

Broads Local Plan Examination

MATTERS, ISSUES AND QUESTIONS

18 May 2018

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Hearing statements are invited on the Matters, Issues and Questions (MIQs) in this document. When preparing hearing statements, you should have regard to the *Examination Guidance Note* which contains information on the format of hearing statements and the hearings process. The Note and other background documents can be viewed on the Authority's Local Plan examination website at:

<http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/examination-of-the-local-plan-for-the-broads-2018>

The Hearing sessions on the Local Plan are due to commence on **Monday 2nd July 2018**. The draft *Hearing Programme* can be viewed on the Authority's webpage. The MIQs in this document are likely to form the main core of the discussion at the hearing sessions, but there may be some alterations. The detailed agendas will be published nearer the time.

Hearing statements must be received by Friday 15th June 2018 (5pm). If you wish to appear at the hearing session you should **also confirm your attendance with the Programme Officer** by this date. However, please note that only those who have previously made representations relevant to the matters being discussed and are seeking to change the Plan have a right to participate at the hearing sessions. However, the sessions are open for anyone to observe.

Matter 1 – Legal and procedural matters

Issue – Has the Plan been prepared in accordance with statutory procedures and Regulations?

Questions

- a) Has the Authority submitted robust evidence to demonstrate that they have met the duty to cooperate?¹ Are there any outstanding strategic matters?
- b) Has the Plan's formulation been based on a sound process of sustainability appraisal?
- c) Are the likely effects of the Plan adequately and accurately assessed in the Habitat Regulations Assessment (HRA) (2017) (LP-PUB3)? Is the process of seeking project-level HRA from individual schemes, as set out in Policy PUBSP15, robust?

¹ Section 20(5)(c) and Section 33A of the Planning and Compulsory Purchase Act 2004.

- d) Has consultation on the Plan been undertaken in accordance with the Statement of Community Involvement (LP-SUB8) and statutory requirements?
- e) Is Plan preparation in line with the Authority's latest Local Development Scheme?
- f) Does the Plan provide clear articulation regarding the areas covered by constituent District Councils, and allow policies which cross reference to other plans to be effectively applied?

Matter 2 – Vision, objectives and strategy

Issue – Does the vision, objectives and overall strategy in the Plan present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development?

[Chapter 8 and Policies PUBSP10, PUBSP15 part d and PUBDM34]

Questions

- a) Are the vision and objectives suitably framed and do they present a positive framework for the future for the Broads?
- b) Is the Plan's vision and overall strategy consistent with the special status of the Broads and the vision and priorities outlined in Government Circular 2010²?
- c) Should key areas and features be illustrated on a key diagram?
- d) Is the housing spatial strategy in the Plan clearly articulated, justified and in line with national policy?
 - i. How will housing growth be distributed across the Authority area, and to what degree will this reflect settlement sustainability?
 - ii. Is the approach to windfall development, based on four settlements with identified development boundaries, soundly based and sustainable? What other options were considered and why were they rejected?
 - iii. Where settlements lie partly in neighbouring authority areas, is the Broads strategy relating to settlement boundaries consistent with that of adjoining Councils and provides a coherent approach for that settlement?
 - iv. Are the development boundaries for Horning, Oulton Broad, Thorpe St. Andrew and Wroxham and Hoveton appropriately drawn and robust?
 - v. Does Policy PUBDM34 provide an effective framework for determining residential schemes in settlements with development boundaries?
- e) Is the general employment strategy in Policy PUBSP10 justified and robust? Should the Plan identify a jobs growth and/or employment land target? Are there

² English National Parks and the Broads – UK Government Vision and Circular 2010.

any existing sources of evidence on jobs growth that could be used to derive targets³?

- f) Are 'employment uses' clearly defined in Policy PUBSP10 and consistently applied in the Plan? What is the justification for including A1 uses (retail)?
- g) What is the Authority's spatial strategy for economic growth? How will the Plan help to improve the alignment between the locations of workplaces and homes, in line with objectives in the Norfolk Spatial Framework?
- h) What is the Authority's strategy for retail growth? Is there an identified hierarchy of centres? Have retail needs been assessed for the Broads area?
- i) Will the sequential test and impact assessment outlined in Policy PUBHOV5 be applied across the authority area? Is the proposed impact assessment threshold of 500 m2 for Hoveton town centre justified and applicable in all parts of the Broads?
- j) Are there any conflicts or duplication between the draft Broads Local Plan and adopted/emerging Neighbourhood Plans in the Broads Area?
- k) Is the Plan's general approach to new housing, employment and tourism development, as set out in strategic and development management policies, consistent with paragraph 116 in the National Planning Policy Framework (NPPF)?

Matter 3 – Objectively assessed need and the housing requirement

Issue – Is the identified objectively assessed housing need soundly based and supported by robust and credible evidence? Is the overall housing requirement in the Plan justified and consistent with national guidance?

[Policy PUBSP15 part a]

Questions

Objectively assessed need

- a) Do the identified Central Norfolk, Great Yarmouth and Waveney Housing Market Areas (HMA) provide a robust and appropriate basis for assessing housing needs, insofar as they relate to the Broads Executive Area?
- b) Do the locally derived population and household projections in the Central Norfolk Strategic Market Housing Assessment (SHMA) (2017) provide a suitable starting point for establishing objectively assessed housing need (OAHN) in the Broads?

³ Noting that jobs growth forecasts from the East of England Forecasting Model (EEFM) have been used on a proportional basis to derive jobs-led dwelling forecasts for the Broads area, as set out in Appendix 3 in the Central Norfolk Strategic Housing Market Assessment (2017).

[The Authority is requested to provide further detail in their response on the methodology/workings as follows:

- Information on how age profile was applied to population estimates from the 2011 Census.
 - Explain how population estimates for each authority area within the Broads were 'updated' by apportioning 2015-mid-year estimates, and why two large sub-areas were used.
 - Information on how natural change and migration rates were applied, and the data source.
 - Outline the reasons and justification for applying the headship rate from the Central Norfolk SHMA across the whole Broads area, and supply details of the workings]
- c) Is the application of a vacancy and second homes rate of 24.5%, based on Council tax data, justified and robust? What period does this data relate to?
- d) Figure 82 in the SHMA indicates that other factors have been taken into account in determining OAHN, including suppressed household formation rates, employment trends and market signals. What assumptions and judgements have underpinned this process as it relates to the Broads area, and are these soundly based?
- e) Is OAHN clearly defined in the draft Plan, in terms of the whole Broads area and its constituent HMA areas?

The Plan's housing requirement

- f) Is the Authority's housing requirement clearly defined in the Plan, as it applies to the whole Broads area and its constituent HMA areas? Does it take account of the Memorandum of Understanding with Great Yarmouth Borough Council?
- g) Is the provision of part of the Authority's housing requirement outside the Broads area (within Great Yarmouth Borough) in line with paragraph 14 in the NPPF, and supported by evidence which balances the need for development against the special status of the Broads Area and/or particular environmental/landscape constraints in the Broads area that lies within Great Yarmouth Borough? What alternative strategies were appraised, and why were they discounted?
- h) In determining the housing requirement, did the Authority consider whether an uplift should be made to i) provide additional affordable housing? ii) meet additional housing needs arising from higher jobs growth targets linked to the City Deal (as outlined for the Broads in figures 96 and 105 in the SHMA)?

Matter 4 – Housing land supply and delivery

Issue – Is the overall housing requirement deliverable over the Plan period, and can a five year supply of housing be achieved?

[Policy PUBSP15 part a Appendix K housing trajectory]

Questions

- a) Is the Authority's approach to the calculation of land supply robust and based on sound evidence? What is the reason for the non-inclusion of i) a windfall rate, and ii) a lapse rate (relating to outstanding permissions and/or proposed allocations)?

- b) How were potential housing sites identified? Were proposed sites subject to a robust assessment of site suitability and sustainability appraisal? Does the evidence show clear reasons for accepting certain sites and rejecting others?
- c) Are the estimated capacity, delivery and phasing rates for the housing allocations soundly based and justified? (as set out in the Authority's Housing Supply Topic Paper – May 2018).
- d) Has sufficient flexibility been provided in the housing trajectory to ensure that the overall housing requirement over the Plan period is met and exceeded?
- e) Is the Authority's approach to calculating five year land supply robust and in line with national policy and guidance? Should the Plan include reference to the Authority's assumptions and parameters and the five year supply position?
- f) Will a five year supply of housing land be provided on adoption and maintained? Does the Plan allow sufficient flexibility to respond to changing circumstances?

Matter 5 – Other housing requirements

Issue – Have affordable housing needs, traveller needs, boat dweller needs and the housing needs of other groups been satisfactorily assessed and addressed in the Plan, in line with national policy and guidance?

[Chapter 25 – Housing: Policies PUBSP10 part b, PUBDM33, PUBDM35, PUBDM36, PUBDM37, PUBDM38, PUBDM39, PUBDM40, PUBDM41]

Questions

Affordable housing

- a) What is the total net need and expected rate of delivery of affordable housing in the Broads over the Plan period? Will there be a shortfall of supply against need?
- b) Does Policy PUBDM33 provide sufficient clarity regarding the affordable housing requirements, standards and thresholds that will apply?
- c) Is the requirement for schemes of 6-10 dwellings across the Broads area to provide commuted sums towards affordable housing justified?

Travellers

- d) Is the assessment of the accommodation needs of gypsy and traveller and travelling showpeople in the Broads area, as set out in the Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) (2017), justified, robustly based and in line with national policy?
- e) Is the Authority proposing to help meet the need for traveller accommodation identified within adjoining districts? Are proposed changes 68 and 69 (Schedule of Proposed Changes - March 2018) necessary for reasons of soundness?
- f) Does Policy PUBDM35 provide a fair and effective framework for determining traveller accommodation, which is line with national guidance?

Boat dwellers

- g) Is the assessment of boat dweller accommodation needs in the Broads area, as set out in the ANA (2017), justified and robustly based? Is there any overlap between the identified need for permanent residential moorings and OAHN?
- h) How were potential residential mooring sites identified? Were proposed sites subject to a robust assessment of site suitability and sustainability appraisal? Does the evidence show clear reasons for accepting certain sites and rejecting others? How was capacity determined?
- i) Why are a number of boatyards identified in the Plan as potentially suitable for residential moorings, but not allocated for specific mooring numbers or included in the supply figures? (including Policies BRU2, BRU4, HOR6, STA1, TSA2). How were such sites identified and assessed?
- j) What is the Authority's latest position on residential mooring supply over the Plan period? Is there evidence to demonstrate that any shortfall could be met through windfall development? Are additional residential mooring allocations, as set out in Proposed Changes 1 and 2 in the Schedule of Proposed Changes (March 2018), necessary for reasons of soundness, and would the proposed policies provide an effective framework to guide development?
- k) Does Policy PUBDM36 provide an effective framework for assessing proposals for permanent residential moorings? Does criterion a) provide sufficient flexibility/scope to facilitate windfall development? How does the policy fit with the emerging River Wensum Strategy?

Other housing needs

- l) Does Policy PUBDM40 provide an effective framework for determining proposals for elderly and specialist needs housing, with sufficient clarity regarding spatial strategy/location requirements?
- m) Is the Authority's approach to custom/self-build housing, as set out in Policy PUBDM41 and the site allocation policies, justified and effective? What is the definition of 'multi-dwelling sites'?

Matter 6 – Infrastructure delivery

Issue – Does the Plan set out a robust framework for infrastructure delivery which is justified, effective and consistent with national policy?

[Chapter 30 – Planning obligations: Policy PUBDM46]

Questions

- a) Does the Local Infrastructure Report (2016) (EB19) provide a thorough assessment of infrastructure needs, and reflect levels of growth in the Local Plan?
- b) What transport modelling work has been undertaken for the Broads area?

- c) What technical work is being undertaken to investigate flow/capacity issues at the Horning Knackers Wood Water Recycling Centre? Is a programme of works scheduled, and are capacity issues likely to be resolved within the Plan period? What are the implications for site-specific allocations in this area?
- d) Is the approach to developer contributions, as set out in Policy PUBDM46, effective and soundly based?
- e) Does the Authority's evidence demonstrate that the scale of developer contributions and policy burdens will not render development unviable?

Matter 7 – Water, flooding and navigation

Issue – Does the Plan set out a positively prepared strategy and policies for protecting the water environment, dealing with flood risk and facilitating navigation, which are justified, effective and consistent with national policy?

[Chapter 10 – Water and flooding: Policies PUBDM1, PUBDM2, PUBDM3, PUBSP2, PUBDM4, PUBDM5]

[Chapter 24 – Navigation: Policies PUBSP13, PUBDM30, PUBDM31, PUBSP14, PUBDM32]

[Chapter 29 – Safety by the water: Policy PUBDM45]

Questions

- a) Do Policies PUBDM1 and PUBDM2 provide effective guidance for the protection and enhancement of water quality and dealing with foul drainage? Are there any outstanding objections from Anglian Water Services and the Environment Agency?
- b) Are the higher water efficiency standards in Policy PUBDM3 justified on the basis of local need? Has their impact on viability been assessed?
- c) Do the Strategic Flood Risk Assessments covering the Broads provide a suitable evidence base for managing development and flood risk? Is the precautionary approach to flood zone 3b in the Position Statement between the Broads Authority and the Environment Agency (EB33) a suitable interim measure prior to additional modelling being completed? Is the interim position and relevant area clearly explained in Policy PUBDM4 and Appendix M? Are there any implications for the assessment of and/or the selection of allocations in the Plan?
- d) Does Policy PUBDM5 provide an effective framework for dealing with surface water run-off?
- e) Do Policies PUBDM30 and 31 apply to all forms of residential/commercial schemes which also incorporate waterways facilities and/or riverbank stabilisation? What is the definition of 'an established settlement' as referred to in Policy PUBDM31?
- f) Do Policies PUBSP14 and PUBDM32 provide a suitable framework for protecting and increasing the number of visitor/short stay moorings in the Broads? How were the 10%/15% short stay requirements determined, and is there a size threshold?

Matter 8 - Open space, community facilities and health and well-being

Issue – Does the Plan set out positively prepared policies for protecting and enhancing open space, community facilities and health and well-being which are justified, effective and consistent with national policy?

[Chapter 11 – Open space, play and allotments: Policy PUBDM6]

[Chapter 12 – Green infrastructure: Policy PUBDM7]

[Chapter 27 – Visitor and community facilities: Policies PUBSP16, PUBDM43]

[Chapter 32 – Site specific policies: Policies PUBSSPUBS, PUBSSLGS]

[Chapter 28 – Health and wellbeing: Policy PUBDM44]

Questions

- a) Are all existing open spaces, sports fields, play areas and allotments in the Broads captured on the policies map, or have size thresholds/other criteria been applied?
- b) Does Policy PUBDM6 provide an effective framework for protecting and enhancing the provision of open space, play space and allotments?
 - i. Are criteria i), ii) and iii) in section a) justified and in line with paragraph 74 in the NPPF?
 - ii. Where open space, play space or allotments are included in the Regulation 123 lists of CIL Charging Authorities, what standards/contributions will be sought via planning obligations in the Broads part of these areas?

[In its response the Authority is requested to provide i) an overview of current open space standards and assessment documents, and future plans for review in all constituent Councils, and ii) information on CIL Charging Schedules in all constituent Councils, including details of whether open space, play areas and allotments are included in Regulation 123 lists]

- c) Is the Authority's approach to the assessment and selection of Local Green Spaces robust and in line with paragraph 77 in the NPPF? Is Policy PUBSSLGS justified, effective, and consistent with Policy PUBDM6?
- d) Does the Plan provide clarity regarding the location and extent of the local green infrastructure network in the Broads?
- e) Does Policy PUBDM43 provide a clear framework for assessing applications for the change of use or redevelopment of community facilities or services? Is criterion d) justified in the case of shops and other commercial community facilities?
- f) How would Policy PUBSSPUBS, which seeks to protect waterside public houses, operate alongside Policy PUBDM43?
- g) Is the requirement in Policy PUBDM44 for applicants to explain how their developments enhance health and well-being, justified and robustly based? Should this be sought from all sizes of schemes?

Matter 9 – Natural and historic environment

Issue – Does the Plan set out positively prepared policies for conserving and enhancing the natural and historic environment which are justified, effective and consistent with national policy?

[Chapter 14 - Soils: Policy PUBDM9]

[Chapter 15 - Historic environment: Policies PUBSP5, PUBDM10, PUBDM11]

[Chapter 16 - Biodiversity: Policies PUBSP6, PUBDM12]

Questions

- a) Where there is harm/loss to peat soils, is the requirement for biodiversity enhancement to outweigh carbon loss justified, as set out in Policy PUBDM9?
- b) Do Policies PUBSP5, PUBDM10 and PUBDM11 provide an effective framework for conserving and enhancing heritage, which is in line with national guidance? Is the requirement to consider employment, recreation or tourism uses in preference to residential use, as set out in Policy PUBDM11, justified and soundly based?
- c) Do Policies PUBSP6 and PUBDM12 provide an effective framework for protecting and enhancing biodiversity and geodiversity?
 - i. Are local ecological networks clearly identified and mapped in the Plan, in line with paragraph 117 in the NPPF?
 - ii. Is the approach to previously developed/brownfield sites with high open mosaic habitat of high environmental value justified?
 - iii. What is land of 'high environmental value' and how would this be assessed?

Matter 10 – Other environment policies

Issue – Does the Plan set out positively prepared policies for dealing with climate change, promoting renewable energy and enhancing the quality of the built environment which are justified, effective and consistent with national policy?

[Chapter 13 – Climate change: Policies PUBSP3, PUBSP3]

[Chapter 17 – Renewable energy: Policies PUBDM13, PUBDM14]

[Chapter 18 – Landscape character: Policies PUBSP7, PUBDM15, PUBDM16, PUBDM17, PUBDM18, PUBDM19]

[Chapter 19 – Amenity: Policy PUBDM20]

[Chapter 20 – Light pollution: Policy PUBDM21]

[Chapter 26 – Design: Policy PUBDM42]

[Chapter 31 – Other Development Management policies: Policies PUBDM47, PUBDM48, PUBDM49]

Questions

- a) Does the Plan set out a proactive strategy to mitigate and adapt to climate change? Which policies would be effective in this regard?
- b) Is Policy PUBDM13 on energy in line with the Written Ministerial Statement dated 25th March 2015 with respect to technical standards?
- c) Is the approach to wind turbine development in Policy PUBDM14 in line with the Written Ministerial Statement dated 18th June 2015?
- d) Do Policies PUBSP7 and PUBDM15-19 provide an effective framework for protecting and enhancing landscape character which is in line with national guidance?
 - i. How would Policy PUBDM15 operate in conjunction with Policy PUBDM19?
 - ii. Are the settlement fringe areas robustly based and clearly mapped?
 - iii. Does Policy PUBDM16 provide effective guidance on flooding matters associated with land raising?
 - iv. Does Policy PUBDM18 give sufficient recognition to the effect of utilities infrastructure on the historic environment?
- e) Is Policy PUBDM21 on amenity soundly based? How would criterion j) be applied?
- f) Are the different Dark Sky Zones effectively clarified in Policy PUBDM21 and Appendix C? Is criterion a) clearly articulated and justified?
- g) Are criteria h) and k) in Policy PUBDM42 on adaptability and accessibility robustly based and in line with national guidance on optional technical standards? Is there clear evidence on local need, and has their impact on viability been assessed?
- h) Does the Plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of the NPPF?
- i) Is the priority afforded to the conversion of buildings to employment, tourism or recreation and community uses in Policy PUBDM47 justified and soundly based? What is the definition of 'sustainable location' and 'adequate access' as set out in criterion i), and is the criterion effective and justified?

Matter 11 – Transport, the economy and tourism

Issue – Does the Plan set out positively prepared policies for sustainable travel and safe access, and supporting a thriving economy and tourism sector which are justified, effective and consistent with national policy?

[Chapter 21 – Transport: Policies PUBSP8, PUBSP9, PUBDM22, PUBDM23]

[Chapter 32 – Site specific policies: Policy PUBSSROADS]

[Chapter 22 – The Broads economy: (Policy PUBSP10 is covered in Matter 2) Policies PUBSP11, PUBDM24, PUBDM25, PUBDM26, PUBDM25, PUBDM27]

[Chapter 23 – Sustainable tourism: Policies PUBSP12, PUBDM28, PUBDM29]

Questions

- a) Does Policy PUBDM22 provide sufficient clarity on adopted parking standards?
- b) What are the thresholds for seeking Transport Assessments and Transport Statements, as referred to in Policy PUBSSROADS?
- c) Does Policy PUBDM27, in conjunction with PUBSP11, strike an appropriate balance between protecting waterside sites in commercial use and allowing businesses to diversify/relocate? Is a 'waterside site in commercial use' clearly defined? What scale, type and form of employment re-use/diversification would be permitted?
- d) Is the Plan's approach to new employment development and diversification, as established in Policies PUBDM24 and PUBDM26, justified, effective and consistent with national guidance⁴?
 - i. Does Policy PUBDM24 provide sufficient protection for the natural and historic environment?
 - ii. Does Policy PUBDM26 provide clear guidance on the type and scale of uses and the amount of new build development permitted, and in the case of farm shops, the proportion of goods that should be produced on the farm?
- e) Are Policies PUBDM28 and PUBDM29 on tourism and recreation development justified, effective and consistent with national guidance⁵?
 - i. Are the policies in line with paragraph 24 in the NPPF?
 - ii. Is the proportion of new build development sufficiently clarified in criterion v) in Policy PUBDM28?
 - iii. Is the demand test in criterion vii) and the brownfield first approach in Policy PUBDM28 justified?
 - iv. Is the threshold of five bedspaces in Policy PUBDM29 justified?
 - v. Does Policy PUBDM29 only allow the loss of tourism accommodation where change of use to residential use is proposed?
 - vi. Are the requirements relating to static caravans in Policy PUBDM29 consistent with the approach to tourism development in Policy PUBDM28?

Matter 12 – Site-specific policies

Issue – Are the proposed allocations justified, effective, developable/deliverable and in line with national policy?

[Chapter 32]

Questions

Policy PUBBEC1: Former Loaves and Fishes, Beccles

- a) Does the policy provide a robust and deliverable approach which is consistent with Policy PUBDM43? Is there viability evidence which indicates that the public house is capable of retention?
- b) Does the policy provide suitable protection for the historic environment?

⁴ Also see Matter 2k.

⁵ As above.

Policy PUBBEC2: Beccles residential moorings (Hippersons Boatyard)

- a) Is the proposal for five permanent residential moorings suitable and deliverable? What proportion of overall moorings does it represent? Should the proposed number of new moorings be specified in the policy itself?
- b) Does the policy provide sufficient protection for the historic environment?

Policy PUBBRU2: Riverside estate boatyards

- a) Is the proposed development and retention of the boatyard and related uses justified and deliverable? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- b) Is the proposal for up to two permanent residential moorings suitable and deliverable? What proportion of overall moorings does it represent? Should the proposed number of new residential moorings be specified in the policy itself, and captured within the residential moorings supply calculations?

Policy PUBBRU4: Brundall Marina

- a) Is the proposed development and retention of the marina, boatyard and related uses justified and deliverable? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- b) How many permanent residential moorings would be suitable on this site? Should this figure be specified in the policy itself, and captured within the residential moorings supply calculations?

Policy PUBBRU6: Brundall Gardens

- a) Is the proposal for up to two permanent residential moorings on this site suitable and deliverable? What proportion of overall moorings does it represent? Should the proposed number of new residential moorings be specified in the policy itself?
- b) Are these new mooring allocations captured in the supply table in the Addendum to the Residential Moorings Topic Paper (August 2017) (LP-PUB9)?

Policy PUBCAN1: Cantley Sugar Factory

- a) Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?

Policy PUBCHE1: Greenway Marine residential moorings

- a) Is the proposal for five permanent residential moorings suitable and deliverable? What proportion of overall moorings does it represent? Are access/highway issues capable of being resolved?

Policy PUBGTY1: Marina Quays (Port of Great Yarmouth)

- a) Does the policy set out a clear and robust approach for redevelopment of the site? Is there sufficient clarity regarding the scale and type of uses, and the extent to which current uses can be retained, supported by enabling development? Is the policy approach supported by viability evidence?
- b) Can flood risk be effectively dealt with as part of any redevelopment scheme?
- c) Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- d) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- e) How were the site boundaries identified and are they robustly based?

Policy PUBHOR6: Horning - Boatyards etc at Ferry Road and Ferry View Road

- a) Is the proposed development and retention of the boatyard and related uses justified and deliverable? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- b) How many permanent residential moorings would be suitable on this site? Should this figure be specified in the policy itself, and included in the residential moorings supply calculations?

Policy PUBHOV3: Brownfield land off Station Road, Hoveton

- a) Is the proposed A3/A4 use of the former Broads Hotel Cottage and Waterside Rooms sites justified and deliverable? What proportion/scale of retail or residential development may be appropriate as part of any redevelopment scheme? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- b) Is the proposed allocation of the building next to the Kings Head pub as holiday accommodation justified and deliverable?
- c) Does the policy provide suitable protection for the historic environment?

Policy PUBHOV4 – BeWILDerwood Adventure Park

- a) What scale and form of new development in the Park would be supported? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- b) Does the policy provide an effective framework for guiding/assessing future proposals?

Policy HOV5: Hoveton town centre and areas adjacent to the town centre

- a) Is the strategy for Hoveton town centre aligned with North Norfolk District Council's approach for the remainder of the town centre? How does it fit with the strategy for Wroxham?

- b) Is the estimated floorspace requirement of 1,234m² robustly based and capable of delivery in Hoveton town centre as a whole over the Plan period? Is the need for comparison or convenience goods?
- c) Is the Primary Shopping Area (PSA) boundary clearly defined and justified? How would applications for retail uses A1-A5 be dealt with in the areas outside the PSA but within the identified town centre boundary?
- d) Is the impact assessment threshold of 500m² for Hoveton town centre justified and soundly based?
- e) Is the approach to the redevelopment of the identified 'areas adjacent to Hoveton town centre' justified and deliverable? Should the PSA be extended to incorporate these areas?

Policy PUBL0D1: Loddon Marina Residential Moorings

- a) Is the proposal for up to 10 permanent residential moorings suitable and deliverable? What proportion of overall moorings on the site does it represent? Are there exceptional circumstances that justify the proposed allocation, in line with paragraph 116 in the NPPF?
- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- c) Are highway and foul water disposal matters capable of being resolved?

Policy PUBNOR1: Utilities site

- a) What mix and scale of uses are proposed on the site? Is the proposal justified and deliverable? Are there exceptional circumstances that justify the proposed allocation, in line with paragraph 116 in the NPPF?
- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- c) What progress has been made in bringing forward the site for redevelopment? Are landownership, access and flood risk issues capable of being resolved?

Policy PUBOUL1: Boathouse Lane leisure plots

- a) Does the policy provide sufficient recognition of constraints relating to minerals?

Policy PUBOUL2: Oulton Broad, former Pegasus/Hamptons site

- a) What mix and scale of uses have been given planning permission on the site? Does the policy provide a suitable level of detail which reflects the permission? Do exceptional circumstances exist which justify the allocation, in line with paragraph 116 in the NPPF?
- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?

Policy PUBOUL3: Oulton Broad District Shopping Centre

- a) Is the approach in Policy PUBOUL3 consistent with that of Waveney District Council, justified and in line with national policy?
- b) Are the District Centre boundaries clearly defined and robustly based?

Policy PUBPOT1: Bridge Area

- a) What form and scale of improvements/change would be permitted in this area? Does the policy provide clear guidance on the matter? Do exceptional circumstances exist which justify the allocation, in line with paragraph 116 in the NPPF?
- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?

Policy PUBSOL2: Land adjacent to A43 Beccles Road and the New Cut (former Spinnakers restaurant)

- a) What scale of development, including holiday accommodation, is anticipated on this site? Do exceptional circumstances exist which would justify major development, in line with paragraph 116 in the NPPF?

Policy PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)

- a) Is the proposed development and retention of the boatyard and related uses justified and deliverable? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- b) How many permanent residential moorings would be suitable on this site? Should this figure be specified in the policy itself, and included in the residential moorings supply calculations?

Policy PUBSTO1: Land adjacent to Tiedam, Stokesby

- a) Is the proposed housing allocation justified and deliverable? Does the policy provide sufficient detail regarding the scale of the scheme?

Policy PUBTSA2: Thorpe Island

- a) Is the overall strategy for the island in Policy PUBTSA2 justified, effective and soundly based? In particular:
 - i. Does the policy allow for the expansion/extension of existing buildings in the eastern end of the site as part of well-designed upgrades or renewals? If so, what scale/form would be supported?
 - ii. What potential scale of permanent residential moorings would be suitable in the eastern end of the site? Should this figure be identified in the Plan and included in the residential moorings supply calculations?
 - iii. Are 'low key recreation and private amenity space' uses clearly defined, as relating to the central section of the island?
 - iv. Does the policy seek to restrict development in the western end of the island to 25 private moorings in the basin and associated infrastructure

- only? What is the justification for this approach, and why were other uses rejected?
- v. What is the justification for requiring moorings on the western end of the island to be located within the basin?

Policy PUBTHU1: Tourism development at Hedera House, Thurne

- a) What type and mix of tourism uses does the policy seek to secure? What proportion of the site should be retained in short-stay holiday accommodation use, as referred to in criteria i)?
- b) Is the proposal justified and deliverable? Are there exceptional circumstances that justify the proposed allocation, in line with paragraph 116 in the NPPF?
- c) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- d) What development has been permitted on the site by the recent planning permission, and should the housing numbers and other details be reflected within the policy?

Policy PUBSSA47: Changes to the Acle Straight (A47T)

- a) Does Policy PUBSSA47 provide a positive strategy for future improvements to the Acle Straight, which balances the need to protect the special qualities of the Broads against social and economic benefits?
- b) Is the provision of walking, cycling and horse riding routes, as set out in criterion vi), justified and deliverable?
- c) Are there any outstanding objections to the policy from other Council's or statutory bodies, taking account of any changes proposed by the authority? If so, the Authority is requested to produce a Statement of Common Ground with each organisation, which outlines common ground and any remaining areas of disagreement.

Matter 13 - Monitoring

Issue - Does the Plan set out a robust monitoring framework?

- a) Are the monitoring indicators specific and measurable?
- b) Are appropriate systems in place to undertake the required monitoring and to report on the full breath of indicators within an Annual Monitoring Report?
- c) Do the monitoring indicators on housing allow delivery against annual targets and in terms of five year supply to be effectively reported?
- d) Do the indicators provide an effective framework for monitoring town centre development and retail growth across the Broads?