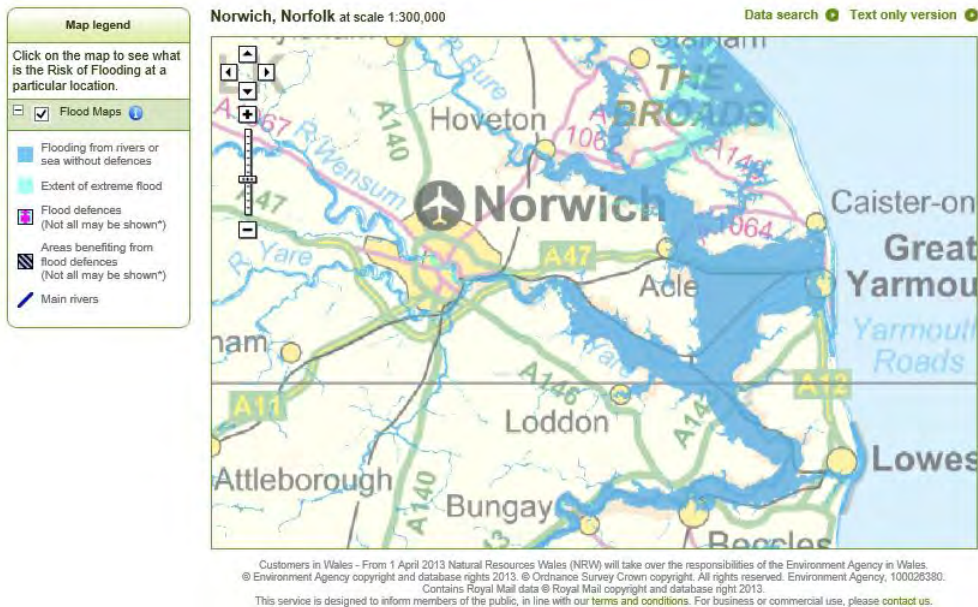
- Rivers and open water bodies ('broads')
- Fens, reed beds and wet woodlands
- Grazing marshes and ditches
- Flood plains, estuary and coast
- Navigable, lock-free waterways
- Special wildlife
- Countryside access on land and water
- Views, remoteness, tranquillity, wildness and 'big skies'
- The people,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

Some aspects are discussed in more detail below.

The boundary of the designated Broads area generally follows the extent of the flood plain of the area's rivers, so most of it is at serious risk of **flooding**. Over 80% of the area is in flood risk zone 3 (according to both the Broads SFRA and the EA flood risk maps). National planning policy in relation to development and flood risk has tightened considerably in recent years. The following map shows flood risk in the Broads<sup>7</sup>.

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<sup>7</sup> Taken from the Environment Agency website: <http://www.environment-agency.gov.uk/homeandleisure/37793.aspx>



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

The Broads is a **biodiversity** resource of international importance: a mosaic of shallow lakes (broads), reedbeds and fens, grazing marshes, heath and grassland, wet woodland, estuary and coast. These habitats support numerous species of conservation, including fen orchid, holly-leaved naiad, water vole, brown hare and bittern. The maps below show the habitats in the Broads<sup>8</sup> as well as International Designations.

The Norfolk and Suffolk Broads is renowned as the UK's premier wetland, a unique and globally important **landscape** shaped and nurtured by its inhabitants since at least Roman times. Encompassing an area of 303km<sup>2</sup>, the Broads sits between the peripheral urban areas of Norwich, Great Yarmouth and Lowestoft, with a short coastal strip at Winterton and an estuary at Breydon Water. The low-lying, mainly open and undeveloped landscape of the Broads comprises an interconnected wetland mosaic of rivers, broads, fens, marshes and woodland rich in rare habitats and species, some of which are unique to the area.

Whilst boats and moorings are part of the Broads experience, the special qualities need to be protected and enhanced. So residential moorings and associated paraphernalia need to be in the right place and ensure they do not impact the special qualities. Indeed, those living on boats need potable water, waste disposal and wastewater disposal facilities as well as potentially electricity. Dealing with these aspects of residential moorings is essential to prevent negative impacts on the Broads.

## 7. Policy Context

<sup>8</sup> Taken from the Broads Authority Biodiversity Action Plan Framework Document 2009.

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

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

*Footnote 9: For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.*

*47. To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period*

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

The National Parks Circular (2010)<sup>9</sup> refers to the need for National Park Authorities (including the Broads Authority) to meet local housing needs and in particular affordable housing, but states that the areas are not suitable for unrestrained housing.

This national policy context is an important consideration when considering how to develop in the Broads and is as applicable to housing provided through residential moorings as it is to land-based housing.

8. Definitions

The following table sets out various definitions relating to residential moorings and houseboats.

<b>Purpose of a residential mooring.</b>	<b>Broads Authority definition of Houseboat</b>	<b>Housing and Planning Act definition of Houseboat.</b>
For the purposes of the policy, a residential mooring is one where someone lives aboard a vessel (which is capable of navigation), that the vessel is	The current policy relating to residential moorings (Development Management Policy DP25) defines 'houseboat' as 'a static vessel	According to the Act, "‘houseboat’ means a boat or similar structure designed or adapted for use as a place to live”.

<sup>9</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/221086/pb13387-vision-circular2010.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf)

<p>used as the main residence and where that vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base.</p>	<p>or purpose-built structure with no form of mechanical propulsion, used or designed for residential purposes’.</p>	
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It seems that the Government’s definition relates more to the Authority’s definition of how a residential mooring would be used as it appears that the term used in the Housing and Planning Act could be better related to vessels capable of navigation.

This is important as traditionally, houseboats as defined by the Broads Authority have not really been allowed because of the design and impact on landscape. The Local Plan Issues and Options included these kind of houseboats under the ‘floating buildings’ section.

9. Floating Buildings

The Authority raised the topic of floating buildings in the Issues and Options consultation (2016). The comments received are included at Appendix 1. This is a complicated area with the numerous issues to consider as identified in the Issues and Options (also at Appendix 1). The Authority will start its research into this issue around October 2016. Findings could inform the publication version of the Local Plan. As such, it is not intended to include floating buildings in the Preferred Options version of the Local Plan.

10. Conclusion

The Authority will not know if there is a need for houseboats in time to inform the Preferred Options Local Plan. As can be seen from this Topic Paper, the Authority is open to residential moorings in the right place. The criteria policy, development boundaries, identification of other sustainable locations as well as the proposed allocations enable the provision of residential moorings/houseboats.

Appendix 1: Floating Buildings section of the Issues and Options and comments received.

Floating Buildings

With much of the Broads prone to flood risk, there are limited areas for development of buildings. Floating buildings are used around the country and world in areas prone to flooding.

To date the Authority’s approach has been one of a presumption against such buildings. The Local Plan Issues and Options offers the opportunity to further consider the issue. Below are some issues that need to be considered in relation to floating buildings.

- **Definitions**

The adopted Development Management DPD defines **houseboats** as ‘*a static vessel or purpose-built structure with no form of mechanical propulsion, used or designed for residential purposes*’. These are different to residential moorings. Locally, houseboats are also called ‘flat-a-floats’.

**Residential moorings** are for boats used as someone’s sole or primary residence and allow them to stay long term – the boat can be moved so is not static like houseboats are. The boats that use residential moorings can be called ‘live-aboards’.

There are two types of **floating buildings**; permanently floating buildings and those that float only when flood waters swell, but sit on the ground during dry conditions.

A house on dry land in Holland, which floats if waters swell.



Again in Holland, this house floats on the water



- **Broads Housing Need**

Whilst the Broads Authority does have a housing need as discussed earlier in this section, the figure of 274 dwellings is to be adjusted for completions and then current allocations and permissions need to be considered. As such, the need for the Broads Authority is not likely to be 274 dwellings but considerably less. This will be discussed further in the Preferred Options of the Local Plan. It could be that the residual need could be met on land or by our constituent district councils rather than on water. The contribution that houseboats and or/floating structures could make to meeting the housing need of the Broads is a matter to be developed through the production of the Local Plan.

- **Design**

There are instances of some house boats in the Broads. Many are quite basic in their appearance. They may add to the local character but equally, would the character of the Broads be affected by more of these types of houseboats or floating houses?

Design is an important aspect of all development in the Broads because of its special qualities. These special qualities are the reasons why people live in, work in and visit the Broads. If houseboats or floating buildings were considered appropriate in principle, the detail of the design will be an important consideration to determine if a scheme was acceptable. There could be potential for well designed, innovative and striking floating buildings in the Broads but design is a very subjective issue.

- **Location**

It is likely that the acceptable location of these floating buildings would be similar to if not the same as that of residential moorings. That is to say that locations where facilities and services often used by the community, such as GPs, shops and schools, are a walking distance from the proposed location. There are some locations in the Broads which have good access to services and facilities.

Another aspect of location is that of potential landscape impact. The sensitivity of the landscape to accommodate buildings of this type would need to be carefully considered. Not forgetting that adverse impact on navigation should be avoided.

- **Function**

How electricity, gas and freshwater are provided and foul water and waste disposed of in an appropriate way will be important considerations for any floating building. Furthermore, the user will likely want somewhere to park their car. Access to land will also be a consideration.

- **Flood Risk**

This is a major issue. National Policy seeks to avoid residential development in areas of high flood risk unless there is no other choice (sequential test) and can be made safe (exception test).

That being said, by their very nature such buildings will float. There are two types of floating buildings; permanently floating buildings and those that float only when flood waters swell, but sit on the ground during dry conditions.

Such floating buildings are present elsewhere in the country and indeed the world.

- **Uncertainty**

There will be issues with interpretation of definitions:

- When is a boat a boat?
- When is a floating building a building?
- When is a floating building a boat?

- **Houseboats - Need**

The Housing and Planning Bill includes a requirement for Local Housing Authorities (a function carried out by our districts) *'to consider the needs of people residing in or resorting to their district*

with respect to the provision of (inter alia) places on inland waterways where houseboats can be moored'. The Authority will monitor the Bill and work with Local Housing Authorities (our districts) on this issue.

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

Comments received as part of the Issues and Options consultation

**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.

**Broadland Council:** 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.

**EA:** 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.

**IWA:** 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.

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.



## Broads Local Plan 2036

### Housing topic paper

August 2016

#### 1. Introduction

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

#### 2. About the Broads Authority Executive Area

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

#### 3. Central Norfolk Strategic Housing Market Assessment

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

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

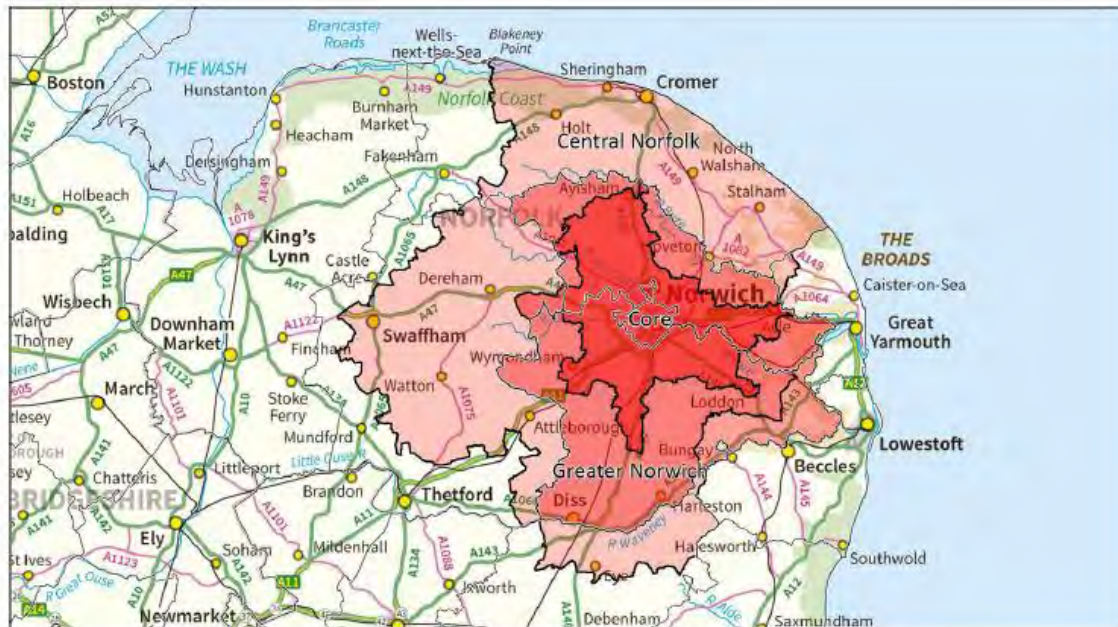
- Define the housing market area(s);
- Provide evidence of the need and demand for housing based on demographic projections;
- Consider market signals about the balance between demand for and supply of dwellings;
- Establish the Objectively Assessed Need for housing;
- Identify the appropriate balance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

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

- Core – settlements with the strongest connections to the Norwich Urban Area. This has a strong similarity to the Norwich Policy Area (except the settlements of Acle, Aylsham and Loddon).

- Greater Norwich – A restriction on the Central Norfolk Housing Market Area confining the area to within the original commissioning Local Authorities’ boundaries (Broadland, Norwich and South Norfolk) plus parts of Breckland.
- Central Norfolk – The full extent of the Central Norfolk Housing Market Area.

Figure 9: Housing Market Area in and around Greater Norwich (Source: UK Census of Population 2001 combined with DEFRA Classifications)



Source: Central Norfolk Strategic Housing Market Assessment (ORS 2015).

The study concludes that providing that 31.85% of housing was delivered to meet affordable housing need then this would cover both current and future projected needs for affordable housing, so there would be no need to increase overall housing provision.

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

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

Figure 107: Projected dwellings over the 24-year period 2012-36 Including the City Deal (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

	Norwich Policy Area	Core HMA	Elsewhere in Greater Norwich	Elsewhere in Central Norfolk Functional HMA	Areas outside the Central Norfolk Functional HMA	OVERALL TOTAL	Greater Norwich Total	Central Norfolk Functional HMA Total
<b>Total 2012-2036</b>								
Norwich	19,928	19,928	-	-	-	19,928	19,928	19,928
Broadland	9,820	10,975	3,269	-	-	13,088	13,088	13,088
South Norfolk	10,998	10,528	8,156	-	-	19,153	19,153	19,153
Breckland	-	0	-	10,142	4,193	14,335	-	10,142
North Norfolk	-	0	-	8,171	1,850	10,021	-	8,171
<b>Total</b>	<b>40,746</b>	<b>41,431</b>	<b>11,425</b>	<b>18,313</b>	<b>6,043</b>	<b>76,527</b>	<b>52,170</b>	<b>70,483</b>
<b>Annual Average by Authority</b>								
Norwich	830	830	-	-	-	830	830	830
Broadland	409	457	136	-	-	545	545	545
South Norfolk	458	439	340	-	-	798	798	798
Breckland	-	0	-	423	175	597	-	423
North Norfolk	-	0	-	340	77	418	-	340
<b>Total</b>	<b>1,698</b>	<b>1,727</b>	<b>476</b>	<b>763</b>	<b>252</b>	<b>3,189</b>	<b>2,174</b>	<b>2,937</b>

#### 4. The Broads OAN

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

If the Broads had a typical age profile and migration patterns as the rest of Central Norfolk its OAN would be around 1.0% of its existing dwelling stock per annum, which would represent a figure of around 30 dwellings per annum. However the projected dwelling requirement for the Broads is 295 for the period 2012-36 using long-term migration trends and 320 using jobs growth forecasts. The key driver behind these low figures is that the population profile of the Broads is older which gives more deaths and fewer household formations. Given the ageing population this will generate a net population growth of around 25 persons per annum who need around 13 dwellings per annum. They are very low numbers, but reflect the age profile of the population.

Figure 94: Projected Dwellings needed for the Broads by Local Authority (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

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

#### 5. Meeting the Objectively Assessed Housing Need

The table below shows completions and allocations since April 2012. It has been updated to reflect the 2015/16 monitoring data. It shows that 178 dwellings have been completed, and there are allocations for 213 units.

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

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

	Net completions since April 2012 (as at June 2016)					OAN in HMA*	OAN less completions in HMA	Outstanding allocations not yet completed~	Yet to find... (residual)#	Affordable housing delivered
	Market	Affordable	Second Home	Holiday Home	Total					
Broadland	0	0	0	0	0	200	31	-	89	13 plus claw back at Ditchingham plus any provided on the Utilities Site.
North Norfolk	21	0	0	0	21			-		
Norwich	27	13	0	0	40			Utilities site - assume 120		
South Norfolk	108	0	0	0	108			-		
Great Yarmouth	8	0	0	0	8	69	61	Hedera House, Thurne - assume 16 Somerton allocation - 1	-44	None provided.
Waveney	1	0	0	0	1	51	50	Pegasus - assume 76	26	Claw back at Pegasus.
	165	13	0	0	178	320	142		71	

\* - as calculated in Central Norfolk SHMA

~ - as allocated in the Broads Authority Sites Specifics Local Plan 2014

# - green means over provision and red means residual need

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## 6. About the Broads

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

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

Some aspects are discussed in more detail below.

The boundary of the designated Broads area generally follows the extent of the flood plain of the area's rivers, so most of it is at serious risk of **flooding**. Over 80% of the area is in flood risk zone 3 (according to both the Broads SFRA and the EA flood risk maps). National planning policy in relation to development and flood risk has tightened considerably in recent years. The following map shows flood risk in the Broads1.



<sup>1</sup> Taken from the Environment Agency website: <http://www.environment-agency.gov.uk/homeandleisure/37793.aspx>

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

The Broads is a **biodiversity** resource of international importance: a mosaic of shallow lakes (broads), reedbeds and fens, grazing marshes, heath and grassland, wet woodland, estuary and coast. These habitats support numerous species of conservation, including fen orchid, holly-leaved naiad, water vole, brown hare and bittern. The maps below show the habitats in the Broads<sup>2</sup> as well as International Designations.

The Norfolk and Suffolk Broads is renowned as the UK's premier wetland, a unique and globally important **landscape** shaped and nurtured by its inhabitants since at least Roman times. Encompassing an area of 303km<sup>2</sup>, the Broads sits between the peripheral urban areas of Norwich, Great Yarmouth and Lowestoft, with a short coastal strip at Winterton and an estuary at Breydon Water. The low-lying, mainly open and undeveloped landscape of the Broads comprises an interconnected wetland mosaic of rivers, broads, fens, marshes and woodland rich in rare habitats and species, some of which are unique to the area.

#### 7. National Policy

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

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

*Footnote 9: For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.*

*47. To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period*

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

The National Parks Circular (2010)<sup>3</sup> refers to the need for National Park Authorities (including the Broads Authority) to meet local housing needs and in particular affordable housing, but states that the areas are not suitable for unrestrained housing.

#### 8. Meeting the residual Housing Need of the Broads

<sup>2</sup> Taken from the Broads Authority Biodiversity Action Plan Framework Document 2009.

<sup>3</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/221086/pb13387-vision-circular2010.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf)



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

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

**a) We have over provided in the delivery of dwellings in the entire Broads Authority Executive Area by 71 dwellings as at 2016 with 20 years left in the plan period.**

The previous table shows the completions and allocations to date and how this relates to the different Housing Market Areas and overall need. Whilst the need may not be met in each of the three Housing Market Areas, the Authority considers that the completions, permissions and allocations provide significant housing in an extremely constrained area.

**b) We are considering development proposals through the planning application process for brownfield sites in three areas of the Borough of Great Yarmouth.**

Whilst there is no guarantee that there will be dwellings permitted on this site, there could be up to 25 dwellings provided through this route, in advance of the Local Plan, but delivered in an acceptable way for the protected landscape of the Broads. The figure of 25 includes a potential Gypsy and Traveller site which could help GYBC meet their identified need of 10 pitches.

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

GYBC, in their representations to the Issues and Options consultation, stated that they do not consider it appropriate for the Broads to be obliged to meet the housing need in the Great Yarmouth area because of the special qualities of the Broads. They have already included the whole of GY Borough, including that part within the Broads, in their assessment of the Borough's housing needs. They are keen for the Memorandum of Understanding that has been signed to stay in place, and continue the arrangement that while the Borough will endeavour to meet the whole of its needs outside the Broads, any housing development coming forward in the Broads part of the Borough is counted towards delivery against the Borough's needs.

**9. Opinions of our constituent districts**

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

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

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

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

According to the Planning Application software used by the Broads Authority, over the last ten years a total of 142 planning applications for dwellings have been received. Some have been withdrawn, some approved and some refused. But 142 applications have been received. These applications amount to 585 dwellings in total. If all applications are included (including the large scale allocations at Hedera House, Pegasus, Ditchingham Maltings and the Utilities Site) the average number of dwellings per application is: 4.12 dwellings. If the large applications are removed and we focus on windfall (unallocated sites) then the average number of dwellings per application is: 1.94 dwellings.

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

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

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

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

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

## 10. Conclusion

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

- i) We have over provided in the delivery of dwellings in the entire Broads Authority Executive Area by 71 dwellings as at 2016 with 20 years left in the plan period.
- ii) We are considering development proposals through the planning application process for brownfield sites in three areas of the Borough of Great Yarmouth.
- iii) Great Yarmouth Borough Council has offered to meet the housing need for the entire Borough outside of the Broads to protect the special qualities of the Broads.

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

DRAFT

## Appendix A: Applications for dwellings over last ten years

The following table shows the number of applications for dwellings over the last ten years. These are all the applications received, whether they are approved, withdrawn or refused. The aim is to show the average size of application received at the Broads Authority.

If all applications are included (including the large scale allocations at Hedera House, Pegasus, Ditchingham Maltings and the Utilities Site) the average number of dwellings per application is: 4.12 dwellings.

If the large applications are removed and we focus on windfall (unallocated sites) then the average number of dwellings per application is: 1.94 dwellings.

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

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

Application Number	Settlement	Decision	District	Number of dwellings
BA/2012/0333/FUL	Stalham	WDN	North Norfolk District Council	1
BA/2012/0394/FUL	Brundall	APCON	Broadland District Council	1
BA/2013/0105/COND	Burgh Castle	APCON	Great Yarmouth Borough Council	1
BA/2013/0135/FUL	Wroxham	APCON	Broadland District Council	1
BA/2013/0153/FUL	Filby	WDN	Great Yarmouth Borough Council	1
BA/2013/0156/FUL	Horning	APCON	North Norfolk District Council	1
BA/2013/0227/FUL	Horning	REF	North Norfolk District Council	1
BA/2013/0266/FUL	Filby	REF	Great Yarmouth Borough Council	1
BA/2013/0322/FUL	Horning	APCON	North Norfolk District Council	1
BA/2013/0402/OUT	Reedham	APCON	Broadland District Council	1
BA/2013/0404/FUL	Oulton	APCON	Waveney District Council	1
BA/2014/0041/CLUED	Thorpe St Andrew	CLUEDI	Broadland District Council	1
BA/2014/0108/FUL	Norton Subcourse	WDN	South Norfolk District Council	1
BA/2014/0154/FUL	Norton Subcourse	REF	: South Norfolk District Council	1
BA/2014/0343/OUT	Potter Heigham	REF	North Norfolk District Council	1
BA/2015/0148/FUL	Ludham	APCON	North Norfolk District Council	1
BA/2015/0170/FUL	Burgh Castle		Great Yarmouth Borough Council	1
BA/2015/0183/COND	Horning	APCON	North Norfolk District Council	1
BA/2015/0290/FUL	Mettingham	WDN	Waveney District Council	1
BA/2015/0352/FUL	Cantley	REF	Broadland District Council	1
BA/2015/0368/FUL	Burgh Castle	REF	Great Yarmouth Borough Council	1
BA/2016/0001/FUL	South Walsham	RET	Broadland District Council	1
BA/2016/0026/COND	Brundall	REF	Broadland District Council	1
BA/2016/0065/FUL	Runham	APCON	Great Yarmouth Borough Council	1
BA/2016/0069/COND	Hoveton	WDN	North Norfolk District Council	1
BA/2016/0080/FUL	Rockland St Mary	WDN	South Norfolk District Council	1
BA/2016/0184/FUL	Hoveton		North Norfolk District Council	1
BA/2016/0265/FUL	Rockland St Mary		South Norfolk District Council	1
BA/2016/0276/FUL	Lowestoft		Waveney District Council	1
BA/2016/0298/FUL	Kirby Bedon	RET	South Norfolk District Council	1
BA/2008/0158/FUL	Beccles	APCON	Waveney District Council	2
BA/2009/0252/FUL	Chedgrave	WDN	South Norfolk District Council	2
BA/2010/0124/FUL	Gillingham	APCON	South Norfolk District Council	2
BA/2010/0295/FUL	Ormesby St Michael	APCON	Great Yarmouth Borough Council	2
BA/2011/0161/FUL	Horning	APCON	North Norfolk District Council	2
BA/2012/0344/FUL	Loddon	APCON	South Norfolk District Council	2
BA/2015/0246/FUL	Claxton	APCON	South Norfolk District Council	2
BA/2008/0172/FUL	Stokesby	APCON	Great Yarmouth Borough Council	3
BA/2008/0345/FUL	Cantley	APCON	Broadland District Council	3
BA/2009/0257/OUT	Filby	APCON	Great Yarmouth Borough Council	3
BA/2012/0006/REM	Filby	WDN	Great Yarmouth Borough Council	3
BA/2012/0213/REM	Filby	APCON	Great Yarmouth Borough Council	3
BA/2013/0019/FUL	Wroxham	APCON	Broadland District Council	3
BA/2015/0123/FUL	Chedgrave	WDN	South Norfolk District Council	3
BA/2015/0381/FUL	Wroxham	APCON	Broadland District Council	3
BA/2008/0016/FUL	St Olaves	REF	South Norfolk District Council	4

Application Number	Settlement	Decision	District	Number of dwellings
BA/2008/0342/OUT	Filby	REF	Great Yarmouth Borough Council	4
BA/2013/0078/FUL	Stalham	APCON	North Norfolk District Council	4
BA/2014/0195/FUL	Lowestoft	REF	Waveney District Council	4
BA/2015/0277/FUL	Lowestoft	APCON	Waveney District Council	4
BA/2008/0077/FUL	Wroxham	REF	Broadland District Council	6
BA/2013/0217/OUT	Claxton	APCON	South Norfolk District Council	7
BA/2008/0197/FUL	Hoveton	APCON	North Norfolk District Council	8
BA/2011/0279/FUL	Norwich	WDN	Norwich City Council	10
BA/2009/0137/FUL	Stalham	WDN	North Norfolk District Council	14
BA/2009/0251/FUL	Stalham	APCON	North Norfolk District Council	14
BA/2016/0009/OUT	Thurne		Great Yarmouth	16
Cremorne Lane	Norwich	APCON	Norwich City Council	40
BA/2012/0271/FUL	Lowestoft	APCON	Waveney District Council	76
BA/2012/0005/FUL	Ditchingham	APS106	South Norfolk District Council	105
Generation Park	Norwich		Norwich City Council	120
				<b>585</b>

**Policy x: New housing in the Broads Authority Executive Area**a) Meeting the Objectively Assessed Housing Need

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

The Authority will allocate land in the Local Plan to provide 212 net new dwellings.

To meet the remaining requirement of 44 dwellings to 2036, which falls within that part of the Broads in the Borough of Great Yarmouth, the Authority will work with Great Yarmouth Borough Council to address housing need.

b) The type of new homes

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

c) Spatial Strategy

To facilitate sustainable development across the Broads Authority Executive Area, development proposals should accord with the spatial strategy as set out below. The spatial strategy aims to ensure that communities across the Broads Authority Executive Area continue to thrive so that they are economically resilient, environmentally sustainable, socially mixed and inclusive. The Authority will direct development to meet the amount of housing as set out in this policy to the following locations:

- i) Three brownfield sites at Pegasus in Oulton Broad, Utilities Site in Norwich and Hedera House in Thurne as detailed in the site allocation section of this Local Plan.
- ii) In relation to windfall, those areas with development boundaries as detailed in policy x.
- iii) Other areas which meet the requirements as set out in policies x, x, and x.

Reasoned Justification

The NPPF states:

*47. To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period*

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

<b>Housing Market Area</b>	<b>Districts in the HMA</b>	<b>Strategic Housing Market Assessment (SHMA) progress.</b>
Central Norfolk	North Norfolk, South Norfolk, Norwich, Broadland, Breckland	Completed 2015
Great Yarmouth	Great Yarmouth	Completed 2013
Waveney	Waveney	Ongoing



As most of the Broads Executive Area is within the Central Norfolk Housing Market Area, that Strategic Housing Market Assessment<sup>1</sup> (SHMA) calculated the Objectively Assessed Housing Need for the entire Broads Executive Area. The Objectively Assessed Housing Need (OAN) for the Broads is shown in the following table. Appendix x gives more detail in relation to the methodology used and the findings of the study. The OAN is for the period 2012 to 2036.

Part of the Broads in...	Objectively Assessed Housing Need	Annual average from 2012 to 2036
Broadland	57	2.4
Great Yarmouth	69	2.9
North Norfolk	103	4.3
Norwich	3	0.13
South Norfolk	37	1.5
Waveney	51	2.1
<b>Total:</b>	<b>320</b>	<b>13.33</b>

On the issue of meeting the objectively assessed need, the NPPF at Para 47 says Local Planning Authorities should:

*'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, **as far as is consistent with the policies set out in this Framework**, including identifying key sites which are critical to the delivery of the housing strategy over the plan period'*

It is important to note that The NPPF places great weight on the status of the Broads (para 14, footnote 9).

*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless... specific policies in this Framework indicate development should be restricted.*

*For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.*

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

- i) Completions between 2012 and July 2016

District	Housing Market Area	Number of dwellings completed
Broadland	Central Norfolk	0
North Norfolk	Central Norfolk	21
Norwich	Central Norfolk	40
South Norfolk	Central Norfolk	108
Great Yarmouth	Great Yarmouth	8

<sup>1</sup> A SHMA is a study which identifies housing need for an area. See Appendix x – Objectively Assessed Housing Need for more detail. Please note that this is being updated at the time of writing and the next version of the Local Plan will incorporate the findings of the updated study.

Waveney	Waveney	1
Total		178

## ii) Allocations within this Local Plan

Policy	Location	Housing Market Area	Approximate number of dwellings
Policy x: Utilities Site	Norwich	Central Norfolk	120
Policy x: Pegasus Site	Oulton Broad	Waveney	76
Policy x: Hedera House	Thurne	Great Yarmouth	16
Total			212

## iii) Cooperating with Great Yarmouth Borough Council

As the table in Appendix x shows, the housing need has been exceeded in the Central Norfolk and Waveney Housing Market Areas. However there is a residual need in the Great Yarmouth Housing Market Area for 44 dwellings.

GYBC, in their representations to the Issues and Options consultation, stated that they do not consider it appropriate for the Broads to be obliged to meet the housing need in the Great Yarmouth area because of the special qualities of the Broads. They have already included the whole of GY Borough, including that part within the Broads, in their assessment of the Borough's housing needs.

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

Through the Duty to Cooperate, Great Yarmouth Borough Council will deliver the residual 44 dwellings.

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

The Spatial Strategy is the overall framework for guiding development across the Broads Authority Executive Area determining in what broad locations and settlements different kinds of development will be encouraged or restricted. It offers the most sustainable way to accommodate housing in the Broads, because:

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

Other policies in this Local Plan set out the detail relating to meeting the Spatial Strategy.

Comments received as part of the Issues and Options Consultation

**South Norfolk:** 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.

**Broadland:** [Agree] 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.

**Littlewood, Mr & Mrs P:** 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.

**EA:** 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.

**Great Yarmouth 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.

**Littlewood, Mr & Mrs P:** 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. <<comment contained detail and has been made more generalised: local example of where land has been cleared of trees and other habitat before a planning application was submitted>>. <<Refers to a recent application. Application number removed>>. The surrounding dykes, marsh and carr continue to be abundant with wildlife because they are left in their natural state.

**Milner, Mr A:** I wish to express my support for Option 1, Housing requirement of zero. I

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 Broads, 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.
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.

**Residential Boat Owners Association:** The RBOA is involved at national level in promoting the contribution that residential boats can make to the supply of housing which does provide a 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.

**Thomas, Mr P;** As the bulk of the area is a 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.

**Vanston, Mr R:** 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 <<comment amended to make more general: nearby land which was also designed in a way that could affect amenity of neighbours>> 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.

**Sabberton, Mr P:** 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. <comment amended to make more generalise rather than refer to a specific development proposal: Respondent sought planning permission for a small development and following advice, withdrew the application. Felt that this development was suitable and that the planning system is too regimented.> 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.

## Appendix x – Objectively Assessed Housing Need

### Introduction

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

### Methodology

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

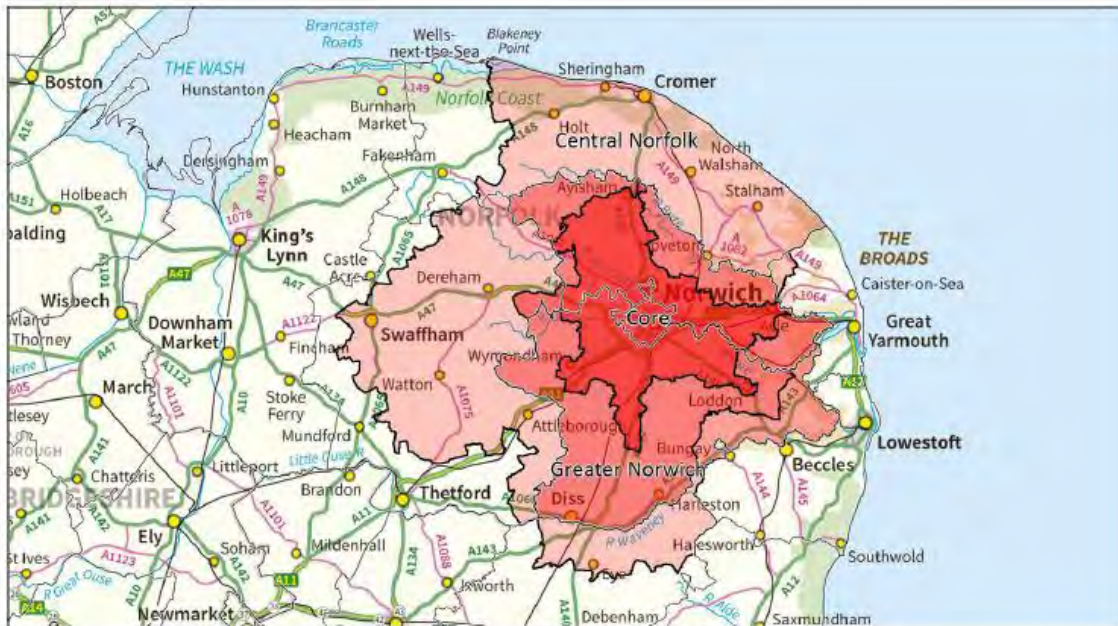
- Define the housing market area(s);
- Provide evidence of the need and demand for housing based on demographic projections;
- Consider market signals about the balance between demand for and supply of dwellings;
- Establish the Objectively Assessed Need for housing;
- Identify the appropriate balance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

### Housing Market Area

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

- Core – settlements with the strongest connections to the Norwich Urban Area. This has a strong similarity to the Norwich Policy Area (except the settlements of Acle, Aylsham and Loddon).
- Greater Norwich – A restriction on the Central Norfolk Housing Market Area confining the area to within the original commissioning Local Authorities' boundaries (Broadland, Norwich and South Norfolk) plus parts of Breckland.
- Central Norfolk – The full extent of the Central Norfolk Housing Market Area.

Figure 9: Housing Market Area in and around Greater Norwich (Source: UK Census of Population 2001 combined with DEFRA Classifications)



Source: Central Norfolk Strategic Housing Market Assessment (ORS 2015).

Affordable Housing

The study concludes that providing that 31.85% of housing was delivered to meet affordable housing need then this would cover both current and future projected needs for affordable housing, so there would be no need to increase overall housing provision

Total OAN for the entire Central Norfolk SHMA.

Figure 107: Projected dwellings over the 24-year period 2012-36 Including the City Deal (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

	Norwich Policy Area	Core HMA	Elsewhere in Greater Norwich	Elsewhere in Central Norfolk Functional HMA	Areas outside the Central Norfolk Functional HMA	OVERALL TOTAL	Greater Norwich Total	Central Norfolk Functional HMA Total
<b>Total 2012-2036</b>								
Norwich	19,928	19,928	-	-	-	19,928	19,928	19,928
Broadland	9,820	10,975	3,269	-	-	13,088	13,088	13,088
South Norfolk	10,998	10,528	8,156	-	-	19,153	19,153	19,153
Breckland	-	0	-	10,142	4,193	14,335	-	10,142
North Norfolk	-	0	-	8,171	1,850	10,021	-	8,171
<b>Total</b>	<b>40,746</b>	<b>41,431</b>	<b>11,425</b>	<b>18,313</b>	<b>6,043</b>	<b>76,527</b>	<b>52,170</b>	<b>70,483</b>
<b>Annual Average by Authority</b>								
Norwich	830	830	-	-	-	830	830	830
Broadland	409	457	136	-	-	545	545	545
South Norfolk	458	439	340	-	-	798	798	798
Breckland	-	0	-	423	175	597	-	423
North Norfolk	-	0	-	340	77	418	-	340
<b>Total</b>	<b>1,698</b>	<b>1,727</b>	<b>476</b>	<b>763</b>	<b>252</b>	<b>3,189</b>	<b>2,174</b>	<b>2,937</b>

### The Broads OAN

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

If the Broads had a typical age profile and migration patterns as the rest of Central Norfolk its OAN would be around 1.0% of its existing dwelling stock per annum, which would represent a figure of around 30 dwellings per annum. However the projected dwelling requirement for the Broads is 295 for the period 2012-36 using long-term migration trends and 320 using jobs growth forecasts. The key driver behind these low figures is that the population profile of the Broads is older which gives more deaths and fewer household formations. Given the ageing population this will generate a net population growth of around 25 persons per annum who need around 13 dwellings per annum. They are very low numbers, but reflect the age profile of the population.



Figure 94: Projected Dwellings needed for the Broads by Local Authority (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

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

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## Appendix x – Meeting the Objectively Assessed Housing Need for the Broads

	Net completions since April 2012 (as at June 2016)					OAN in HMA*	OAN less completions in HMA	Outstanding allocations not yet completed~	Yet to find... (residual)#	Affordable housing delivered
	Market	Affordable	Second Home	Holiday Home	Total					
Broadland	0	0	0	0	0	200	31	-	89	13 plus claw back at Ditchingham plus any provided on the Utilities Site.
North Norfolk	21	0	0	0	21			-		
Norwich	27	13	0	0	40			Utilities site - assume 120		
South Norfolk	108	0	0	0	108			-		
Great Yarmouth	9	0	0	0	9	69	60	Hedera House, Thurne - assume 16	-44	None provided.
Waveney	1	0	0	0	1	51	50	Pegasus - assume 76	26	Claw back at Pegasus.
	165	13	0	0	178	320	142		71	

\* - as calculated in Central Norfolk SHMA

~ - as allocated in the Local Plan

# - green means over provision and red means residual need

## Policy x: Affordable Housing

### Provision outside development boundaries

Affordable housing developments outside defined development boundaries (rural exception sites), as defined on the Proposals Map, will be permitted where:

- i) ~~All~~ Most of the proposed dwellings would be affordable;
- ii) There is an identified local need for affordable housing;
- iii) The need cannot be met within the boundaries of the adjoining local authority's part of the Broads settlement or elsewhere within established settlements in the Broads; and
- iv) The development would be in a sustainable location with adequate access to local services and facilities.

### Provision within development boundaries

For residential developments within a defined development boundary, as defined on the Proposals Policies Map, contributions towards affordable housing provision will be sought in accordance with adopted standards of the relevant District Council, including thresholds, level (%) of contribution, house types/mix and tenure, and having regard to evidence provided by Council surveys and research, including Council waiting list data.

### Size, type and tenure

The size (number of bedrooms), type (flat, house) and tenure (social or affordable rented, intermediate, shared ownership or other) of affordable homes for each proposal will be based on up-to-date evidence of local needs. A suitable mix will be determined through liaison with the applicant, parish council, relevant housing authority and rural housing enablers where applicable.

### Delivery of affordable housing

Affordable housing ~~should~~ shall be provided as completed dwellings built to an agreed standard on site or through contributions to be transferred to a Registered Provider or other provider approved by the Broads Authority (in liaison with relevant Housing Authority) ~~similar~~ at nil land costs plus the financial contribution to build out the units. Financial contributions in lieu of on-site provision will only be acceptable in exceptional circumstances. The layout and design of affordable housing will be appropriately integrated into each development to assist the management by registered providers where necessary.

The Authority will only consider reducing the requirement for the proportion of affordable housing on a particular development site, or amending the tenure mix where:

- v) Alternative provision is agreed between the Broads Authority, applicant and Housing Authority and is assessed through a site-specific viability assessment (using a recognised toolkit) and the conclusions are accepted by the Authority; or
- vi) An accepted independent review of development viability finds that alternative provision on viability grounds is justifiable; and
- vii) The resultant affordable housing provision would ensure that the proposed development is considered sustainable in social terms through its delivery of housing mix.

### Planning Obligations

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

- ~~v)~~viii) The permitted dwellings are affordable in perpetuity by being offered for initial and successive occupation at an affordable [or social](#) rent or low-cost shared ownership;
- ~~vi)~~ix) The management of the dwellings is undertaken by a local authority, Registered Provider or other suitable body such as a parish or village trust; and
- ~~vii)~~x) Initial and successive occupation of the permitted dwellings is restricted to people with strong local connections and who need to live in the immediate area.

~~'Residential development', for the purposes of this policy, includes residential moorings.~~

#### [Starter Homes](#)

[Starter homes will be required in line with national policy.](#)

#### Reasoned Justification

[The NPPG notes that affordable housing need is based on households "who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market".](#)

[It is accepted that the Broads Authority defers to the affordable housing policy of our constituent districts as this gives consistency across a district. Furthermore, as the Authority is not the Housing Authority, we work closely with our Districts who do undertake the housing function for our area. The current adopted levels of affordable housing for our districts are set out in Appendix X.](#)

[For the purposes of this policy affordable housing is defined, in accordance with Annex B of PPS3, as housing provided to specified eligible households whose needs are not met by the market. The NPPF definition of affordable housing will apply in implementing this policy.](#)

[The Broads Authority does not have a strategic housing function. As a result, the Authority applies the policies of its constituent District Councils \(in both Norfolk and Suffolk\) regarding affordable housing. There is considerable variation in the housing market of these constituent councils between Great Yarmouth, Lowestoft, areas surrounding Norwich and in the heart of the Broads. However, to a greater or lesser extent, the issue of affordable housing is pertinent to all of the Councils.](#)

[In recognition of this, Core Strategy Policy CS24 states that housing will be permitted outside of the established settlements where it is to provide affordable housing to meet a local need demonstrated by a District Council's or local housing needs survey. Furthermore, the policy specifies that a contribution will be sought from housing development – both new and conversions, permanent and holiday \(second homes\) – towards the provision of affordable housing.](#)

- Offsite provision

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

- Assessing viability

The independent review process will require the applicant to submit its development appraisal (to include a prediction of all development costs and revenues for mixed use schemes) to an Authority-appointed assessor, who will produce an alternative appraisal for comparison by the Authority. The independent review shall be carried out entirely at the applicant's expense. Where little or no affordable housing would be considered viable through the appraisal exercise, the Authority will balance the findings from this against the need for new developments to provide for affordable housing. In negotiating a site-specific provision with the applicant, the Authority will have regard to whether or not the development would be considered sustainable in social terms.

- Information to accompany an application.

Developers advancing specific proposals that incorporate an element of affordable housing should submit an affordable housing statement alongside their application. This should provide information on the number of affordable residential units, the mix of affordable units in terms of type, tenure (intermediate/ social rented) and size (number of bedrooms and gross floorspace), and the arrangements for managing the affordable housing units. Where the proposal comprises affordable housing on a site outside the development boundary, this statement should also provide information to demonstrate that the local need for affordable housing cannot be met within the development boundaries of the adjoining local authority's part of the Broads settlement or elsewhere within development boundaries in the Broads.

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

- Using planning obligations

To ensure all affordable housing remains affordable to the local community in perpetuity, planning obligations will be sought to ensure that the initial and successive occupation of the dwellings is restricted to people with strong local connections and who need to live in the immediate area. This will include people who need to live in the Broads as a result of their current employment and existing residents needing separate accommodation in the area (for example people in housing need due to sub-standard, overcrowded or otherwise unsuitable accommodation).

- Providing affordable housing

The Affordable Housing policy states that 'Most of the proposed dwellings would be affordable' when referring to affordable housing schemes outside of development boundaries. This is in keeping with the NPPF definition for rural exception sites: '*small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding*'.

'How 'most' is defined will reflect the specifics of the scheme but it is expected that the majority of a scheme will be affordable housing. The market housing element of rural exception sites is to enable the development of affordable houses. Applications need to fully justify

the proposed market housing element (the split between market and affordable) of rural exception site schemes via an assessment. See 'assessing viability' section of the Reasoned justification to this policy for more information.

- Delivering affordable housing in the Broads

Delivery of affordable housing in the Broads will be difficult.

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

Over the last ten years, applications for dwellings have tended to be in the region of on average x dwellings per application<sup>1</sup> (according to an assessment of the Authority's planning applications as set out in the Housing Topic Paper)<sup>2</sup>. A new Government policy has been introduced that says affordable housing and tariff style contributions should not be sought on sites of 10 units or less, and which have a maximum combined gross floor space of 1,000 square metres. Presuming that the current trend of size of housing applications continues (windfall), it is unlikely that affordable housing will be delivered through windfall schemes.

Turning to the large scale allocations and applications, Pegasus (Oulton Broad, 76 dwellings) and Ditchingham Maltings (108 dwellings) are of a scale that triggers the affordable housing policies of Waveney and South Norfolk district respectively. However, a clawback mechanism is in place. The Clawback Mechanism is included as a Schedule in the S106 Agreement document. It is worded and calculated so that the Council will receive 33% of the difference between the agreed 'base price' of the scheme and the final 'sale price' of the scheme. This mechanism allows a development to proceed where in the current economic situation it cannot sustain an affordable housing contribution, but it ensures that the District Council will get an affordable housing contribution if market/economic conditions improve before the development is built out/ completed. It is basically a safeguard mechanism to avoid development being thwarted by an inability to make S106 contributions but which will protect District Councils from losing out if the economic situation improves before the development is completed.

- Starter Homes

According the Housing and Planning Act (2016)<sup>3</sup> "starter home" means a building or part of a building that—

- is a new dwelling,
- is available for purchase by qualifying first-time buyers only,
- is to be sold at a discount of at least 20% of the market value,
- is to be sold for less than the price cap, and

<sup>1</sup> This excludes the applications relating to large scale allocations as set out in the 2014 Sites Specifics Local Plan, some of which have been rolled forward to this new Local Plan.

<sup>2</sup> xxx

<sup>3</sup> [http://www.legislation.gov.uk/ukpga/2016/22/pdfs/ukpga\\_20160022\\_en.pdf](http://www.legislation.gov.uk/ukpga/2016/22/pdfs/ukpga_20160022_en.pdf)

e) is subject to any restrictions on sale or letting specified in regulations made by the Secretary of State (for more about regulations under this paragraph, see section 3).

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

A technical consultation relating to Starter Homes ended in May<sup>4</sup>. In this consultation, the Government discuss various elements of starter homes including thresholds and percentage requirements. As the publication version of the Local Plan is produced (after the Preferred Options consultation) we will make sure we are aware of any regulations that are produced by the Government in relation to starter homes.

- Habitats Regulations Assessment

If a proposal is considered in the context of Policy DP23this policy to potentially have an effect on an internationally designated site then it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.

**Question:** There might be circumstances where more than half of the affordable dwellings on a rural exceptions site (outside of development boundary) are needed as open market to provide grant-free cross-subsidy. We currently propose to say ‘**most** of the proposed dwellings would be affordable’. Do you have any thoughts on the wording of this part of the policy? What are your reasons for your comments?

Comments received as part of the Issues and Options consultation

**South Norfolk:** 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.

**Broadland:** It is understood that is intended to role forward the policy approach of using the percentages of your districts.This is an acceptable approach

**Inland Waterways Association:** 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

<sup>4</sup> <https://www.gov.uk/government/consultations/starter-homes-regulations-technical-consultation>

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.

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## Appendix x: Current constituent district policies relating to affordable housing.

District	Document	Policy
Great Yarmouth	Core Strategy (2015)	<ul style="list-style-type: none"> <li>Sub area 1: 20% on sites of 5 or more.</li> <li>Sub area 2: 10% on sites of 5 or more</li> <li>Sub area 3: 10% on sites of 15 or more</li> </ul>
North Norfolk	Core Strategy (2008)	<ul style="list-style-type: none"> <li>10 or more dwellings or sites of more than 0.33 hectares in Principal and Secondary Settlements, not less than 45%.</li> <li>2 or more units or on sites larger than 0.1 hectares in Service Villages and Coastal Service Villages, not less than 50%</li> </ul>
Broadland	Joint Core Strategy (2011 and 2014)	<p>The proportion of affordable housing, and mix of tenure sought will be based on the most up to date needs assessment for the plan area. At the adoption of this strategy the target proportion to meet the demonstrated housing need is:</p> <ul style="list-style-type: none"> <li>on sites for 5-9 dwellings (or 0.2 – 0.4 ha), 20% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5)</li> <li>on sites for 10-15 dwellings (or 0.4 – 0.6 ha), 30% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5)</li> <li>on sites for 16 dwellings or more (or over 0.6 ha) 33% with approximate 85% social rented and 15% intermediate tenures (numbers rounded, upwards from 0.5)</li> </ul>
Norwich		
South Norfolk		
Waveney	Development Management Policies (2011)	<ul style="list-style-type: none"> <li>From the start of 2015 planning applications for 5 to 14 dwellings inclusive shall provide 35% affordable housing on-site or provide an equivalent off-site financial contribution for affordable housing elsewhere.</li> <li>Outside the Area Action Plan area of Lake Lothing planning applications for proposals of 15 or more dwellings shall provide a minimum of 35% on-site affordable housing.</li> </ul>

The Central Norfolk SHMA has calculated the need for Affordable Housing for four of our constituent districts. Waveney and Great Yarmouth have not been calculated as part of this study. Waveney District Council will produce their affordable housing figure as part of their SHMA which is being produced at the time of writing. The previous table shows that GYBC has recently adopted their Core Strategy. These figures are not adopted.

	Broadland	North Norfolk	Norwich	South Norfolk
<b>Total Affordable Housing</b>	2,200	2,200	7,000	3,400
<b>Total Housing</b>	13,100	10,100	19,900	19,200
<b>Percentage</b>	16.79%	21.78%	35.18%	17.71%

**Policy x: Custom/self-build**

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

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

Reasoned Justification

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

The NPPG states:

*The Government wants to enable more people to build their own home and wants to make this form of housing a mainstream housing option. There is strong industry evidence of significant demand for such housing, as supported by successive surveys. Local planning authorities should, therefore, plan to meet the strong latent demand for such housing. Additional local demand, over and above current levels of delivery can be identified from secondary data sources such as: building plot search websites, 'Need-a-Plot' information available from the Self Build Portal; and enquiries for building plots from local estate agents. However, such data is unlikely on its own to provide reliable local information on the local demand for people wishing to build their own homes. Plan makers should, therefore, consider surveying local residents, possibly as part of any wider surveys, to assess local housing need for this type of housing, and compile a local list or register of people who want to build their own homes.*

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

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

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

Custom/self-build register

Since April 2016, the Authority has a register<sup>1</sup> in place where those wishing to build their own homes can register their interest. At the time of writing there were 41 individuals interested in building their own home. Please note however that the register covers four Local Planning Authorities who are working together: South Norfolk, Breckland, King's Lynn and West Norfolk and the Broads Authority and when assessing the register it seems that on the vast majority of cases, individuals have ticked that they wish to develop in the Broads as well as in another district; there are few, if any, individuals expressing a desire to develop in the Broads and the Broads alone.

Draft regulations

The Housing and Planning Act came into force in 2016 and sets out further clarifications and requirements in relation to self and custom build. One regulation that has come out of the Act (albeit in draft format at the time of writing) related to the duty to grant planning permission within three years of a base period and the potential to charge fees for administering the register.

Comments received as part of the Issues and Options consultation

<sup>1</sup> <http://www.broads-authority.gov.uk/planning/Other-planning-issues/self-build-and-custom-build-register>

**South Norfolk Council.** 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.

#### **How can the Broads Authority make it easier for people to build their own homes?**

- Adopt Option 2 (Issue 26)
- Ease restrictions but make sure they are eco-friendly and can blend into the area
- Encourage neighbouring authorities to assist
- Be far less negative to planning applications in so called non-development areas. Not sure it should
- Grants for renewable energy projects
- It can't and it isn't their statutory duty.
- Adopt the policy that unless there is a real reason to object than it can go ahead
- Stop having such ridiculous planning regulations which, in the Broads Authority are down to the individual's feelings on a day and do not have precedents. This is ridiculous and an appalling way to behave.
- I don't know because I've never looked into building a home
- They can't
- Stop insisting on wooden windows instead of triple glazed (plastic) ones )
- Relax planning rules, work with people
- Relax planning restrictions
- Give clear planning advice
- It can't
- Be realistic with planning for a change.
- They shouldn't be allowed to.
- Pass - regardless of whether the area is or is not a National Park, it is the landscape which is to be preserved. That should mean minimal development beyond properties already there
- Simplify the planning system. Ensure a level playing field for people of all budgets.
- No need, it is a matter outside scope.
- Stick to conserving the Broads and navigation. Building new homes alongside the Broads should be restricted.
- A bit more publicity might help. Try emailing a notice to local Parish Councils to display in village halls & notice boards.
- Not sure
- Relax planning laws.

## Housing for Older People

The NPPG says:

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

Older people in housing are included in the Objectively Assessed Need as calculated in the Central Norfolk SHMA. However, those in Class C2 are not included.

According to the Central Norfolk SHMA, the institutional population (older people residing in care homes) is projected to increase by 4,551 persons between 2012 and 2036 in the Central Norfolk SHMA authority areas (North Norfolk, Norwich, Broadland, South Norfolk, Breckland). The OAN as set out previously in this section does not include this figure. It does not necessarily follow that all of this need should be provided as additional bedspaces in residential institutions in Use Class C2.

It is important to note that the Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible, thereby avoiding expensive hospital and care home services. Therefore, despite the ageing population, current policy means that the number of care home and nursing home beds required may increase proportionately more slowly than the number of older people, as people are supported to continue living in their own homes for longer.

If bedspaces in residential institutions in Use Class C2 are counted within the housing supply (to meet the target/need) then the increase in institutional population aged 75 or over would need to be counted as a component of the housing requirement (in addition to the assessed OAN). If these bedspaces are not counted within the housing supply, then there is no need to include the increase in institutional population as part of the housing requirement.

Additional to the conclusions of the Central Norfolk SHMA, Norfolk County Council is developing a comprehensive Housing Strategy Framework, due to be completed in 2016.

- To encourage housing with support as a solution to preventing people requiring more intensive institutional care
- To encourage greater self-reliance within supportive communities
- To develop the most cost effective solutions to meet care outcomes
- To offer a range of options within the constraints of Norfolk geography and demography
- To support the objectives of integrating health, social care and housing policy

Great Yarmouth Borough and Waveney District may have a small number of older people needing Class C2 use properties in the Broads part of their area which the Central Norfolk SHMA has not calculated. This will add to the housing requirement. Through the Norfolk Strategic Framework Housing Group, the county-wide approach to addressing older people housing will be agreed<sup>1</sup>. The Authority will also work with Waveney District Council as their SHMA is produced. We will continue to monitor evidence and discussions and address accordingly in future versions of the Local Plan.

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<sup>1</sup> At the time of writing, further work to look into the topic of housing for older people was being discussed across the Norfolk Local Planning Authorities. The Authority will seek to be involved and any progress will inform the publication version of the Local Plan.

Policy x – Part of the design policy

*Please note that it is intended that this becomes part of the design policy that was considered at August Committee. It is intended to produce some guiding principles, but these will be worked up towards the end of the year and inform the Publication version of the Local Plan.*

Proposals will be assessed to ensure they effectively address the following matters (*inter alia*):

x) **High quality landscaping.** A Landscaping Strategy is required to accompany applications for major development and for all other development where new floorspace is proposed which sets out the approach to landscaping which must be appropriate and relate to the location and setting.

Reasoned Justification

Landscaping is part of the design response to mitigate and/or enhance a proposal. Some types and forms of hard surfaces and structures or soft landscaping (planting) can have biodiversity, amenity and recreation benefits and are more appropriate in the Broads Executive Area than others. What is suitable on a site would reflect the location and setting. The landscape design proposals should reflect the key positive characteristics of the locality and its setting.

Development proposals should normally be accompanied by:

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

Linked to this policy is Policy X on land raising and Policy x on disposal of excavated material.

Landscaping proposals, both hard and soft, should normally form an integral part of development proposals. The Authority will, however, seek appropriate conditions and/or planning obligations to secure the implementation of landscaping schemes and the replacement of trees, hedgerows or other natural features or their protection during the course of development. Payment for the maintenance and management of new landscaping may be sought and controlled via a planning obligation. On certain schemes the submission of a landscape strategy would be acceptable with the detailed landscape proposals conditioned

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

Alternative Options

Comments received as part of the Issues and Options:

**South Norfolk Council** would support the inclusion of a landscaping policy in the Broads Local Plan.

**IWA:** 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.

**Norfolk County Council:** a policy would clarify the difference between landscape character and landscaping, and could be underpinned by guidance for applicants.

Sustainability Appraisal Summary

Evidence used to inform this section

Monitoring Indicators

DRAFT

Policy x: Light pollution and dark skies

See map x.

The tranquillity and dark sky experience of the Broads will be maintained and improved.

Development proposals are required to address light spillage and eliminate all unnecessary forms of artificial outdoor lighting by ensuring that:

- a) There is no external lighting within Dark Sky Core Zones category A .
- b) External lighting within the Dark Sky Zone category B is strictly controlled.
- c) Good lighting management and design is applied throughout the Broads

Development proposals that involve external lighting, outside the Dark Sky Core Zones category A, will only be permitted where it can be demonstrated that they are required for safety, security or community reasons and where the details minimise light spillage.

Building design that results in increased light spill from internal lighting needs to be avoided, unless suitable mitigation measures are implemented.

Applicants are required to demonstrate that they meet or exceed the Institute of Lighting Professionals guidance and other relevant standards or guidance for lighting within environmental zones<sup>1</sup>.

#### Reasoned Justification

No or low levels of light pollution are an important aspect of tranquillity. Light pollution comes in many forms:

- **Sky glow** is a product of light being scattered by water droplets or particles in the air.
- **Light trespass** occurs when unwanted artificial light illuminates an area that would otherwise be dark.
- **Glare** is created by light that shines horizontally.
- **Over illumination** refers to the use of artificial light beyond what is required for a specific activity.

There is firm evidence of issues arising as a result of artificial lighting; wildlife and human health can be affected and fundamentally, inefficient use of lighting wastes money and energy affecting businesses.

It is important to note that artificial lighting is not detrimental in all cases. It has helped society by extending the length of the productive day for example. Indeed, the 'solution' to the issue is not necessarily turning off all lighting; artificial lighting does not necessarily produce light pollution. Light

<sup>1</sup> For the purposes of the ILP lighting guidance (CIE 150:2003 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations <https://www.theilp.org.uk/documents/obtrusive-light/> ) the Broads Authority is included within Environment Zone 1 as a reflection of its protected status and its intrinsically dark skies.

pollution is the term for artificial light that is excessive or intrudes where it is not wanted or expected. There are many sources of light pollution. For example some older street lights emit light pollution as do security lights mounted at an angle above the horizontal. Well-designed lighting, on the other hand, sends light only where it is needed without scattering it elsewhere; “The right amount of light and only when and where needed” (Campaign for Dark Skies motto).

The NPPF Paragraph 125 says:

*“By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”.*

To be considered a dark sky of sufficient quality by the International Dark Sky Association, values of 20 magnitudes per arc second must be achieved. The Authority has assessed over 400 points around the entire Broads Authority Executive Area<sup>2</sup>, from land and water, to understand the quality of the dark skies. Results show that the majority of the Broads has good quality dark skies with the majority of readings being over 20 magnitudes per arc second. The Authority therefore considers that the Broads is an intrinsically dark landscape which must be preserved.

Whilst the Authority’s survey effectively looked upwards, the CPRE<sup>3</sup> undertook a study that effectively looked down to the earth.

Both datasets were assessed and compared and have informed the final zones as set out in the policies map. A report<sup>4</sup> which explains the assessment between the two datasets has been produced.

When considering lighting as part of a scheme, applicants need to consider the following early on in the design of a scheme with an assessment submitted with the planning application:

- Which zone are you located in?
- Do you need light in the first place and if so why?
- What is the lighting task/area to be lit?
- Are you over lighting? What is the minimum lighting you require?
- If lighting is required, is it designed to not add to sky glow, not result in light trespass and glare and does not over illuminate? How?

It is important to note that lighting schemes on their own do not always need planning permission. If the Authority seeks and is awarded Dark Sky Status, work will be undertaken in key areas to reduce the impact of light pollution, in partnership with the local community.

**Question:** The Authority is considering producing a bespoke, user friendly guide for development in the Broads. Do you have any thoughts on this?

<sup>2</sup> [http://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0007/757402/Broads-Authority-Dark-Skies-Study-March-20161.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/757402/Broads-Authority-Dark-Skies-Study-March-20161.pdf)

<sup>3</sup> Night Blight: <http://nightblight.cpre.org.uk/>

<sup>4</sup> xxxxx



Dark Sky Status

The International Dark Sky Places Program promotes preservation and protection of night skies across the globe. It is an award administered by the International Dark Skies Association (IDA). In dark sky places, councils, landowners, businesses, individuals and communities work together to reduce light pollution. There are three types of places: Reserve (large areas), Park (small with large population) and Community (smallest). The Broads Authority is exploring the potential for applying to be a Dark Sky Place.

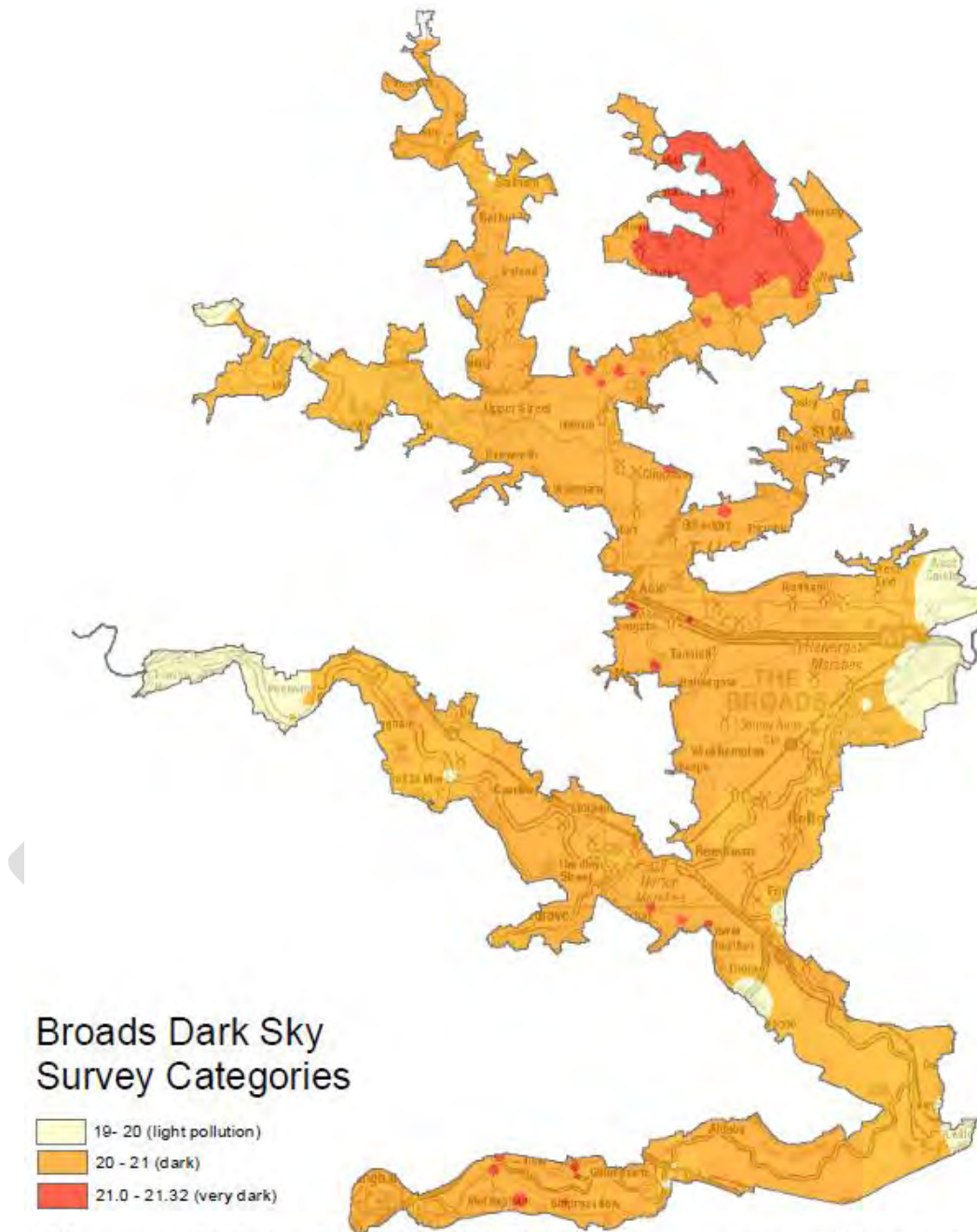
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Light Pollution and Dark Skies – map of zones

Please note that the final map is being completed and will look similar to this map.

Using this map, Zone A is above 21, Zone B is between 20 and 21.

There will be a zone A area around Geldeston and this will be explained in the report.



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**Broads Authority**  
**Dark Sky and Night Blight Data comparison**  
**August 2016**

1. Introduction

This report compares the two recent datasets that assess light pollution in the area.

The Dark Skies Survey<sup>1</sup> data was compiled between October 2015 and March 2016. More information can be found in the Dark Skies Survey Study. This work effectively looked up from the ground.

The other evidence (Night Blight<sup>2</sup>) was completed by the CPRE in 2016 and used satellites to assess the light pollution around the whole country, by looking down at the earth.

Both sets of data are important and this study shows how the results of the two studies compare to each other. It ends with a summary map that will accompany a Local Plan policy relating to light pollution.

2. Assessment

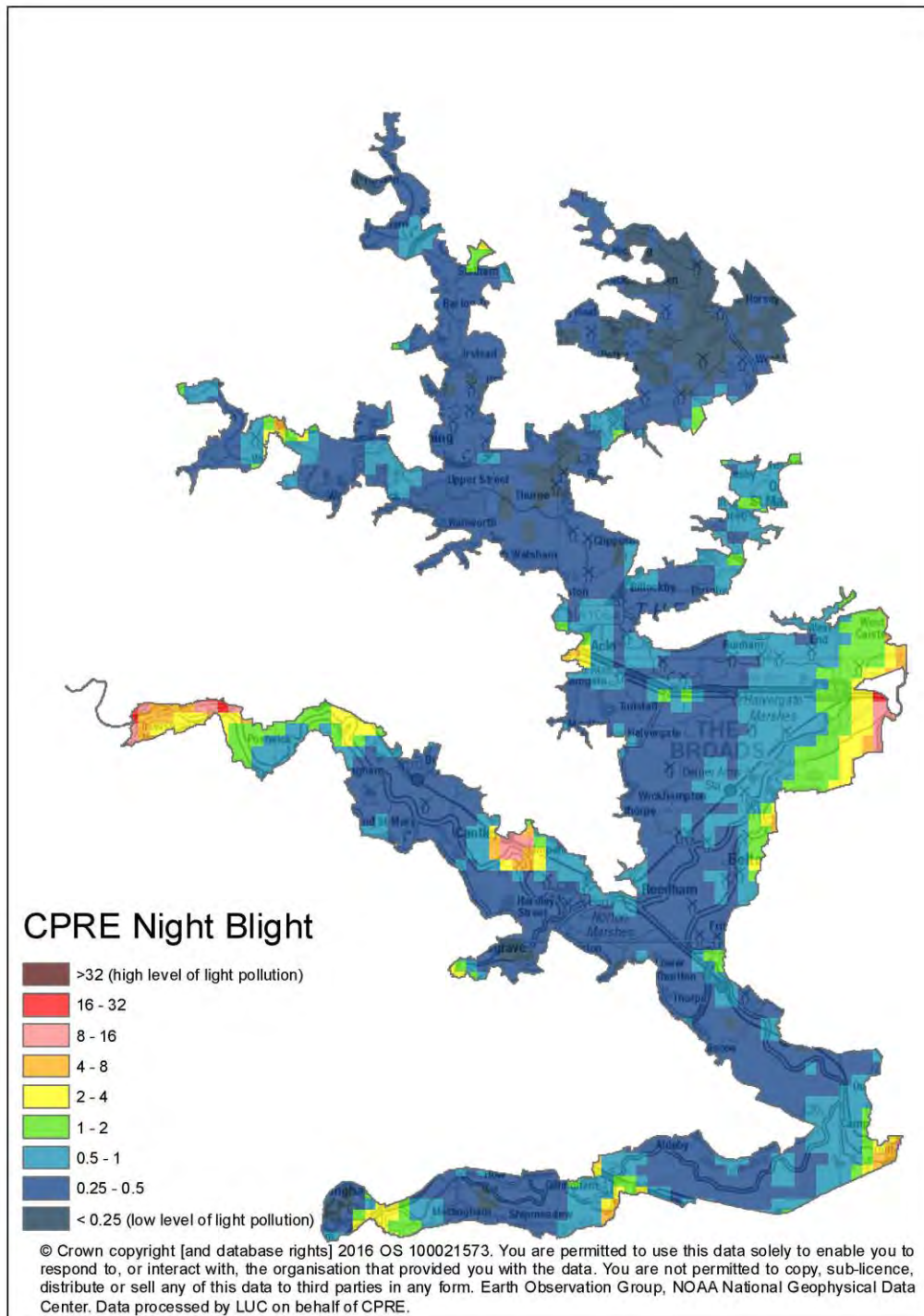
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<sup>1</sup> [http://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0007/757402/Broads-Authority-Dark-Skies-Study-March-20161.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/757402/Broads-Authority-Dark-Skies-Study-March-20161.pdf)

<sup>2</sup> <http://nightblight.cpre.org.uk/>

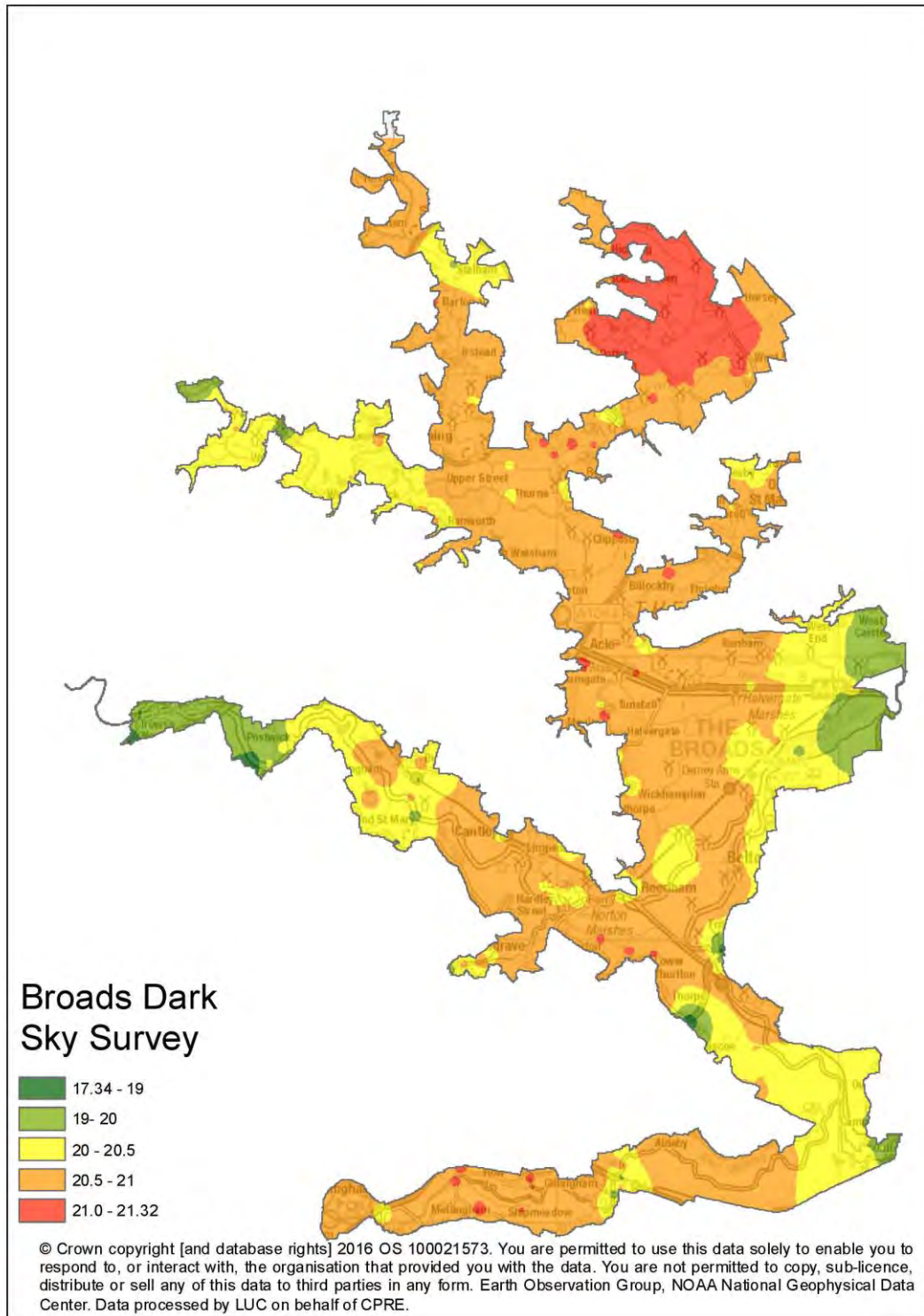
## Map 1: Night Blight

This shows the amount of light spilling up into the night sky. Each pixel shows the level of radiance (night lights) shining up into the night sky. These have been categorised into colour bands to distinguish between different light levels. Areas with 0.25 or less radiance levels are the darkest. Each pixel represents 400m on the ground.



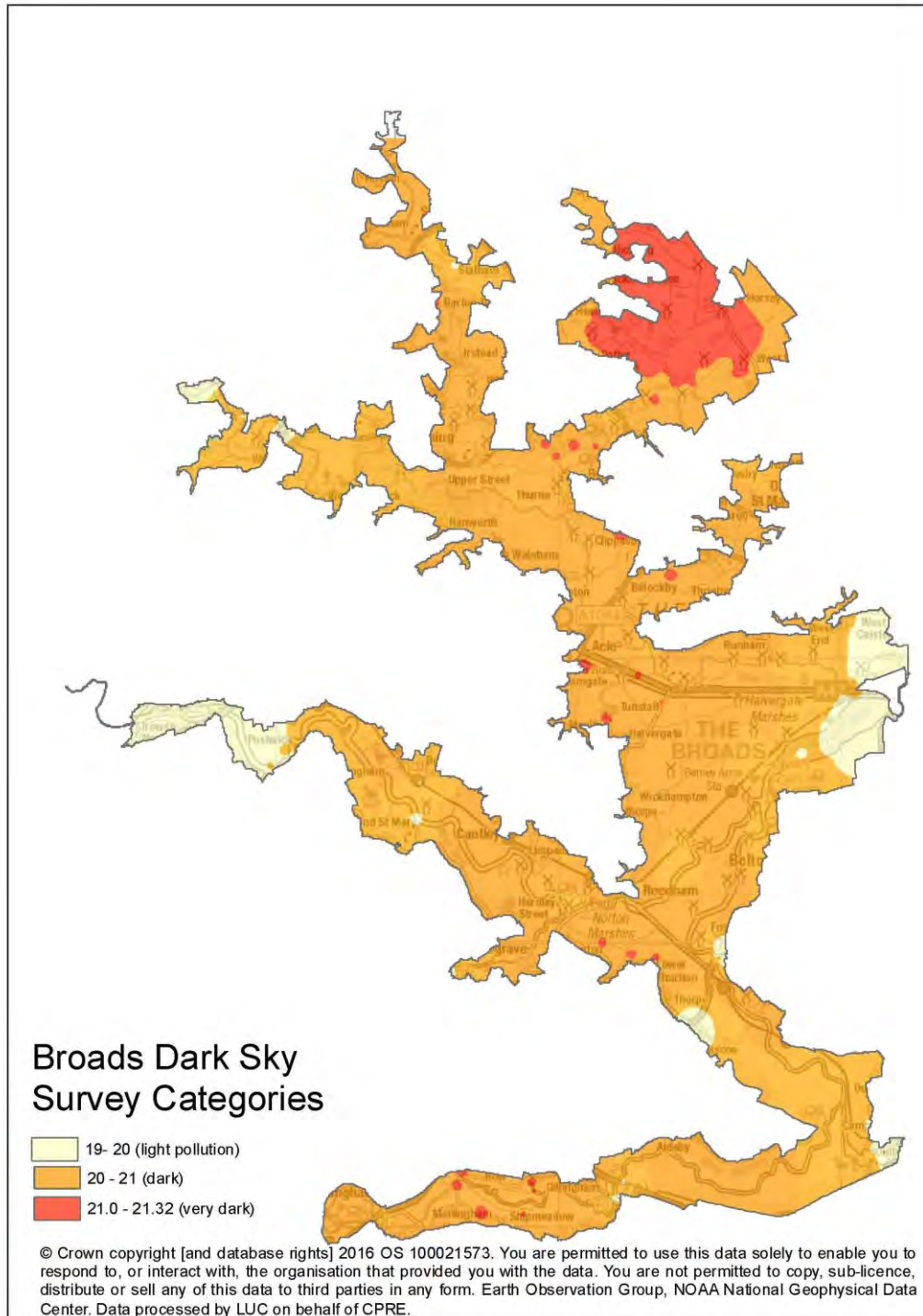
## Map 2: Broads Dark Sky Survey

This measured brightness of the night sky from the ground. The survey point dark sky quality metre values have been interpolated using an Inverse Distance Weighted algorithm to create a surface indicating the levels of brightness at night across the Broads. This algorithm works on the assumption that things that are close to one another are more alike than those that are farther apart.



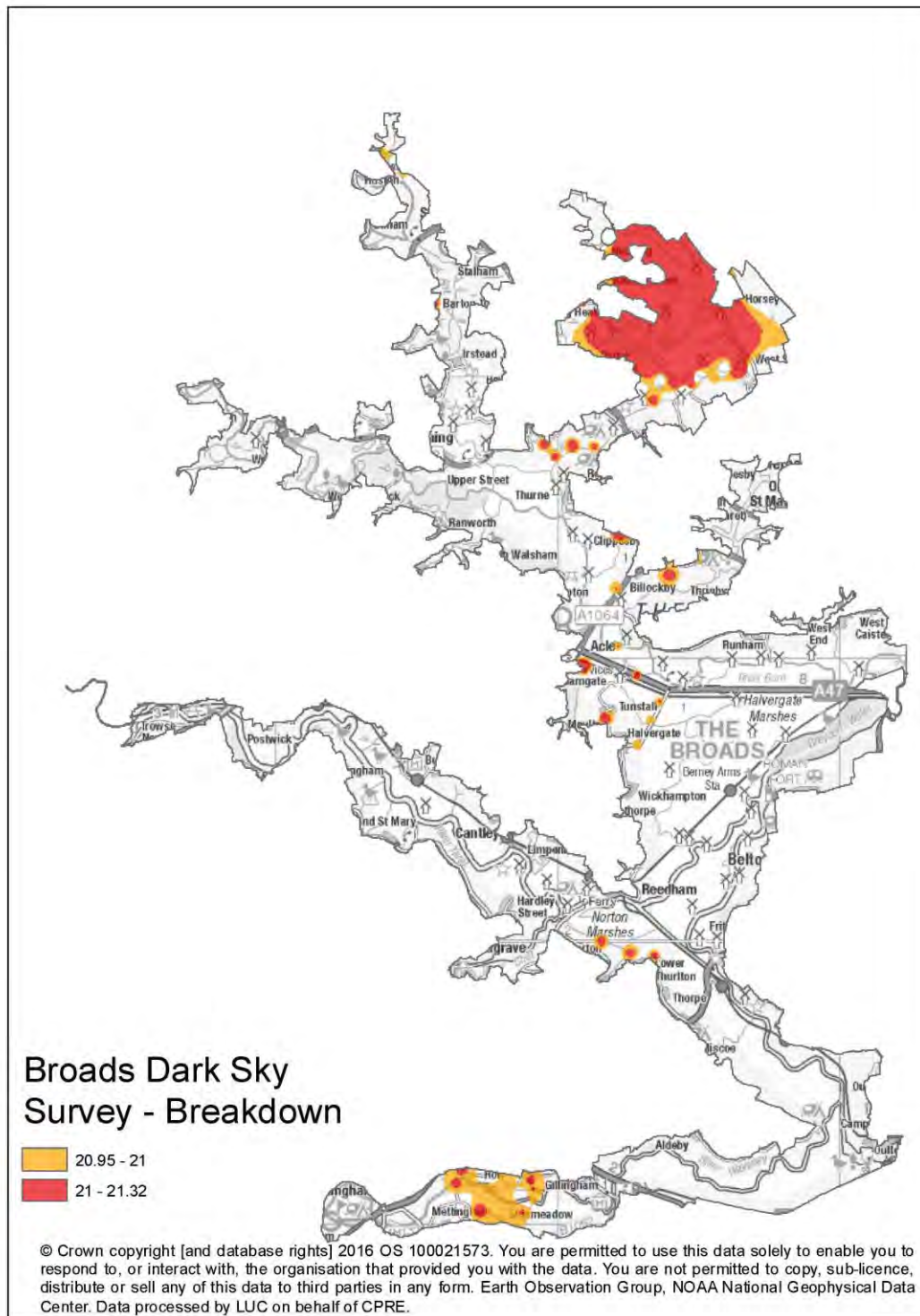
### Map 3: Broads Dark Sky Survey Categories

The interpolated surface has been divided into 3 categories. This shows three clear general areas: Very Dark (>21), Dark (>20) and areas where light pollution has a significant effect on the readings taken.



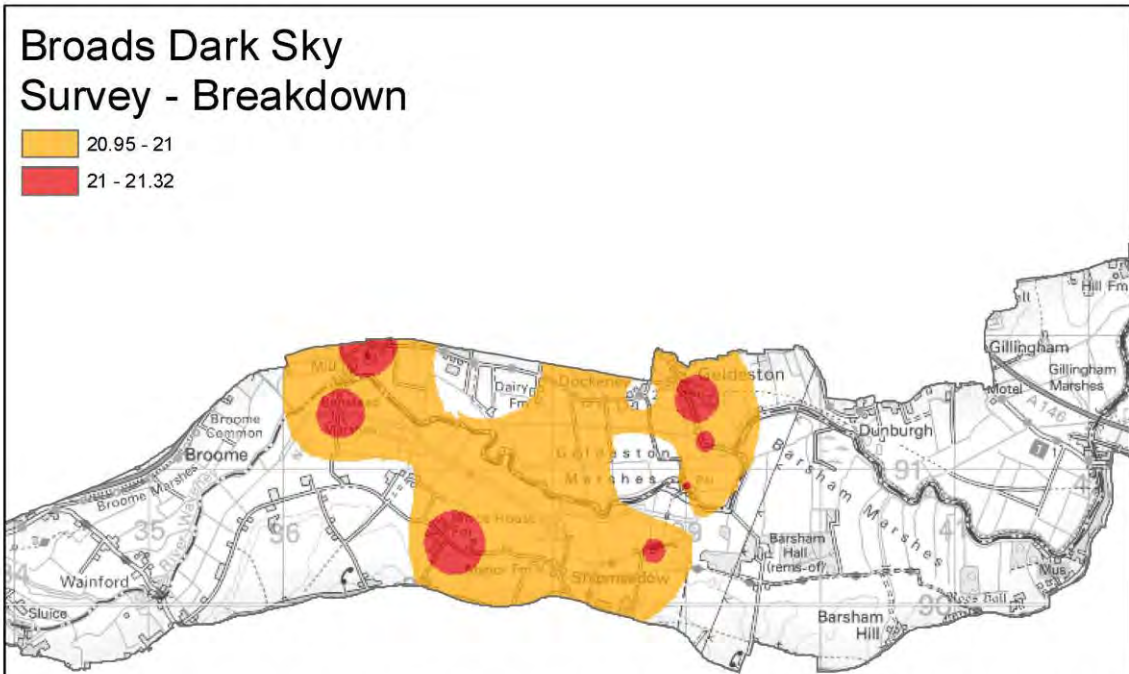
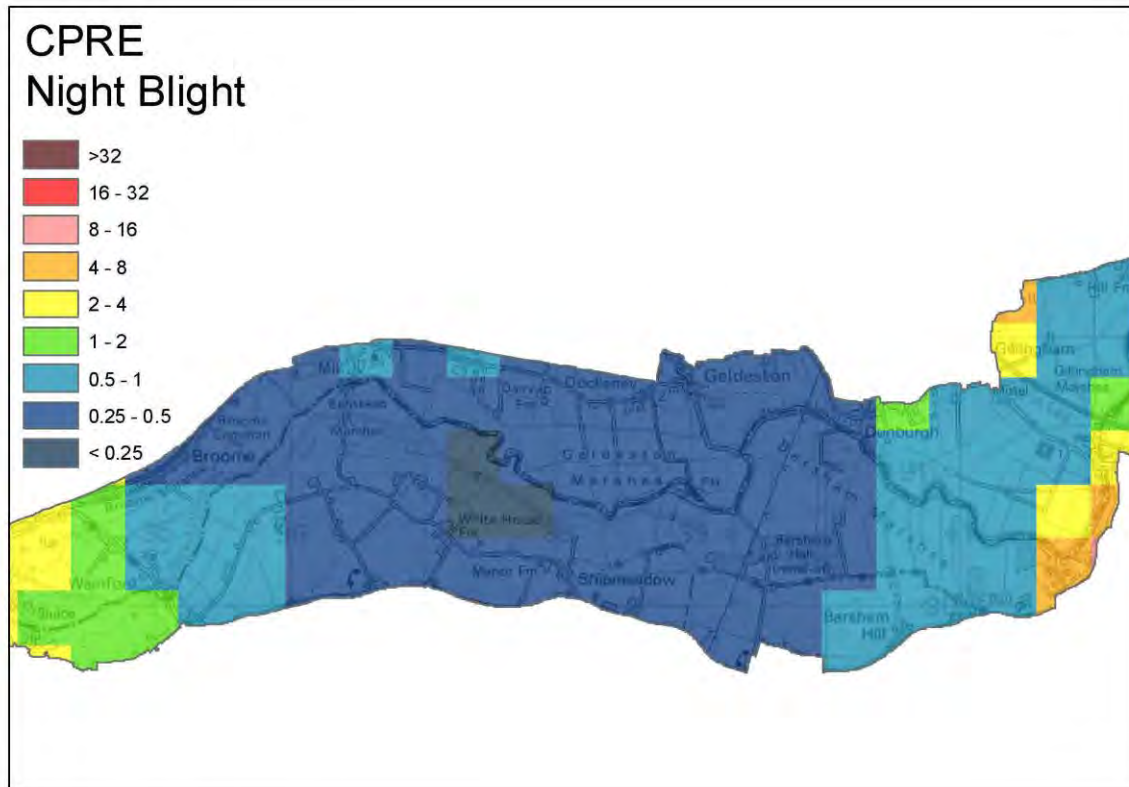
#### Map 4: Broads Dark Sky Survey – Breakdown

The very dark category (>21) does not highlight the area surrounding Geldeston. However if the upper end of the Dark category (20-21) is highlighted (20.95-21) there is a clear area surrounding Geldeston. The reason we are doing this reflects the nearby dark sky survey points being above 21 and that on the night the reading was taken, there was some fog and the pub lights were on; despite all these factors, readings in the area were just under 21. Furthermore, as the Night Blight data at Map 1 shows, this area is dark.



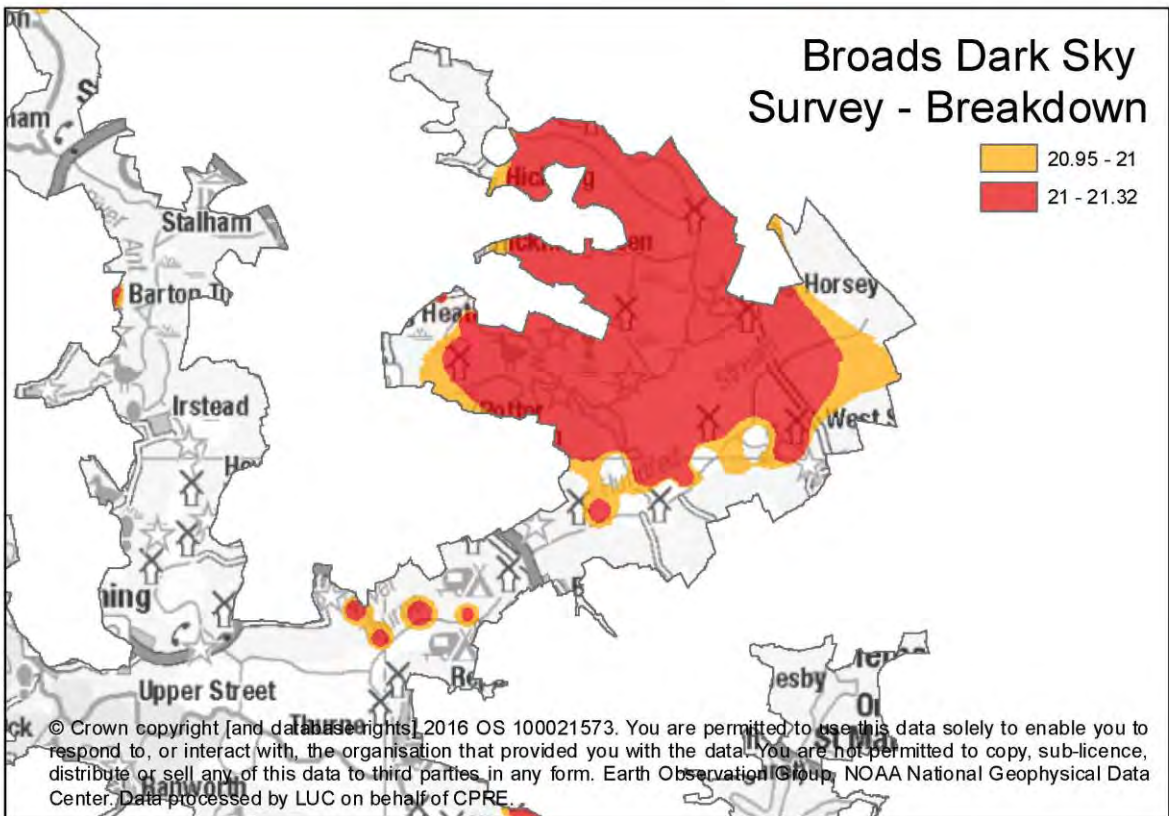
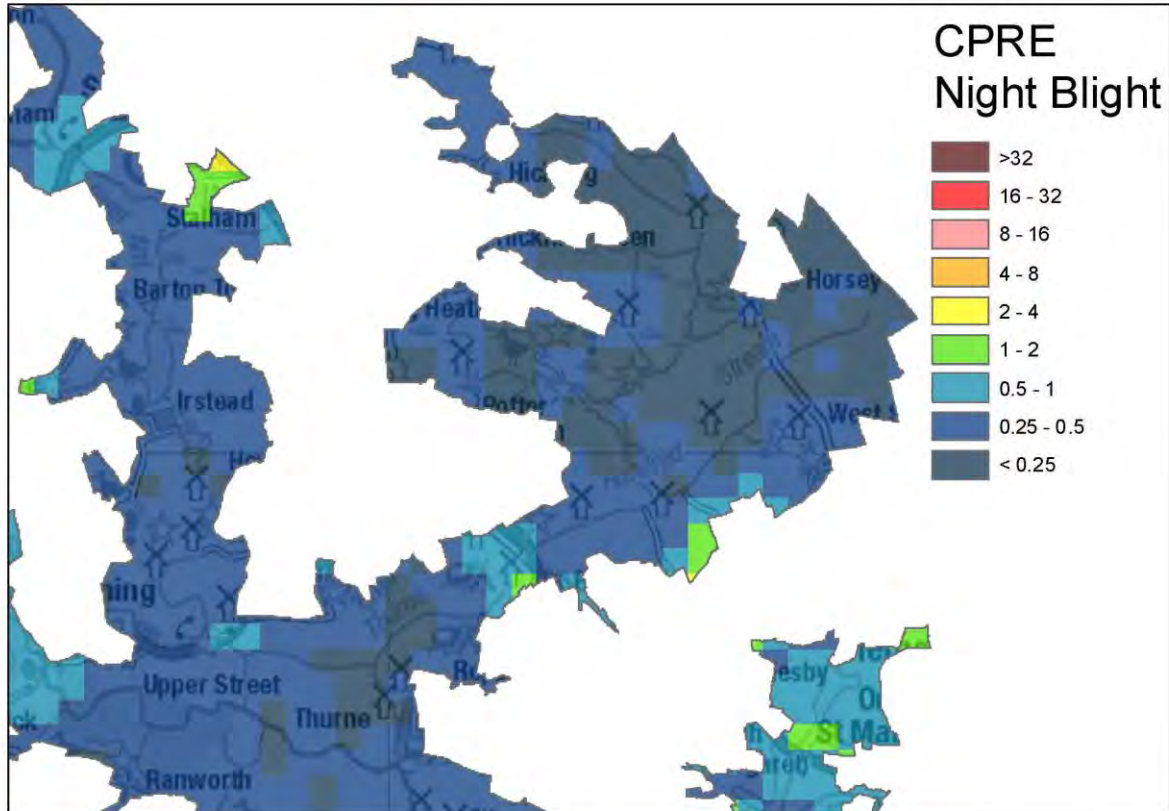
Map 5: Comparing the two datasets – darkest areas

This map shows the darkest areas as identified using the Dark Skies and Night Blight data. Both data sets seem to confirm these areas as being the darkest in the Broads. There are other individual sites that are dark around the Broads, but these areas are larger than individual sites.



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### 3. Summary and conclusion

There seems to be three clear areas in the Broads which both datasets seem to confirm. As such, the proposed light pollution policy will relate to three areas as shown on Map 6. Map 6 is similar to Map 4 but in order to enable the policy to be interpreted on the ground, the boundaries of each zone have been 'snapped' to a feature on the ground (such as hedgerows or roads).

*\*\*\*Final map to follow. But is similar to Map 4\*\*\**

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