



Local Plan for the Broads

Response to the Initial note from the Inspector to the Broads Authority received 1st May 2018

Schedule of proposed changes – March 2018 (LP-SUB2)

1. Can the Authority confirm the status of the above document? Has consultation been carried out in line with Regulation 19 and the Authority's Statement of Community Involvement, and sustainability appraisal undertaken where necessary?
2. Linked to the above, the Authority is requested to confirm how it wishes to proceed with the examination, having particular regard to the two new residential mooring allocations¹ and other significant modifications proposed in the document. In this context, I would draw the Authority's attention to paragraphs 1.2-1.3 and 5.20-5.23 in the 'Procedural Practice in the Examination of Local Plans' (PINS) (2016).

The Schedule of proposed changes has not been consulted on. This document has been submitted alongside the Local Plan.

The approach the Authority has taken regarding submission was agreed with the Planning Inspectorate. Please see email conversation with Bart Bartkowiak on 24 January 2018. On reflection, we called the document 'Proposed Changes' rather than 'main and minor modifications'.

During the pre-submission Local Plan consultation (which ended in January 2018), the Authority received three nominations for sites for residential moorings. In order to inform the response to these nominations in documents LP-PUB4 and LP-PUB5, the Authority undertook its 'usual' methodology for assessing such sites again in January 2018 (see LP-PUB9). This was intended to be a proactive approach to aid the examination of the Local Plan for the Broads.

The Authority would like the examination to continue to ensure a timely adoption of the Local Plan, with the Proposed Changes informing the examination.

Consultation responses

3. Thank you for supplying the consultation response documents (LP-PUB4 and LP-PUB5) which are a useful reference source for the examination. It would be appreciated if you could confirm what the paragraph numbers within the boxes preceding the full response text refer to, as much of the Plan does not have paragraph numbering.

Apologies, this could have usefully been called section/paragraph or have separate columns for paragraph and section. Where the number is a whole number (7, 8,

¹ Noting the work carried out after publication consultation as set out in document LP-PUB9.

15) it refers to a section and where it uses a decimal point (6.1, 7.4) it refers to a paragraph. We also use policy numbers and page numbers and section titles which are all intended to aid navigation around the Local Plan.

4. The Responses Matrix (LP-PUB8) contains a column near the end of the table entitled 'Extra site for consideration'. Could you clarify what this relates to?

These sites came forward through the pre-submission Local Plan consultation. They had not been submitted before. The numbers in the cell refer to the representation number and can be used to cross refer to LP-PUB4 and LP-PUB5. They are as follows:

- *Representation number 23: submitted by 'Broad, D' for up to 6 residential moorings at Ropes Hill Dyke, Horning.*
- *Representation number 225: submitted by 'Evolution Planning' for up to 10 residential moorings at Somerleyton Marina.*
- *Representation number 250: submitted by 'OA Chapman and Son'. It is not clear where this site is and the agent was not instructed by the landowner to represent him. We tried to contact OA Chapman and Son on numerous occasions to get more information with no success.*
- *Representation number 98: submitted by 'St Olaves Marina', for up to 12 residential moorings on the New Cut at St Olaves Marina.*

Other Plans

5. The table on page 18 of the draft Local Plan refers to Neighbourhood Plans in preparation at September 2017. It would be appreciated if you could provide me with any updates to this list.

- [Acle](#) - Adopted by the Broads Authority and by Broadland District Council. This is now in use when determining planning applications in the Acle Neighbourhood Area.
- [Strumpshaw](#) - Adopted by the Broads Authority and by Broadland District Council. This is now in use when determining planning applications in the Strumpshaw Neighbourhood Area.
- [Brundall](#) - Adopted by the Broads Authority and by Broadland District Council. This is now in use when determining planning applications in the Brundall Neighbourhood Area.
- [Salhouse](#) - Adopted by the Broads Authority and by Broadland District Council. This is now in use when determining planning applications in the Salhouse Neighbourhood Area.
- [Oulton](#) - Designated a Neighbourhood Area by Waveney Council and the Broads Authority in December 2014/January 2015.
- [Beccles](#) - Designated a Neighbourhood Area by Waveney Council and the Broads Authority in June 2015.
- [Bungay](#) - Designated a Neighbourhood Area by Waveney Council and the Broads Authority in April 2016.
- [Lound with Ashby, Herringfleet and Somerleyton](#) - Designated a Neighbourhood Area by Waveney Council and the Broads Authority in August 2016.
- [Horstead with Stanninghall](#) - Designated a Neighbourhood Area by Broadland Council and the Broads Authority in August 2016.
- [Worlingham](#) - Designated a Neighbourhood Area by Waveney Council and the Broads Authority in February 2017.
- [Thorpe St Andrew](#) - Designated a Neighbourhood Area by Broadland Council and the Broads Authority in April 2017

- [Wroxham](#) - Designated a Neighbourhood Area by Broadland Council and the Broads Authority in May 2017.
- [Rollesby Neighbourhood Plan](#) - Designated a Neighbourhood Area by Great Yarmouth Borough Council and the Broads Authority in March 2017.
- [Winterton on Sea](#) - Designated a Neighbourhood Area by Great Yarmouth Borough Council and the Broads Authority in August 2017.
- [Hemsby](#) - Designated a Neighbourhood Area by Great Yarmouth Borough Council and the Broads Authority in November 2017.
- [Cathedral, Magdalen and St Augustine's area \(within the City of Norwich\)](#) - consultation on the associated Neighbourhood Forum and Neighbourhood Area runs until 21 March.

6. Could you provide an up to date list of the plan preparation stages reached in each of the local authority areas which fall within the Broads Authority Executive Area.

Council	Core Strategy	Development Management Policies	Sites Allocation Policies	Other DPDs	New Local Plan
Great Yarmouth Borough Council	Adopted 2015.	See end column	See end column	Remaining Borough-Wide Local Plan Policies (2001). Interim Housing Land Supply Policy Adopted 2014.	GYBC is now producing a Local Plan part 2. The Regulation 18 consultation is due this summer.
North Norfolk District Council	Core Strategy and Development Management policies in same document adopted September 2008. Core Strategy update 2012. Following the publication of the National Planning Policy Framework in 2012, the Council considered and approved a revised approach to proposals in the countryside to re-use existing buildings for residential purposes. This revises Policy HO9 of the adopted Core Strategy		Adopted February 2011.	-	NNDC is producing a new Local Plan that will bring all policies into one document. The Regulation 18 consultation is set for early 2019.
Waveney District Council	Adopted January 2009.	Adopted January 2011	Adopted January 2011	Lowestoft Lake Lothing & Outer Harbour Area Action Plan adopted	New Local Plan brings all policies together into one document.

Council	Core Strategy	Development Management Policies	Sites Allocation Policies	Other DPDs	New Local Plan
				January 2012.	Regulation 19 consultation ends 24 May 2018..
Norwich City Council	Joint Core Strategy. Initially adopted 2011 and then following the 'repair' ² adopted in 2014.	Adopted December 2014	Adopted December 2014	-	New Local Plan under development jointly to cover strategic and site allocation policies. Completed first Regulation 18 consultation March 2018.
South Norfolk District Council		Adopted October 2015	Adopted October 2015	Wymondham Area Action Plan adopted October 2015. Long Stratton Area Action Plan adopted May 2016.	
Broadland District Council		Adopted August 2015	Adopted May 2016	Growth Triangle Area Action Plan adopted 2016.	

Policies Map

7. The submitted Policies Map currently consists of a significant number of individual maps, insets and summary maps. It would assist me if the Authority could provide a brief overview of how these maps relate to each other, the reasons for this format, and how the Policies Maps will be presented/amalgamated and linked into the Plan once the Local Plan is adopted.

The Broads Authority Executive Area is a complex shape. Unlike other districts or even National Parks, it is not possible to meaningfully display the polygons showing the allocations on one map, even at the scale suggested.

The best approach we found to show how all the policies relate to each other is to split the area into three and show the policies on three maps. These three maps effectively act as an index to point towards other maps with more detail.

- [Publication version - North East](#)
- [Publication version - North West](#)
- [Publication version - South](#)

² The Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) was adopted on 24 March 2011. Following a legal challenge High Court Judge Mr Justice Ouseley found that those parts of the JCS concerning the North East Growth Triangle (NEGT) should be remitted for further consideration and that a new Sustainability Appraisal for that part of Broadland in the Norwich Policy Area be prepared. The remittal meant that parts of the text, and some associated maps and diagrams, were taken back to the Regulation 19: Publication of a Local Plan Stage (previously known as the 'pre-submission stage'), to be treated as not having been subject to examination and adoption. The remainder of the Joint Core Strategy remained adopted. Following further consultation and an examination in 2013, the inspector found that the proposals for the Broadland part of the Norwich Policy Area were sound, subject to a number of modifications. This led to changes to the Joint Core Strategy being adopted in January 2014.

Individual maps were produced for each settlement/parish to show the allocations in that area in more detail. Inset maps have been used where needed.

We have separate maps to show the allocations and the constraints. To combine all constraints and policies together on the same map would have resulted in a very confusing map that would have been difficult to read. The Broads is very constrained with most of the area at risk of flooding for example (blue on the flood risk maps).

This approach was accepted as a way of displaying the allocations and constraints of the adopted 2014 Sites Specifics Local Plan and we have not received any negative comments on this approach.

We are aware that our districts (in particular Greater Norwich Councils and Waveney District Council) use an interactive mapping approach to aid interpretation. We do have that mapping system internally and we are looking into how it could be used by the public and this is work in progress.

8. Does the Authority have, or is able to produce, a single Policies Map which covers the Broads Area and shows all the proposed site allocations and a range of the key designations? If so could I request a A2/A1 copy for my use.

We can do this, but the GIS Officer has advised that the likely scale of the map will be 1:80000. Whilst this could be possible, we believe this map will be difficult to read. Please advise how you wish to proceed given the answer to question 7. The likely timeframe to produce such a map could be in the region of two to three weeks.

Employment need

9. The fifth bullet on page 3 of the Employment Topic Paper (2017) (EB10) states that 'there is no employment target for the Broads as the evidence in the district-wide studies does not require this.' It would assist me if you could:
- a. provide further clarification/explanation regarding this position, and highlight any relevant sections within the Economic Development Needs Assessments of the constituent Councils.
 - b. outline the reasons why a separate assessment of employment needs for the Broads area over the Plan period has not been carried out?

The District Councils have undertaken an assessment for their entire area including the Broads, but not separating out the Broads. No jobs figures or employment land need were identified for the Broads within those documents.

Economy work had been undertaken at a district level relating to employment needs so to complete separate work for the Broads would have been repeating work. To reflect proportionality in evidence base production, a more local, Broads-specific Employment Topic Paper (EB10) was produced. This employment work was undertaken in-house mainly through desk top research, bespoke surveys with employers in the area and interviews. We involved our Council Economic Development Officers as well. This informed the criteria based policies.

The criteria based employment policy approach, as set out in the Core Strategy and Development Management DPD, was reflected in the Local Plan. The criteria based policies will be used to determine applications relating to employment which would contribute to the wider district's economy.

Here are the details of the reports produced by our districts and some relevant sections of the reports:

Waveney District Council

- Ipswich and Waveney Economic Areas Employment Land Needs Assessment 2016
- <http://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Employment-Land-Needs-Assessment-2016.PDF>
- Identified Waveney District as a Functional Economic Area – including the Broads. Para 1.11
- 82% of Waveney is self-contained. Para 2.20
- Page 112 to 114 summarises the key trends and characteristics and employment land needs and recommendations.
- The Broads area is not allocated a jobs number/need for employment land.

North Norfolk District Council

- Business Growth and Investment Opportunities Study 2015.
- Page iii Table E2 shows that the Broads currently provides tourism opportunities and there are some tourism opportunities that are related to the Broads.
- 3.19 refers to tourism employment being seasonal.
- Page 34, table 12 identifies the Broads as being in the East of North Norfolk sub area. Table 48 page 129 identifies the Broads as a key characteristic to promote.
- 7.2, page 86 identifies the Broads as part of the tourism offer.
- Page 102 discusses boat building: The cluster of boat enterprises around The Broads (both inside and out of North Norfolk's borders) should continue to be supported through the provision of adequate employment land and industrial stock in appropriate locations.
- Page 122 identifies Stepping Stone Ln, Stalham as a site with development potential, but the Broads has not been asked to allocate it.
- The Broads area is not allocated a jobs number/need for employment land.
- NORTH NORFOLK, Housing and Economic Land Availability Assessment (HELAA) Part 2 - Assessment of Employment Land. April 2018.
- Recently released so not included within the Employment Topic Paper.
- Documents not on line currently.
- Some sites assessed are in towns which are partly within the Broads. We are consulted on any applications that are adjacent to our boundary.

Greater Norwich Councils

- Greater Norwich: Employment Land Assessment DECEMBER 2017
- https://gnlp.jdi-consult.net/documents/pdfs_14/greater_norwich-employment_land_assessment- final_submission.pdf
- Some towns/areas that are discussed are partly within the Broads: A47 corridor (page 14), Norwich City Centre (page 23), Loddon (page 45).
- Page 104 and 105 shows that 342Ha of employment land is allocated or has been put forward for consideration through the call for sites, but the need is between 75 and 114 Ha.
- Page 107 and 108 refer to strategic site clusters. None of these are within the Broads, although part of Broadland Business Park (see page 62 for details on this site) and the City Centre are near to the Broads. Page 109 aligns specific sectors with these locations. We are consulted on any applications that are adjacent to our boundary.
- The Broads area is not allocated a jobs number/need for employment land.

Great Yarmouth

- *Employment Land Update November 2012*
- <https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1246&p=0>
- *Page 6 highlights tourism and the port and logistics as important to the local economy. The Broads is a tourist destination and on occasion boats accessing the Broads come through the Port of Great Yarmouth.*
- *Page 24 shows three sites that are within the Broads Authority. One of the sites is partly within the Broads Authority. We were not asked to allocate it for any employment use by Great Yarmouth Borough Council.*
- *The map on page 37 and 38 shows sites and it can be seen that some are adjacent to the Broads. We are consulted on any applications that are adjacent to our boundary.*
- *The Broads area is not allocated a jobs number/need for employment land.*

Housing need and supply

10. What is the housing target for the Broads area over the Plan period, taking account of the Duty to Cooperate Agreement between Great Yarmouth Borough Council (GYBC) and the Broads Authority dated October 2017? Does the agreement commit GYBC to the delivery of 66 (total need) or 39 (residual) units?

It is noted that this is confusing.

The Central Norfolk SHMA (2017) assessed the OAN for the Broads as 286 dwellings.

*The housing target for the Local Plan is **240 dwellings** when we take into account the 46 dwellings Great Yarmouth is committing to.*

This reflects that the Authority have managed to allocate 20 dwellings in the Local Plan in Great Yarmouth Borough. The OAN for the Broads part of the Borough is 66 dwellings. We allocate sites for 20 dwellings in the Local Plan. So effectively Great Yarmouth Borough Council is meeting the remaining 46 dwellings. It just so happens that as shown below, permissions and completions in the Broads mean that the net need that Great Yarmouth Borough Council is committing to for the Broads is 38 dwellings.

The agreement commits GYBC to the delivery of the whole Borough's housing requirement, i.e. including the total need for the Broads Authority of 66 dwellings. Out of the total need number, some dwellings are already completed, or permitted, or allocated. For clarity, here are the updated numbers to date for Great Yarmouth:

- *the OAN is 66*
- *4 dwellings have been completed*
- *20 dwellings have been permitted and are yet to be completed. This includes Hedera House.*
- *20 dwellings are allocated in Great Yarmouth Borough in the Local Plan on 2 different sites. Hedera House (permitted) at 16 dwellings and Stokesby at 4 dwellings. Note that Hedera House will only be counted once in the calculations below. The number of dwellings taken as allocated is therefore 4.*

*So the OAN (66) less completions and permissions (24 including Hedera House) less allocations in the Local Plan (4 at Stokesby) leaves the net need that GYBC have agreed to meet through the Duty to Cooperate agreement as **38 dwellings**.*

The figures in the Duty to Cooperate Agreement with Great Yarmouth Borough Council reflected data up to April 2017 (with 7 dwellings completed or permitted and 20 allocations, giving a residential need of 39 dwellings).

11. The Duty to Cooperate Agreement refers to a Memorandum of Understanding on 'Treatment of Housing and Employment Needs and Delivery in the Broads' between GYBC and the Broads Authority dated February 2014. Could you provide me with a copy of this document and include it in the Examination library.

Noted. This has been sent to the Inspector and added to the Examination Library.

12. The housing trajectory in Appendix K in the draft Plan contains information on windfall rates. However, the residual housing need methodology, as established in the Housing chapter, omits reference to this source of supply. Can the Authority confirm whether or not it proposes to include windfall as a source of supply in the housing trajectory work? If so, how would this affect residual housing need?

On reflection, given the sporadic nature of windfall in the Broads, it would be prudent to not include windfall. This will be addressed in the Housing Supply Topic Paper requested in the next point. Removing this windfall does not affect the residual housing need as set out in question 10.

13. Could I request that the Authority produces a Housing Supply Topic Paper to inform the examination process, which outlines the sources of housing supply over the Plan period, and includes:

- Tables which identify estimated annual phasing rates for each outstanding permission and proposed allocation site. Brief commentary in the phasing tables on delivery progress/planning applications for each of the sites would be useful.
- Commentary regarding the inclusion/non-inclusion of windfall rates, and evidence regarding historical windfall completions.
- An updated housing trajectory graph which reflects the identified annual phasing rates and includes all relevant sources of supply including outstanding permissions. The trajectory should show a totals column for each monitoring year, which is broken down into constituent supply sources by differential colouring/shading, and should be linked to a summary table which set out the sources, breakdown and annual totals. It should also show the annual target rate and cumulative target rate.
- Information on five year supply in the Broads Authority area.

Please see accompanying Housing Supply Topic Paper and Five Year Land Supply Statement.

14. Can the Authority confirm when housing monitoring data for 2017/18 is due to be published, and how it intends to deal with this during the examination process?

Most monitoring data has been gathered. The Authority is awaiting confirmation from Great Yarmouth Borough, North Norfolk and Waveney Councils as they take responsibility for monitoring all completions in their area (including those within the Broads Authority Executive Area). It is anticipated that these will be available within the next few weeks. The AMR is usually published in November at the same time as

our district's AMRs but a draft version could be shared and Planning Committee could agree this sooner, perhaps in June if that would be helpful. Please advise.

Infrastructure

15. Section 4 of the Local Infrastructure Report (LIR) states that it only assesses infrastructure needs arising from the residual 40 dwellings in the Great Yarmouth area. Could I request that the Authority:

- a. Confirms whether this is the case for all types of infrastructure. Some sections of the report, for example water and education, appear to look at the effect of overall growth over the Plan period.

The LIR (EB19) has two functions; one is to assess the needs of the residual housing need (which, as discussed in the LIR, was the residual need of the Great Yarmouth Borough area) and the other to assess the approach to take in the Local Plan regarding different infrastructure needs. As set out at Paragraph/Section 1 of the report, 'This report seeks to summarise the needs and approaches to provision of local infrastructure'.

The LIR assesses many types of infrastructure (as listed in the NPPF at paragraph 162):

- *Transport: This section discusses the approach the Local Plan will take to roads, walking, cycling and public transport. Some specific areas are allocated (like the A47 and also former railway routes) and there are criteria based policies in the Local Plan.*
- *Water: Part of this section provides evidence to justify a policy approach to water usage; the LIR justifies the 110 l/h/d water usage as included in policy PUBDM3. The report also discussed infrastructure constraints and in particular the Knackers Wood Waste Water Treatment Works in Horning where capacity issues affect the potential for employment and residential extensions. This constraint is subsequently included within Policy PUBDM1 and referred to as a constraint in the Site Specific Policies section on page 153.*
- *Energy: Is covered in a separate paper (EB23) which sought to address renewable energy generation and energy efficiency of new build.*
- *Telecommunications: In the case of telecommunications, this section of the LIR is not necessarily related to numbers of houses per se, but rather related to what changes could happen to telecommunications in the future. This section has informed a policy on telecommunications in the Local Plan.*
- *Utilities and Police: The utilities section and police section focus solely on Great Yarmouth Borough and the residual housing need of the Broads in that area.*
- *Waste: The Waste section discusses if the Local Plan is required to change the current policy approach on waste.*
- *Health and social care and Education: The health and education section conclude that no facilities within or adjacent to the Broads need to be extended and that no new facilities are required within the Broads. The need for such new facilities may not necessarily arise as a result of the growth as result of the Broads Local Plan, but could conceivably come about as a result of the growth in our districts. As stated in the Local Plan in section 7.2 – there is a high level of interaction between the facilities and people within the Broads and the facilities and people within the districts. That is to say that the Broads Authority could have been asked by the districts or the service providers to allocate land for extension of existing facilities or the provision of new facilities to aid the wider community.*

- *Flood Risk and Defences and Local Coastal Changes: Coastal change and flood risk affect all types of development in the entire area of the Broads.*
 - *Places of Worship, Local Services (shops, pubs, post offices, etc) and Community Facilities: This section discusses the approach the Local Plan will take to these particular types of infrastructure. The approach includes allocation specific areas as open space as well as criteria based policies which will apply to the entire Broads area.*
- b. Confirms how infrastructure needs arising from total growth in the Broads over the Plan period have been assessed? Does the LIR need to be read alongside infrastructure studies carried out by the constituent district councils to provide a full picture of infrastructure needs for the whole Broads area over the Plan period? If so, it would assist me if the Authority could provide further information on the titles/dates of these documents and highlight any key sections which are particularly relevant.

As stated in our response to question 15a, the LIR (EB19) has two functions; one is to assess the needs of the residual housing need (in the Great Yarmouth Borough area) and the other to assess the approach to take in the Local Plan regarding different infrastructure needs. Paragraph/Section 1 of the report states that 'This report seeks to summarise the needs and approaches to provision of local infrastructure'. The report itself sets the reason out for this: 'It is presumed that all other completions, permissions and allocations (from the 2014 Site Specifics Local Plan) do not result in any extra infrastructure requirements relevant to the Local Plan other than any issues raised at the Planning Application stage'.

In terms of methodology for developing the LIR, an analysis was carried out for each infrastructure type, involving discussions with service providers, consultation with relevant organisations and research, as detailed below:

- *Transport: No issues raised through discussions and consultations with Norfolk County Council. Some specific considerations raised in relation to the site at Stokesby and the new residential moorings nominations/allocations – these are site specific and included within policies where required.*
- *Water: The following documents were assessed to inform the LIR: The Water Stressed Areas Classification (Environment Agency, 2013), Essex and Suffolk Water Resource Management plan (2014), Anglian Water Services Water Resource Management Plan (2014), Anglia District River Basin Management Plan (2009)6.*
- *Telecommunications: based generally on the research undertaken to inform the Norfolk Strategic Planning Framework.*
- *Utilities: No concerns raised when utility providers were consulted as per the Local Plan regulations. The Borough's Infrastructure Study did not raise significant issues for the Broads Local Plan to address.*
- *Waste: Advice sought from colleagues at Norfolk County Council. The Waste Local Plans for Suffolk and Norfolk were checked in relation to the Broads.*
- *Health and social care: The Health Protocol, which was under completion at the time of writing the LIR assesses health infrastructure needs.*
- *Education: Discussions with Suffolk and Norfolk County Council raised no specific needs in the Broads.*
- *Flood Risk and Defences: The SFRAs are now in place. Close liaison and consultation with the Environment Agency throughout the Local Plan process raised no concerns. Prior to the SFRAs, the Environment Agency flood maps for planning were used.*

- *Local Coastal Changes: Shoreline Management Plan 6 has been in place since 2012 and that sets out the approach to coastal changes and the Coast policy of the Local Plan is in conformity with the SMP.*
- *Places of Worship, Local Services (shops, pubs, post offices, etc) and Community Facilities: Other than site specific policies, no infrastructure requirements were put forward by the community or our districts through consultations.*
- *Police: Norfolk Constabulary and Architectural Liaison Officer contacted and provided responses. No concerns were raised relating to the additional growth in Great Yarmouth part of the Broads Authority.*

I confirm that other infrastructure documents are of relevance to the Broads, but none identify specific infrastructure requirements that the Local Plan needs to address. I have listed below the information that is pertinent to the Broads, highlighting the key sections which are relevant.

*For **Norfolk Authorities**, the [LP-SUB10 Norfolk Strategic Planning Framework](#) includes infrastructure needs for the entire county based on the Objectively Assessed Housing Need of the districts. Please note that this section was informed by the [Norfolk County Council Norfolk Infrastructure Delivery Plan](#) (2017).*

- *Page 53 lists Priority Utilities Projects for Promotion which lists the main schemes that are thought to be necessary. Of relevance to the Broads could be Northeast Norwich trunk sewer and North and Northeast Norwich sub stations.*
- *There is an agreement that refers to water efficiency, based on the background water related work that was completed to inform the NSPF: Agreement 17 – Norfolk is identified as an area of serious water stress, the Norfolk Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.*
- *Turning to telecommunications, there is a section of the NSPF from page 56 that addresses this. There is also an agreement: Agreement 19 - To maximise the speed of rollout of 5G telecommunications to Norfolk, the Local Planning Authorities will seek to engage with the telecommunications industry to produce shared guidance on the location of base and booster stations for the 5G network, taking into account material planning considerations. The aim is to get this guidance agreed before the end of 2018 with it potentially being included in emerging Local Plan documents.*
- *For health, the NSPF refers to the Health Protocol which has been agreed by all Norfolk Districts. Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk (2017). [This Protocol](#) provides important background information relating to the needs of the population resulting from development in Norfolk as well as processes to follow to ensure that health continues to be an important consideration when planning and delivering development in Norfolk.*
- *Transport covers both committed projects and priority projects for transportation improvements:*
 - *Committed transport projects are listed at table 11 on page 64. Of particular relevance to the Broads are the A47 Great Yarmouth Junctions.*

- *Priority Road Projects for Promotion are shown at page 66 with the following being of particular interest to the Broads: Great Yarmouth Third River Crossing, A47 Acle Straight dualling, Great Yarmouth Rail Station.*
- *Turning to flooding, the NSPF refers to Great Yarmouth Tidal Defences 2017 onwards (Epoch 2) on page 69. Separate to the NSPF are the SFRAS that have been completed that are relevant to the Broads. These SFRAs includes the Broads. The SFRA flood risk layers are included on the policies maps*
 - [*EB31 Strategic Flood Risk Assessment \(2017\) - Greater Norwich*](#)
 - [*EB32 Strategic Flood Risk Assessment \(2017\) - Great Yarmouth*](#)
 - [*EB30 Strategic Flood Risk Assessment \(2017\) - North Norfolk*](#)

*For the **coastal Authorities** of Great Yarmouth, North Norfolk and Waveney, the Shoreline Management Plan 6 is relevant and this covers the Broads section of coast. <https://www2.north-norfolk.gov.uk/smp6/index.html>. The Coast Policy in the Local Plan (PUBSSCOAST) is in conformity with the SMP.*

Great Yarmouth Borough Council produced their [*Infrastructure Plan 2014*](#):

- *Table 3 of page 36 refers to transport infrastructure required to support the delivery of the emerging Local Plan. This refers to the A47 dualling, roundabouts on the A47, Third River Crossing, train station improvements and local transport infrastructure improvements that may be relevant to the Broads.*
- *With regards to water supply, Essex and Suffolk Water and Anglian Water have indicated that there should not be any foreseeable problems with water supply over the plan period. However, additional consultations will need to be undertaken to support housing allocations in the Development Policies and Site Allocations Local Plan Document with future iterations of the Infrastructure Plan being updated as appropriate. Page 39.*
- *For waste water: Anglian Water has identified a need for infrastructure and/or treatment upgrades to the foul sewerage and surface water network capacity in order to serve proposed growth. They concluded that there is sufficient capacity at Caister Pump Lane wastewater treatment works to serve the proposed new development outlined in the emerging Local Plan. Should all the available capacity be taken up at the water treatment works in the future, then upgrades may be required that could involve seeking consent from the Environment Agency for an increase in the discharge of final effluent to the sea. Page 39.*
- *There are likely to be no future supply issues with gas provision. 33kV and 132kV electricity distribution networks supplying the borough currently have reasonable headroom and as such, the proposed development in the borough should not trigger any upstream reinforcement issues. It is likely that dedicated local substations will be required to supply some developments, the costs of which vary depending on the amount of 11kV cable required to connect to the existing 11kV network. Page 40.*
- *Table 7: Waste and recycling infrastructure required to support the delivery of the emerging Local Plan, page 46 shows no schemes specific to the Broads.*
- *Norfolk Constabulary has determined that the proposed level of growth in the borough will significantly increase demand for policing services and place increased pressure on the existing infrastructure base. Page55.*

- For education, see Table 13: Education infrastructure required to support the delivery of the emerging Local Plan, page 60, which shows no schemes specific to the Broads.
- For health, see Table 14: Healthcare infrastructure required to support the delivery of the emerging Local Plan page 62 which shows no schemes specific to the Broads.

Waveney District Council produced the [Waveney Local Plan Infrastructure Study](#) March 2018. Here are some relevant parts:

- 5.6 There will need to be improvements to the pedestrian and cycle network across the District. This is needed to incorporate any new development into the existing network and to help promote walking and cycling as a sustainable transport method.
- 5.7 The Lake Lothing and Outer Harbour Area Action Plan originally set out plans for new pedestrian and cycle bridges in Lowestoft. One is planned over the railway line at Normanston Park, another is over Lake Lothing at the Brooke Peninsula. The bridges together will provide a connection from the Sustainable Urban Neighbourhood and Kirkley Waterfront Site (Policy WLP2.4 of the Local Plan) to Normanston Park and Oulton Broad North Station.
- 5.8 In Beccles there is a need for a cycle link along Ellough Road to link the town to the industrial estates at Ellough and will be included with the development of policy WLP3.1. There is also a need for a new cycle link between Lowestoft and Hopton.
- 5.15 The Lowestoft Infrastructure Prospectus identifies a need to improve Lowestoft Station to support the local and regional economy. The Station is currently seen as not fit for purpose considering Lowestoft is Suffolk's second largest town, and requires maintenance and improvement. The development of the Station is considered in conjunction with the development of Peto Square (Policy WLP2.3 of the Local Plan).
- 5.16 It is likely that as part of travel planning for larger development sites allocated in the Local Plan, improvements and extensions to local bus services will be required.
- 5.20 The main road project for the District is the Lowestoft Lake Lothing Third Crossing which is still currently in development. The Third Crossing will link Waveney Drive to Denmark Road and Peto Way and is expected to bring significant improvements to traffic issues in the town, helping to deliver the objectives of the Local Plan. The bridge will also reduce the negative effects of traffic around Station Square which undermine regeneration goals for the area. Construction is predicted to begin in 2019/20, with completion coming in 2022.
- 5.21 The Beccles Southern Relief Road which is now under construction will bring significant benefits to Beccles by helping remove heavy goods vehicles traffic through the town and support the growth of employment areas to the south of the town.
- 5.22 The Lowestoft Transport and Infrastructure Prospectus has also provided plans for improvements to Denmark Road which are being further considered once the effects of the Third Crossing are understood.

- *5.23 The Prospectus also specifically mentions the need to facilitate the development of infrastructure within Enterprise Zones which will help with the creation of more jobs within the area. Links to the Port area have received special attention in the Prospectus. Other areas such as Ellough Industrial Estate and Broadway Farm will also need enhancement in terms of access.*
- *Overall, the water cycle study concludes there are no major constraints with respect to water service infrastructure and the water environment to deliver the New Local Plan development, on the basis that strategic water resource options and wastewater solutions are developed in advance of development coming forward. Investment in infrastructure will be required by the water companies serving the District, but these would not affect the current proposed phasing or spatial allocation.*
- *6.2 Of the 21 wastewater recycling centres that will receive more wastewater from the new developments outlined in the Local Plan, only Beccles-Marsh Lane is predicted to need infrastructure upgrades to accommodate development. It is likely that these improvements would be required after 2030.*
- *6.4 Upgrades will be necessary in Beccles and Worlingham to the electricity network. This work is needed to accommodate the additional demand development will place on*
- *15.5 The County Council are monitoring the usage of Household Waste Recycling Centre in Lowestoft and considering options for providing additional capacity within the plan period. This could include remodelling the site or making changes to operational practices in order to increase throughput. Alternatively, a replacement site may be sought either in Lowestoft or elsewhere in the District.*
- *9.7 After consulting with NHS England and the NHS Great Yarmouth and Waveney Clinical Commissioning Group, it was concluded that there would be no need for a new health centre or surgery in the District in addition to the one being provided on the Woods Meadow development.*
- *9.8 In Lowestoft, extensions have already been planned for Rosedale Surgery.*
- *9.9 In Beccles it was also suggested that improvements to local transport networks will need to be considered. This included the improvement of walkways towards the health centre and a bus service.*
- *9.10 The previously mentioned developments at James Paget Hospital, including the improvement of the 23 patient wards to help with patient rehabilitation especially those suffering from mental health illnesses, will also help towards meeting the needs of future development.*
- *Primary school information, 8.19:*
 - *Capacity to accommodate 85 additional pupils at the planned Woods Meadow Primary School in Lowestoft*
 - *Capacity to accommodate 106 additional pupils at Edgar Sewter Primary School and/or Holton St Peter Primary School.*
 - *Capacity to accommodate additional pupils at Barnby and North Cove Primary School.*
 - *Capacity to accommodate additional pupils at Blundeston Primary School.*

- Capacity to accommodate additional pupils at Brampton Primary School
 - Capacity to accommodate 11 additional pupils at Ilketshall St Lawrence School
 - Capacity to accommodate 8 additional pupils at Ringsfield Primary School
 - Potential capacity to accommodate of 34 additional pupils in schools in the vicinity of Southwold and Reydon.
- 8.28 A flexible approach to school expansions should be considered in regards to secondary schools. While there is capacity in most of the schools, at present this does not appear to be sufficient to accommodate the estimated pupil yields. Also, factors such as Bungay Sixth Form moving back to the school campus has meant some of the capacities cannot be determined. Expansions cannot be determined at present and will need to be discussed with Suffolk County Council when the need arises.
 - 8.35 As the three sixth form colleges all cover the entire District, there is no way to split the estimated pupil yields from development into catchment areas.
 - 8.36 Development across the whole District is predicted to produce a pupil yield of 287 new sixth form pupils over the course of the plan period. After consulting with Suffolk County Council, the current provision of sixth form education is considered to be sufficient to meet this need.
 - 10.6 in relation to the Police, there is likely need for a new facility or extensions to existing estates if new facility not forthcoming.
 - For flood risk, whilst the Waveney District Council SFRA covers the Waveney part of the Broads, EA advice is to use the Norfolk SFRAs consistency. The Great Yarmouth and Greater Norwich SFRAs covered the Waveney area.

For **Greater Norwich**, there is a [Greater Norwich Infrastructure Plan](#) (April 2017). In the key infrastructure section (section 3, page 8), there is a high level assessment of infrastructure, with no specific requirements for the Broads Authority identified. Work to inform and assess the emerging Greater Norwich Local Plan has yet to be commissioned. The Greater Norwich Local Plan Team have advised that they will collect evidence on infrastructure needs to address the requirements of paragraph 162 of the NPPF. This work will cover the whole of the OAN for Greater Norwich, both as established by the SMHA and more recently through the Government's standard methodology. They have not yet established the growth strategy so cannot yet quantify the amount of new infrastructure required or where it will be needed. However, they currently anticipate that the work will look at the infrastructure needs of settlements in which an allocation will be made and at individual sites, identifying the infrastructure required to enable the sites to come forward. They have not yet identified the exact timing of the work. It will need to coincide with development of the strategy, and expect that it will be done within the next year.

For the emerging **North Norfolk** Local Plan, no specific infrastructure needs document has been produced at the time of writing.

Potential timescales for the hearings

16. The Authority's response to paragraphs 1 and 2 above will be a key determinant of the potential timescales for the hearing sessions on the Plan. At this stage I can confirm that I am available to undertake hearing sessions in early-mid July 2018 (weeks commencing 2nd and 16th only) or from mid-September onwards.

Noted. The parking space, the main meeting room and a room for your use has been reserved for these weeks. Please note that the main meeting room is not available the afternoon of 6 July (Broads Local Access Forum) and not available Friday 20 July (Planning Committee).