

# Planning Committee

23 June 2023

Agenda item number 9

## Local Plan- Preferred Options- bite size pieces

Report by Planning Policy Officer

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### Summary

This report introduces some new or amended policies that are proposed to form part of the Preferred Options version of the Local Plan. The policies are relating to the vision and objectives, open space, heritage, land raising, excavated material, adverts, Thorpe St Andrew policies, drainage mills and electric vehicle charging points.

### Recommendation

Members' comments on the policies are requested.

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## 1. Introduction

- 1.1. The first stage of the production of the Local Plan is the preparation of the Issues and Options. These were presented to Members in 'bite size pieces' over a number of months, rather than as a complete document of Issues and Options. The production stages of the Issues and Options are now complete and work has begun on the Preferred Options version, which will contain proposed policies. This will also be presented in 'bite size pieces'.
- 1.2. This report introduces some amended or new policies for Members to consider for inclusion in the Preferred Options version of the Local Plan.
- 1.3. It is important to note that until such time as the Local Plan is adopted, our current policies are still in place and will be used to guide and determine planning applications.
- 1.4. Members' comments are requested on the policies and amendments. The policies considered in this report at this Planning Committee are relating to the vision and objectives, open space, heritage, land raising, excavated material, adverts, Thorpe St Andrew policies, drainage mills and electric vehicle charging points.

Author: Natalie Beal

Date of report: 12 June 2023

Appendix 1: Vision, objectives and special qualities

Appendix 2: Open space section of the Local Plan

Appendix 3: Heritage DM policies

Appendix 4: DM17 Land Raising and DM18 Excavated Material

Appendix 5: DM49 Advertisements and signs

Appendix 6: Thorpe St Andrew

Appendix 7: Drainage Mills

Appendix 8: Electric Vehicle Charging Points (New policy)



**Local Plan for the Broads - Review  
Preferred Options bitesize pieces  
June 2023**

**Vision, objectives and special qualities**

**Information for Members**

The vision and objectives were included in the Issues and Options consultation. The comments received and responses are included in this paper. Any changes to the vision and objectives are shown as red strikethrough for removed text and blue underline for added text. The Special Qualities are also included in this section.

**Comments received**

<b>Organisation</b>	<b>Comment</b>	<b>Response</b>	<b>How inform Local Plan</b>
Anglian Water	The Local Plan includes a number of objectives that aim to protect the highly valued natural environment of The Broads, address climate change impacts and conserve and enhance water quality and resources. It is considered that the Sustainability Appraisal (SA) objectives will provide a sound basis for assessment of Local Plan objectives and policy options for the next stage.	Noted.	No further action.
Anglian Water	The strategic objectives of the existing Local Plan include reference to a buoyant and successful economy and supporting a prosperous and sustainable tourism economy. The SA objective SOC5 to maximise opportunities for new/additional employment is compatible with the plan objectives where they underpin the statutory purposes for the Broads Authority.	Support noted.	No further action.
Anglian Water	3.14. We are supportive of the Vision for The Broads regarding biodiversity, nature recovery and meeting the challenges of climate change. Further commentary is included in our responses to the specific sections of the document which address these topics.	Support noted.	No further action.

Organisation	Comment	Response	How inform Local Plan
Anglian Water	<p>3.15. We agree with the proposed changes to the objectives, to support the vision and policies as they emerge. We agree that nature-based solutions should factor in OBJ6 regarding water quality and such solutions also provide benefits for biodiversity and nature recovery, resilience to the impacts of climate change, carbon sequestration, and health and well-being.</p> <p>3.16. We support the proposed inclusion of net zero and adaptation to climate change in OBJ7 given the vulnerability of The Broads to the impacts of climate change.</p>	Support noted.	No further action.
Bradwell Parish Council	We agree with the objectives and also feel the issue of second homes needs to be addressed.	Suggestion about addressing second homes noted.	Consider this comment as produce Preferred Options version of the Local Plan.
Broads Society	With regard to the potential changes to the objectives, the Society has no problem with including specific mention of Dark Skies under Objective 2. There are some concerns about the inclusion of ‘warm, energy efficient homes’ under Objective 9 as it is felt that this should be down to Building Regulations legislation and not Planning legislation.	Concerns noted.	Consider this comment as produce Preferred Options version of the Local Plan.
Broads Society	<p>OBJ14 – potential to refer to the tension between tourism and sustainability?</p> <p>It is important to recognise that as in the response to Question 1, without attracting visitors, and specifically new generational visitors, to the Broads, revenues supporting the eco system that is The Broads will only place pressure on what is possible in the protection of The Broads. It is impossible to react to ‘Tensions between tourism and sustainability’ with an approach of non- approval of planning, of embracing visitors to the area for fear of increased traffic movements, of stopping businesses adapting to market conditions and market requirements.</p>	Concerns noted.	Consider this comment as produce Preferred Options version of the Local Plan.

Organisation	Comment	Response	How inform Local Plan
	<p>Instead, the approach should be collaborative, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism.</p>		
Brooms Boats	<p>Broom Boats believes that Building Regulations should be the foremost advisory for building design and ensuring that appropriate materials and technologies are used relevant to the significant impact environmental effects are having.</p> <p>OBJ14 – potential to refer to the tension between tourism and sustainability?</p> <p>It is important to recognise that as in the response to Question 1, without attracting visitors, and specifically new generational visitors, to the Broads, revenues supporting the eco system that is The Broads will only place pressure on what is possible in the protection of The Broads.</p> <p>It is impossible to react to ‘Tensions between tourism and sustainability’ with an approach of non approval of planning, of embracing visitors to the area for fear of increased traffic movements, of stopping businesses adapting to market conditions and market requirements. Instead, the approach should be collaborative, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism.</p>	Concerns noted.	Consider this comment as produce Preferred Options version of the Local Plan.
Designing Out Crime Officer, Norfolk Police	<p>Agree with OBJ2 the mention of Dark Skies specifically and OBJ9 – could include warm, energy efficient homes – I think this should go further to include ‘safe’ i.e. specifically Secured by Design standard safe in both the physical security of the homes and CPTED (crime prevention through environmental design) principles applied to the development as a whole.</p>	Suggestions to OBJ9 seem logical.	Weave into Objective 9 reference to warm, energy efficient and safe homes.
East Suffolk Council	<p>The Council, earlier in the year, responded to the draft Broads Management Plan and commented that it supports the vision. East Suffolk support the additional objectives as outlined in the consultation document (dark skies, nature recovery, net zero, energy efficient homes, second homes, tensions between tourism and sustainability). Many of these issues link to the context of the Broads Authority area and reflect emerging or recently established national policy which Local Plans should take account of.</p>	Support noted.	No further action.

Organisation	Comment	Response	How inform Local Plan
Historic England	Support. OBJ8 specifically addresses the need to protect, maintain and enhance the historic environment, and is very much welcomed. This strong objective will help positively shape the Plan's strategic policies. Overall the objectives demonstrate an integrated approach to the conservation of the historic environment which sees the interrelationship between conservation and other spatial planning goals recognised within several different policies rather than in isolation. For example, OBJ3 and 14 embody a wider understanding of the historic environment has helped inform these objectives which will also help deliver the conservation and enhancement of the historic environment.	Support noted.	No further action.
RSPB	<p>Is it possible to mention in the Vision or Objectives how these statements are going to be realised, by whom and how progress is going to be monitored and resources applied to achieve them?</p> <p>Is there an opportunity to amend the objectives so they're a little smarter? Suggested subtle changes to consider would be:</p> <ol style="list-style-type: none"> <li>1. For the lifetime of this plan retain the Broads as a regional, national and internationally important landscape asset, valued and respected by people who live and work here and those who visit.</li> <li>2. To create and maintain at least 10 areas and locations which provide true tranquillity, dark skies and wildness and offer a tangible sense of being remote and distant from the day-to-day world</li> <li>3. To protect, maintain where needed and enhanced where feasible the landscape character and setting of the Broads to retain the unique, highly valued, and attractive environment.</li> </ol>	Regarding the vision - the Broads Plan and Local Plan for the Broads as well as other related strategies, are the ways to achieve the vision. Suggestions for amending the objectives noted.	Consider this comment as produce Preferred Options version of the Local Plan.
South Norfolk Council	In broad terms the objectives appear consistent with the NSPF. The key issue for the Broads, as it is elsewhere, is ensuring the plan resolves the difficult balance of protecting and enhancing the environment whilst enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Noted. Representation does not suggest changes or highlight issues.	No further action.
Suffolk County Council	We note the vision sets the Authority's target of achieving 'net zero' carbon by 2040. Suffolk County Council has declared a climate emergency with the aim of achieving net zero by 2030.	Noted.	No further action.

Organisation	Comment	Response	How inform Local Plan
Suffolk County Council	Suffolk County Council supports the potential change to OBJ9 to include reference to warm, energy efficient homes. Good quality housing has a direct relationship with improved health outcomes for residents. We would draw attention to the Marmot Review, (2020) The Marmot Review 10 Years On – Health Equity in England. This review states that ‘poor quality housing harms health and evidence shows that exposure to poor housing conditions (including damp, cold, mould, noise) is strongly associated with poor health, both physical and mental.’	Support noted.	Weave into Objective 9 reference to warm, energy efficient and safe homes.
Suffolk County Council	We would also support the inclusion of a specific reference to archaeology in OBJ8 in addition to the area’s historic environment and cultural heritage.	Agreed.	Weave into Objective 8 reference to archaeology.
Suffolk County Council	In addition, Suffolk County Council would support reference to nature recovery in OBJ4.	Support noted.	No further action.
Woodbastwick Parish Council	Easier access is required to fulfil objective 11	Noted. We have and will be reviewing the Integrated Access Strategy.	Pass on comment to Recreation and Waterways Officer.
Broadland Council	In broad terms the objectives appear consistent with the NSPF. The key issue for the Broads, as it is elsewhere, is ensuring the plan resolves the difficult balance of protecting and enhancing the environment whilst enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Noted. Representation does not suggest changes or highlight issues.	No further action.

## **Vision for the Broads**

The vision is taken from the [Broads Plan 2022](#).

### **Our vision for the Broads National Park is that:**

Biodiversity is at the heart of nature recovery. Our natural environment and the beneficial goods, services and cultural values it provides from food and energy to landscape character and recreation are in good condition, used fairly and sustainably, and valued by society. In particular, the precious nature of plentiful, clean, fresh water as a fundamental resource is understood and respected by all.

We are meeting the challenges of climate change and sea level rise, and the carbon reduction targets of 'net zero' by 2040, with well-maintained soils that retain and increase stored carbon.

Wildlife is flourishing and habitats are maintained, restored and expanded. Land and water are managed in an integrated way, with local and landscape-scale management that creates resilience and space for nature and agriculture, enabling us to adapt to changing environmental, economic and social needs. The area's environmental history is better appreciated through understanding its sediments, rocks and landforms.

The past and present importance of the waterways for navigation, biodiversity and recreation is recognised and cherished, and the asset is protected, maintained and enhanced.

This living, working, 'big skies' landscape is notable for its natural beauty, distinctive local character and historic significance. People of all ages, abilities and circumstances enjoy it as a place to live and work, as a place of escape, adventure, learning and tranquillity, and as a source of national pride and identity. Local communities are active in decisions about their future, and sustainable living is seen in action. There is a buoyant rural economy and a viable, well-used public transport network, and local housing need is being met.

The Broads National Park is forever recognised as fundamental to our prosperity and our mental and physical health and wellbeing, and is forever treasured as a unique and special place that provides a breathing space for the cure of souls.



## Broads Local Plan Objectives (2021 to 2041)

The Local Plan objectives reflect the Vision for the Broads and the area's special qualities and assets. The policies in the Local Plan seek to meet these objectives by 2036 and sustain them beyond that date.

Objective	
OBJ1.	The Broads remains a key national and international asset and a special place to live, work and visit.
OBJ2.	There are areas of true tranquillity and wildness <u>and dark skies</u> , giving a real sense of remoteness.
OBJ3.	The Broads is a unique, highly valued and attractive environment where the landscape character and setting is protected, maintained and enhanced.
OBJ4.	The rich and varied natural environment is conserved, maintained, enhanced and sustainably managed. <u>Nature can recover (more, bigger, better, joined).</u>
OBJ5.	The coastal section of the Broads is used and managed in a beneficial and integrated way for people and wildlife <u>using nature-based solutions.</u>
OBJ6.	Water quality is improved and water is managed using appropriate measures to increase capture and efficiency, prevent pollution and reduce nutrients. Flood risk to people, property and landscapes is managed effectively.
OBJ7.	'Climate-smart thinking' minimises future adverse impacts and makes use of opportunities in an area vulnerable to a changing climate and sea level rise. <u>The Local Plan helps the path to net zero, adaptation and resilience.</u>
OBJ8.	The area's historic environment, <u>archaeology</u> and cultural heritage are protected, maintained and enhanced. Local cultural traditions and skills are kept alive.
OBJ9.	The housing needs of the community are met <u>including safe, warm, energy efficient homes in the right place. The Local Plan addresses the issue of second homes.</u>
OBJ10.	Development and change are managed to protect and enhance the special qualities of the Broads as well as the needs of those who live in, work in and visit the area. The Broads Authority maintains close cooperation with the Local Planning Authorities adjoining its executive area.
OBJ11.	The Broads offers communities and visitors opportunities for a healthy and active lifestyle and a 'breathing space for the cure of souls'.
OBJ12.	There is a buoyant and successful rural economy.
OBJ13.	The Broads is renowned for sustainable tourism and supports a prosperous tourism industry.
OBJ14.	People enjoy the special qualities of the Broads on land and on water. Access and recreation is managed in ways that maximise opportunities for enjoyment without degrading the natural, heritage or cultural resource. Navigation is protected, maintained and appropriately enhanced, and people enjoy the waterways safely.
OBJ15.	The Broads continues to be important for the function, identity and recreation of the local community as well as over a wider area.
OBJ16.	Waste is managed effectively so there is no detriment to the environment.

### **Special qualities of the Broads**

The special qualities of the Broads that the Local Plan seeks to protect or enhance (as appropriate) are well known. The following list is based on public consultation for the Broads Plan, the Broads Climate Change Adaptation Plan and the Broads Landscape Character Assessment. Together, these special qualities help create the distinctiveness of the Broads' landscape.

- a) Rivers and open water bodies ('broads')
- b) Fens, reed beds and wet woodlands
- c) Grazing marshes and dyke networks
- d) Flood plains, estuary and coast
- e) Navigable, lock-free waterways
- f) Special wildlife
- g) Countryside access on land and water
- h) Views, remoteness, tranquillity, wildness and 'big skies'
- i) The people, the visitors, the activities
- j) History: Earth heritage, heritage assets, archaeology, historic structures
- k) Cultural assets, skills and traditions.
- l) People's interactions with the landscape
- m) The settlements
- n) Variety of patterns and textures of the landscape.



**Local Plan for the Broads - Review  
Preferred Options bitesize pieces  
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**Open space section of the Local Plan**

**Information for Members**

We have contacted the six District Councils to check the open spaces that we currently protect in the Local Plan as well as asking them to advise us of any others that may have been identified over the last few years that they wish us to identify and protect. As a result of this, some more open spaces were added which are in Broadland and South Norfolk and Great Yarmouth.

The currently allocated open spaces are detailed in [Open spaces current proposals](#) (pages 8-23).

The additional open spaces proposed are detailed in [Open spaces new proposals](#) (pages 24-36).

Some other areas have been put forward as Local Green Space. The assessment of those spaces and the draft policy will come before Planning Committee.

**Draft policy**

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and [added text](#).

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

1 **Policy PODM7: Open space on land, play space, sports fields and allotments**

2 **1. Existing open space provision** (currently allocated open spaces are [here](#) and newly  
3 proposed open spaces are [here](#))

4 a) Development that would result in the loss of existing sport, recreational ([including play](#)  
5 [space](#)), allotment or amenity open space as identified on the policies maps and  
6 identified by the Authority's constituent district councils in their evidence base will only  
7 be permitted if it can be demonstrated (through a local assessment) that:

8 i) There is an excess of ~~recreational or amenity~~ [the type of](#) open space [to be affected by](#)  
9 [the development/proposal](#) in the catchment area (in and out of the Broads) and the

10 proposed loss will not result in a current or likely shortfall during the plan period; or

11 ii) The proposal is for ancillary development on an appropriate portion of the open space  
12 which enhances the recreational facilities and their setting; or

13 iii) The open space which would be lost as a result of the proposed development would be  
14 replaced prior to the commencement of the development by an open space of  
15 equivalent or better quality and equivalent or greater quantity, in an equally accessible  
16 and convenient location subject to equivalent or better management arrangements  
17 which continue to meet the needs of the existing community; and

18 iv) The proposal would not cause significant harm to the amenity or biodiversity value of  
19 the open space.

20 b) [Proposals that improve the amenity or biodiversity value of the open space in an](#)  
21 [appropriate way will be supported.](#)

22 **2. New open space provision**

23 a) The Broads Authority will have regard to the approach and/or standards set by the  
24 relevant constituent district council.

25 b) Any contribution will need to be towards a specific deliverable scheme, in consultation  
26 with the relevant parish or district council and having regard to the developer  
27 contributions policy in this document. The contribution will be required to name a  
28 specific scheme (site and type of provision).

29 c) Open space provision may also be required to reduce recreation pressure on sensitive  
30 designated wildlife sites.

31 d) [New open space provision will need to provide biodiversity enhancements in an](#)  
32 [appropriate way in line with policy PODMx on the Natural Environment.](#)

33 e) [Any lighting associated with open space will need to be designed in line with policy](#)  
34 [PODMx on Dark Skies.](#)

35 **3. Cemeteries and burial grounds**

36 a) Development proposals for new cemeteries and burial grounds that comply with other  
37 relevant policies will be permitted where they:

38 i) Are subject to a prior groundwater protection risk assessment in accordance with  
39 Environment Agency Guidance: [Cemeteries and burials: groundwater risk assessments](#)<sup>1</sup>

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<sup>1</sup> [Cemeteries and burials: groundwater risk assessments - GOV.UK \(www.gov.uk\)](#)

- 40 ~~Assessing Groundwater Pollution for Cemetery Developments~~ (or successor document  
41 or advice);
- 42 ii) Are appropriately sited in a sustainable location;
  - 43 iii) Are designed to make the most of opportunities to improve and/or create new  
44 biodiversity, habitats and green infrastructure; and
  - 45 iv) Will have no adverse impact on controlled waters including groundwater and surface  
46 water.

47 Reasoned Justification

48 The provision of public open space, sports fields, play space, and allotments is essential in  
49 promoting active living and providing important physical, mental, and social health and  
50 wellbeing benefits for the community. The Authority therefore considers it important to  
51 retain open spaces, including children’s play space and sports facilities, which are valued by  
52 local communities and/or add to the local character, unless a suitable alternative can be  
53 provided, and to create new open spaces within or close to housing developments that are  
54 safe and accessible for all members of the community. This policy sets criteria for assessing  
55 proposals relating to these land uses.

56 Because each of the Authority’s constituent councils assesses its entire area - including that  
57 part which is the Broads - in relation to the need for these uses, it is appropriate and  
58 reasonable to have regard to their approach, which may reflect standards in their Local  
59 Plans and other documents. Please contact the Broads Authority for advice regarding where  
60 to find the Local Plan policies of our districts. A summary of the standards and thresholds  
61 that were in place at the time of adoption of this Local Plan can be found at Appendix D.  
62 *<<to follow with the final Preferred Options document>>.*

63 Some of the Authority’s constituent councils have adopted the Community Infrastructure  
64 Levy (CIL) and play, allotments, and open space are part of the charging schedule. There is  
65 no CIL charged by the Broads Authority and it therefore relies on S106 agreements ~~(to which  
66 pooling restrictions apply at the time of writing, although this position may change, whereby  
67 only five contributions can be sought towards generic types of infrastructure, are now in  
68 place)~~ to provide these.

69 The Authority will liaise with the relevant constituent council regarding ongoing  
70 management of the space. Some Districts may not adopt and maintain open space and the  
71 developer may need to address the maintenance responsibility.

72 Any assessments required in relation to open space provision must look at the entire  
73 catchment of a facility (as facilities such as playing fields often serve users beyond the  
74 immediate settlement they are located in), including that part of the settlement outside of  
75 the Broads.

76 Where any loss of open space, play, and allotments is relocated, it is important that it still  
77 meets the needs of the existing community and the new development, unless it is clearly  
78 demonstrated that the existing open space in question is surplus to requirements.

79 Cemeteries and burial grounds are a much valued and sensitive type of green infrastructure  
80 asset. All proposals for new cemeteries and burial grounds should be in a sustainable  
81 location with good links to suitable access networks. The development proposals should  
82 have due regard to the character of the surrounding areas, especially to the special  
83 qualities, and retain any existing landscape features such as hedges and trees. Any  
84 opportunities to improve or create new biodiversity, habitat, and green infrastructure  
85 should also be taken. It will be necessary to demonstrate that the proposed cemetery will  
86 not have an adverse impact on ground or surface water.

87 The design of any open space and its integration into a proposed scheme, streetscape and  
88 landscape is an important consideration. Larger facilities have the potential to adversely  
89 affect the local landscape character through a change in land use and landscape patterns,  
90 through the introduction of more urban features and additional clutter. Design standards  
91 and experience of the relevant council will be applied.

92 The maps in the Open Space Map Bundle show areas of open space assessed by our  
93 constituent district councils. While they assessed their entire district, including that part  
94 which is the Broads, they only allocated open space in their Local Planning Authority area.  
95 Working with its districts, the Authority has, at the time of writing this Plan, allocated the  
96 open space within these assessments that falls within its Executive Area. Many of our  
97 districts intend to update their assessments as part of their Local Plan production, and we  
98 will defer to the most up-to-date open space assessment.

99 The following policy, **DM8** relates to Green Infrastructure and may be of relevance to  
100 proposals. [So too will policy \*\*PODMx\*\* on the Natural Environment and policy \*\*PODMx\*\* on Dark  
101 Skies.](#)

## 102 **Reasonable alternative options**

103 a) The original policy, with no amendments.

104 Given the importance of open spaces in the Broads for the health and landscape and  
105 townscape benefits, not to have a policy is seen as an unreasonable alternative.

## 106 **Sustainability appraisal summary**

107 The two options (of the amended policy and the original policy) have been assessed in the  
108 SA. The following is a summary.

A: Keep original policy	4 positives. 0 negatives. 0 ? Overall, positive.
B: Preferred Option - amend policy.	5 positives. 0 negatives. 0 ? Overall, positive.

## 109 **How has the existing policy been used since adoption in May 2019?**

110 According to recent Annual Monitoring Reports, the policy has been used and applications  
111 have been determined in accordance with the policy.

## 112 **Why have the alternative options been discounted?**

113 The amendments to the original policy fundamentally reinforce the importance of open  
114 spaces and associated issues to consider like how they can be improved for biodiversity and  
115 the impact of lighting. These amendments will help the open spaces contribute to the  
116 natural environment and ensure the health and wellbeing of the community.

117 **UN Sustainable Development Goals check**

118 This policy meets these [UN SD Goals](#):

**3** GOOD HEALTH  
AND WELL-BEING



**11** SUSTAINABLE CITIES  
AND COMMUNITIES



119 **Sustainability Appraisal**

120 SA objectives:

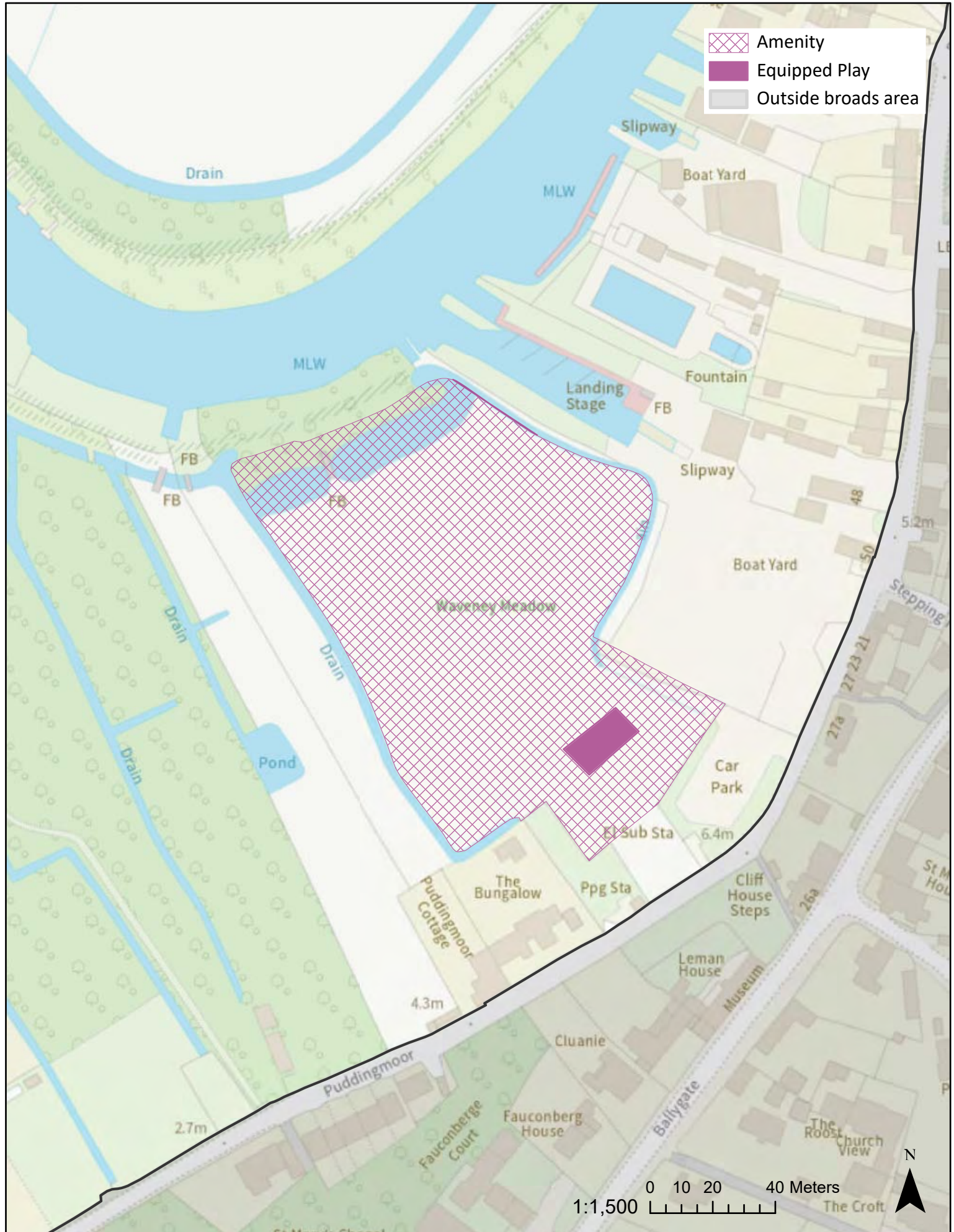
- 121 • ENV1: To reduce the adverse effects of traffic (on roads and water).
- 122 • ENV2: To safeguard a sustainable supply of water, to protect and improve water quality  
123 and to use water efficiently.
- 124 • ENV3: To protect and enhance biodiversity and geodiversity.
- 125 • ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and  
126 towns/villages.
- 127 • ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- 128 • ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk  
129 and coastal change.
- 130 • ENV7: To manage resources sustainably through the effective use of land, energy and  
131 materials.
- 132 • ENV8: To minimise the production and impacts of waste through reducing what is  
133 wasted, and re-using and recycling what is left.
- 134 • ENV9: To conserve and enhance the cultural heritage, historic environment, heritage  
135 assets and their settings
- 136 • ENV10: To achieve the highest quality of design that is innovative, imaginable, and  
137 sustainable and reflects local distinctiveness.
- 138 • ENV11: To improve air quality and minimise noise, vibration and light pollution.
- 139 • ENV12: To increase the proportion of energy generated through renewable/low carbon  
140 processes without unacceptable adverse impacts to/on the Broads landscape
- 141 • SOC1: To improve the health and wellbeing of the population and promote a healthy  
142 lifestyle.
- 143 • SOC2: To reduce poverty, inequality and social exclusion.
- 144 • SOC3: To improve education and skills including those related to local traditional  
145 industries.
- 146 • SOC4: To enable suitable stock of housing meeting local needs including affordability.
- 147 • SOC5: To maximise opportunities for new/ additional employment
- 148 • SOC6: To improve the quality, range and accessibility of community services and  
149 facilities and to ensure new development is sustainability located with good access by  
150 means other than a private car to a range of community services and facilities.
- 151 • SOC7: To build community identity, improve social welfare and reduce crime and anti-  
152 social activity.
- 153 • ECO1: To support a flourishing and sustainable economy and improve economic  
154 performance in rural areas.
- 155 • ECO2: To ensure the economy actively contributes to social and environmental well-  
156 being.
- 157 • ECO3: To offer opportunities for Tourism and recreation in a way that helps the  
158 economy, society and the environment.



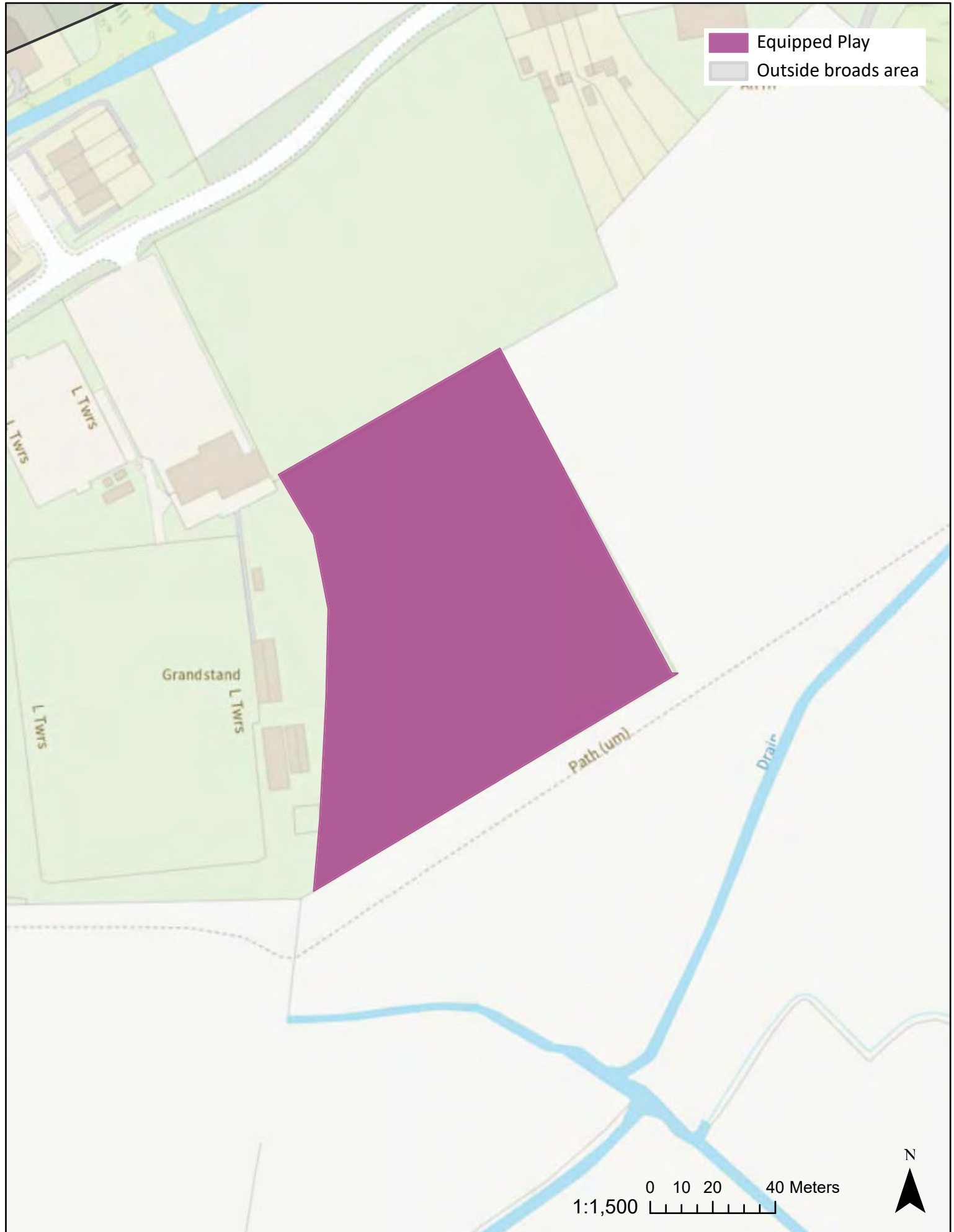
159 **Assessment of policy**

	A: Keep original policy		B: Preferred Option - amend policy	
ENV1				
ENV2				
ENV3	+	Policy talks of enhancing the biodiversity value.	+	Policy talks of enhancing the biodiversity value.
ENV4	+	The various types of open spaces are part of the land and town scape.	+	The various types of open spaces are part of the land and town scape.
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11			+	The policy refers to dark skies and appropriate lighting.
ENV12				
SOC1	+	Open space and play enable people to be active.	+	Open space and play enable people to be active.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6	+	The policy requires any replacement open space to be in as convenient location as the current. It also says that cemeteries need to be sustainable located.	+	The policy requires any replacement open space to be in as convenient location as the current. It also says that cemeteries need to be sustainable located.
SOC7				
ECO1				
ECO2				
ECO3				

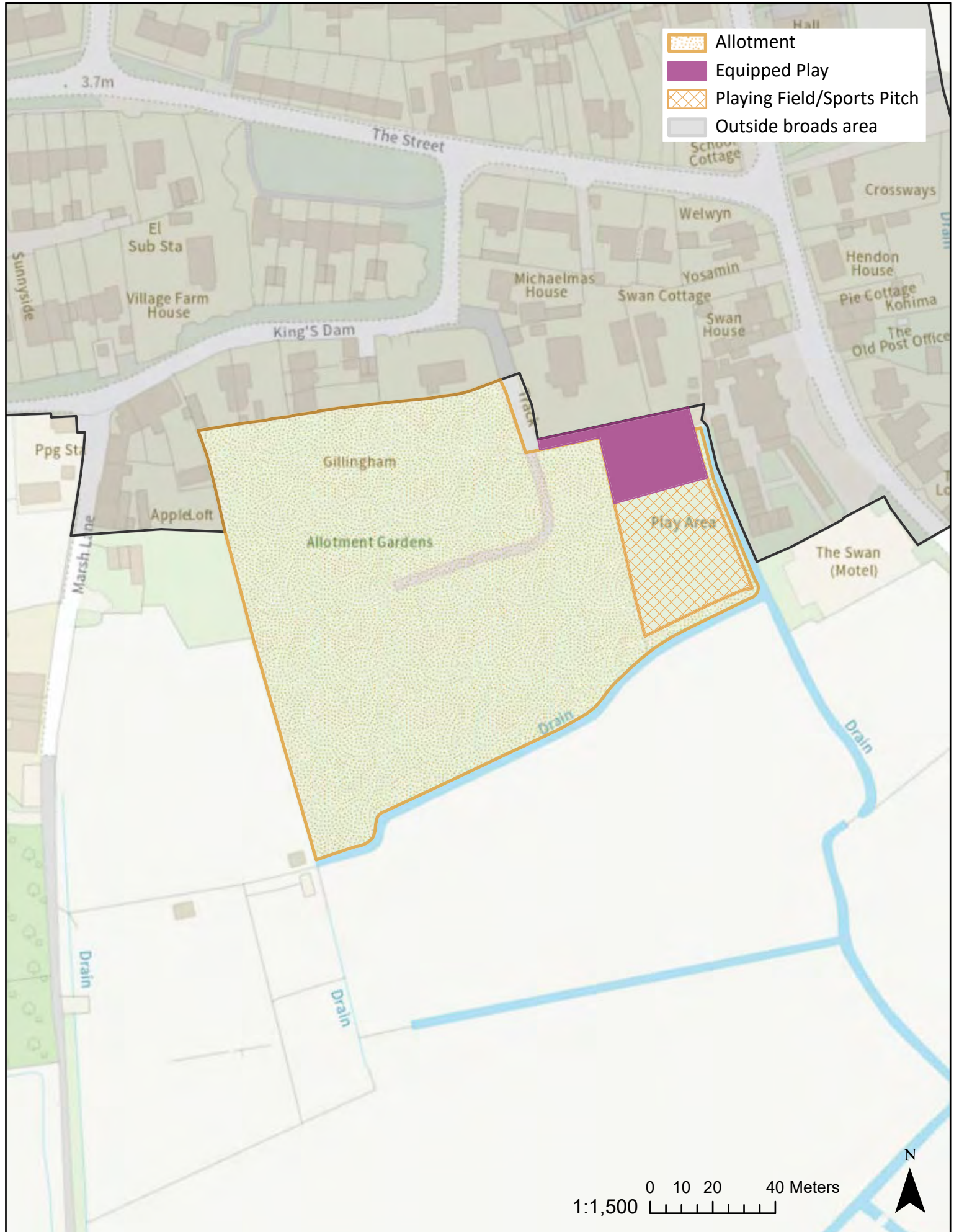
# Current Open space: Waveney Meadow



# Current Open space: Ditchingham



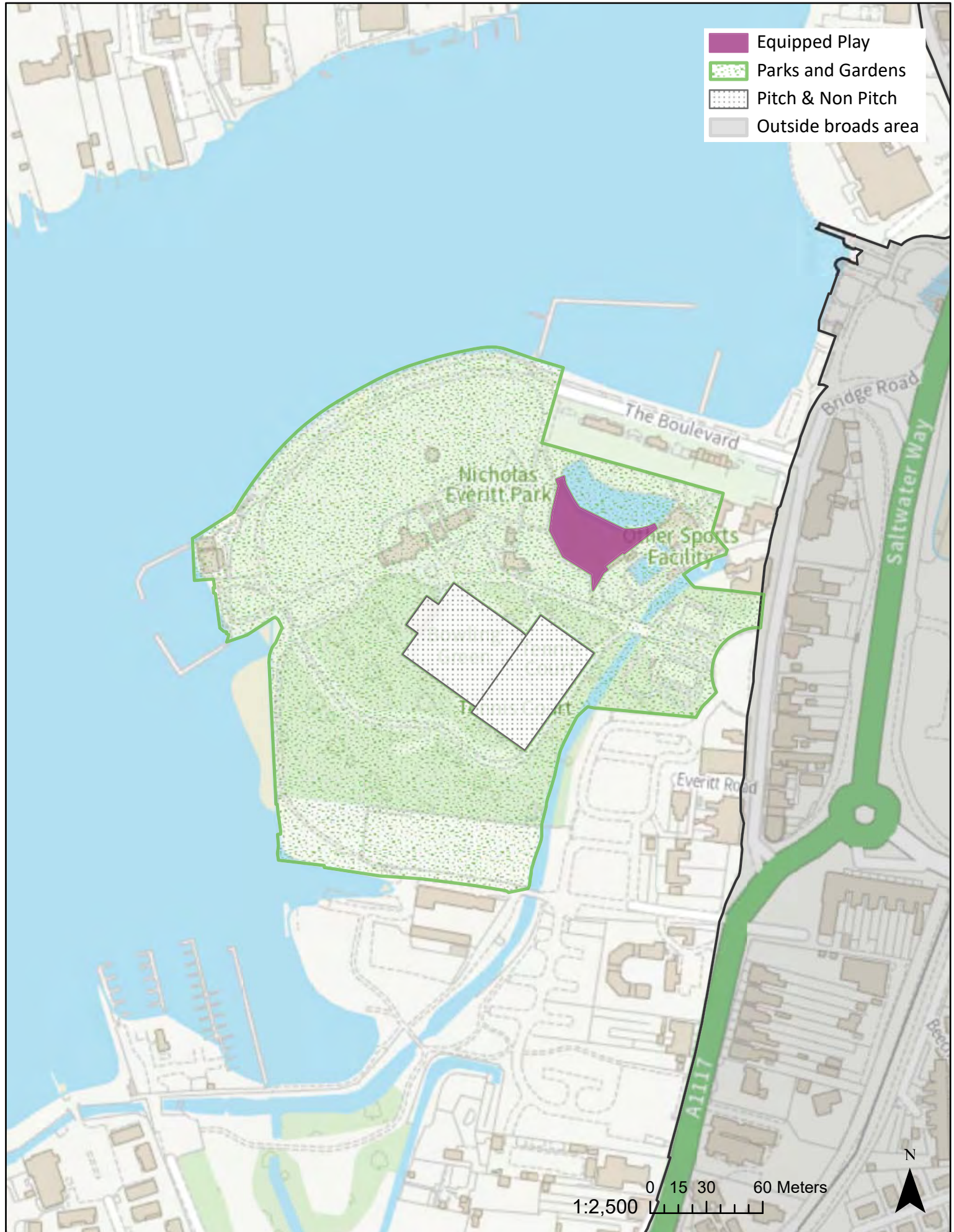
# Current Open space: Gillingham



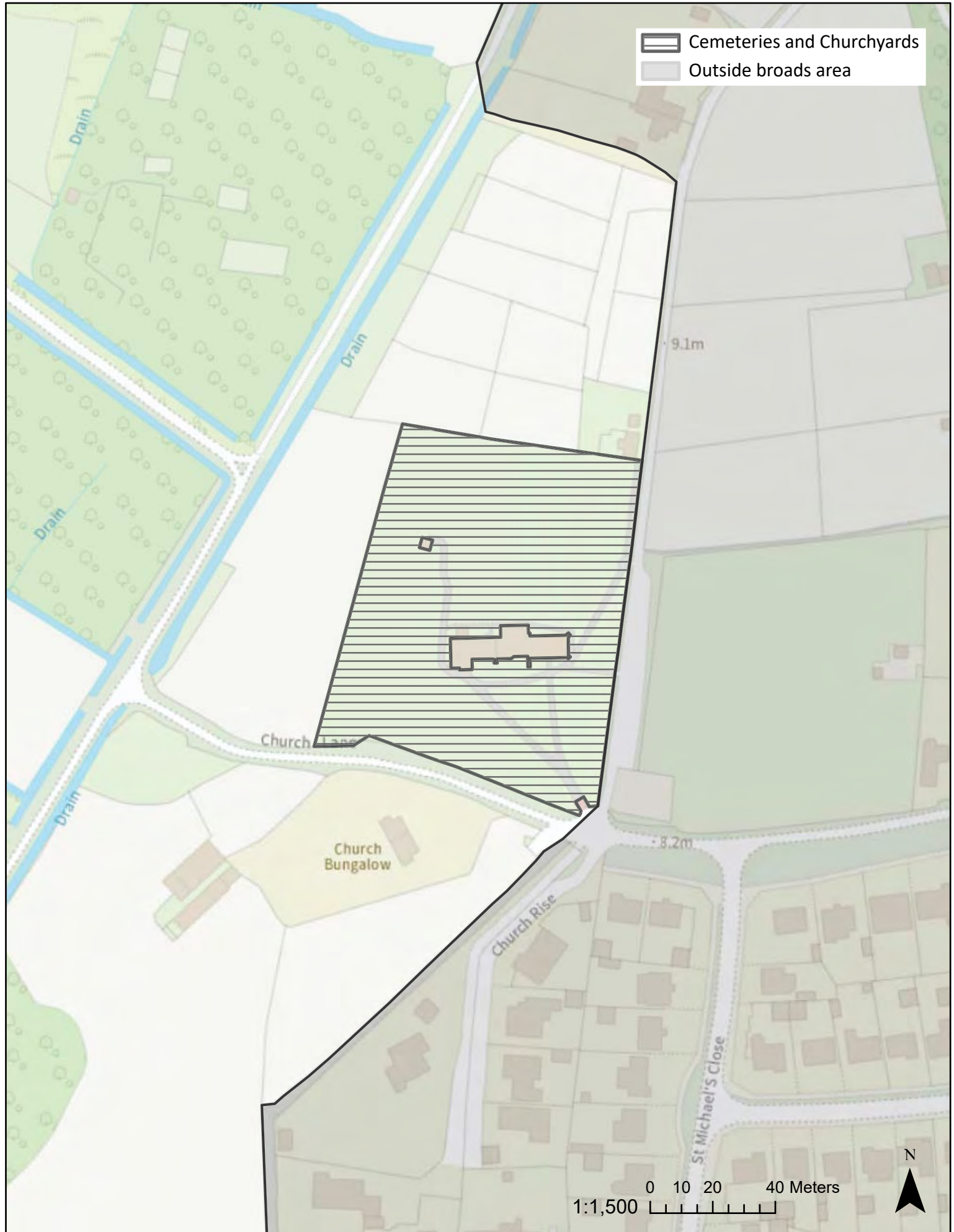
# Current Open space: Ellingham



# Current Open space: Nicholas Everitt Park



# Current Open space: St Michael's Church, Church Lane, Oulton Broad

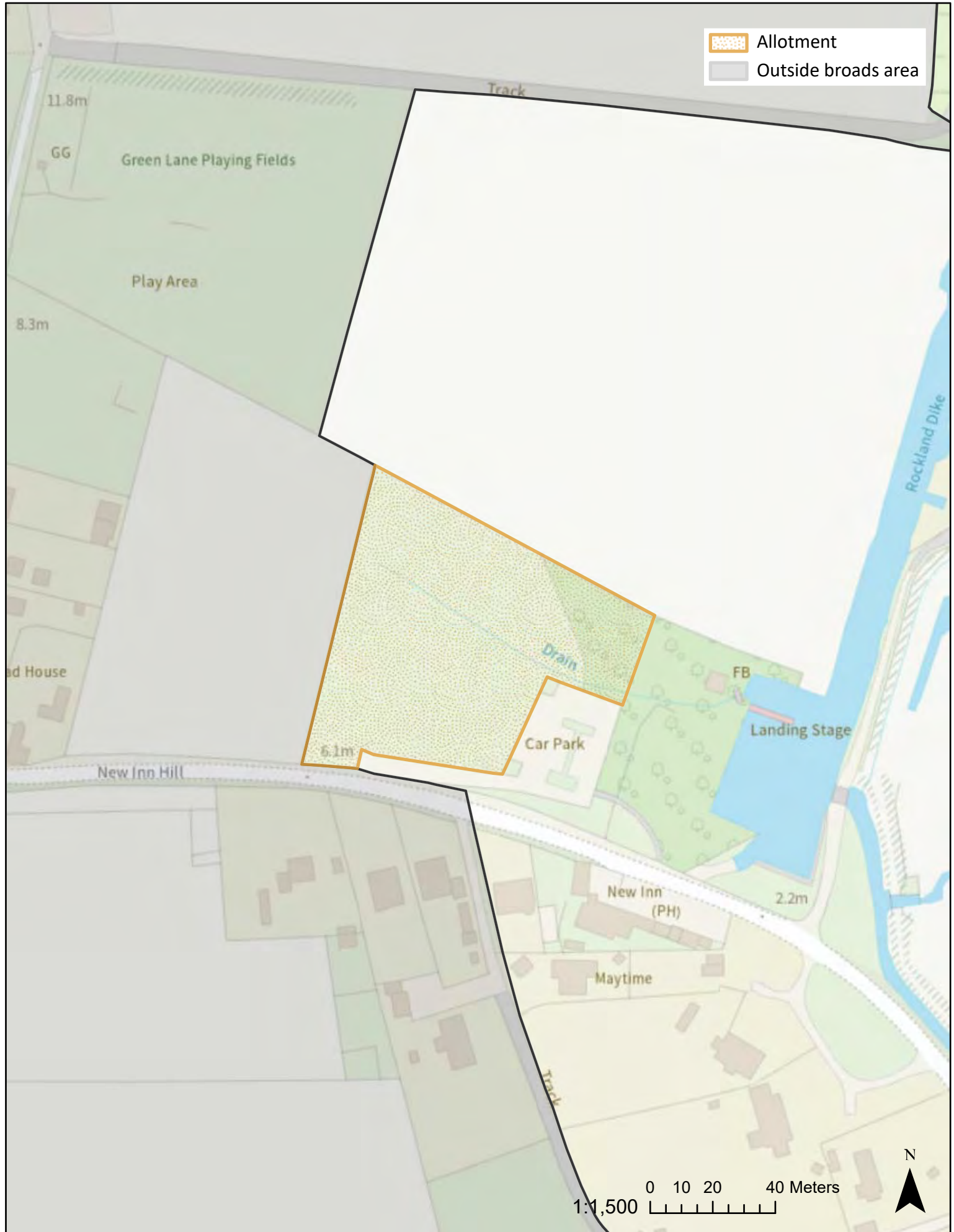


# Current Open space: Cantley

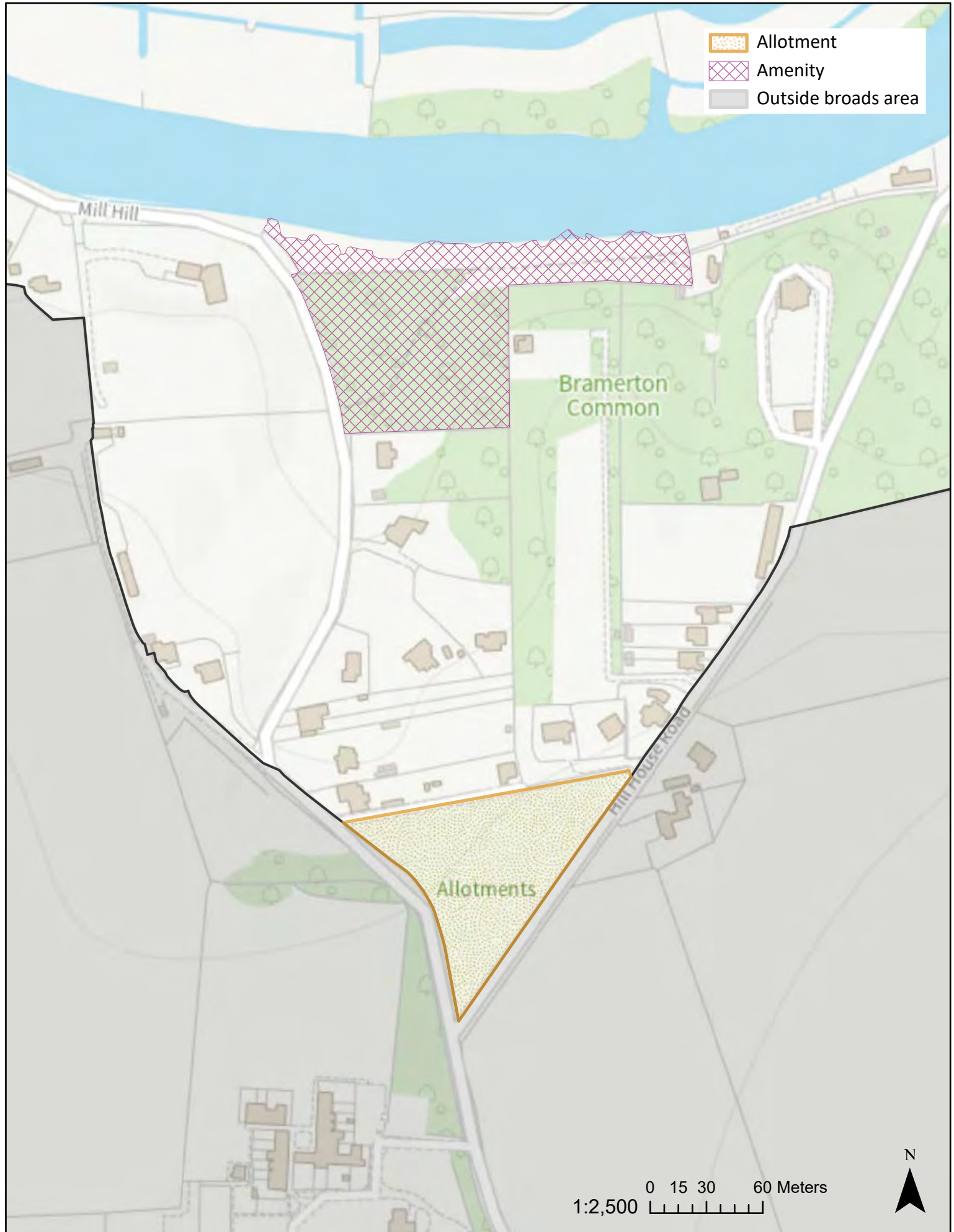




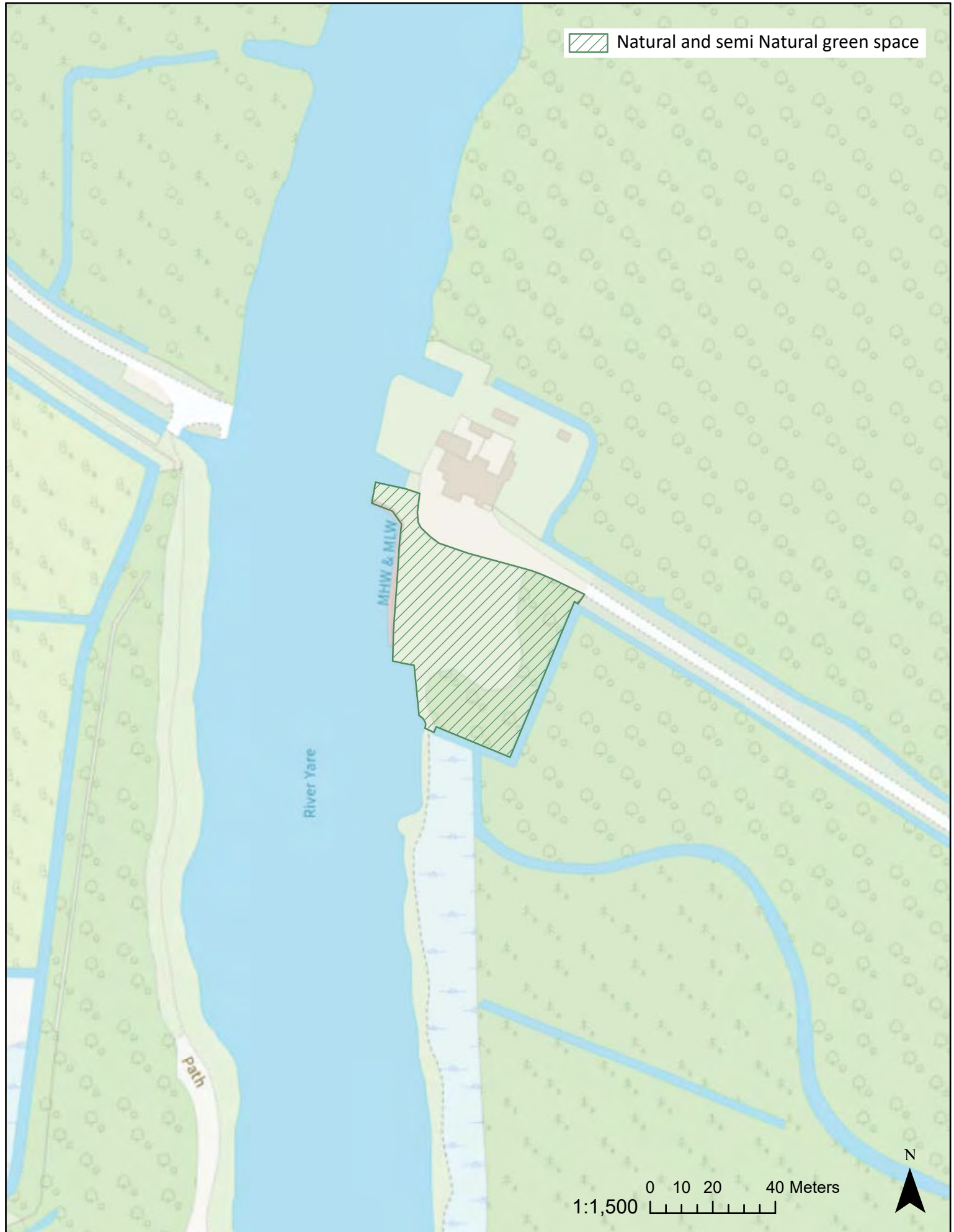
# Current Open space: Rockland



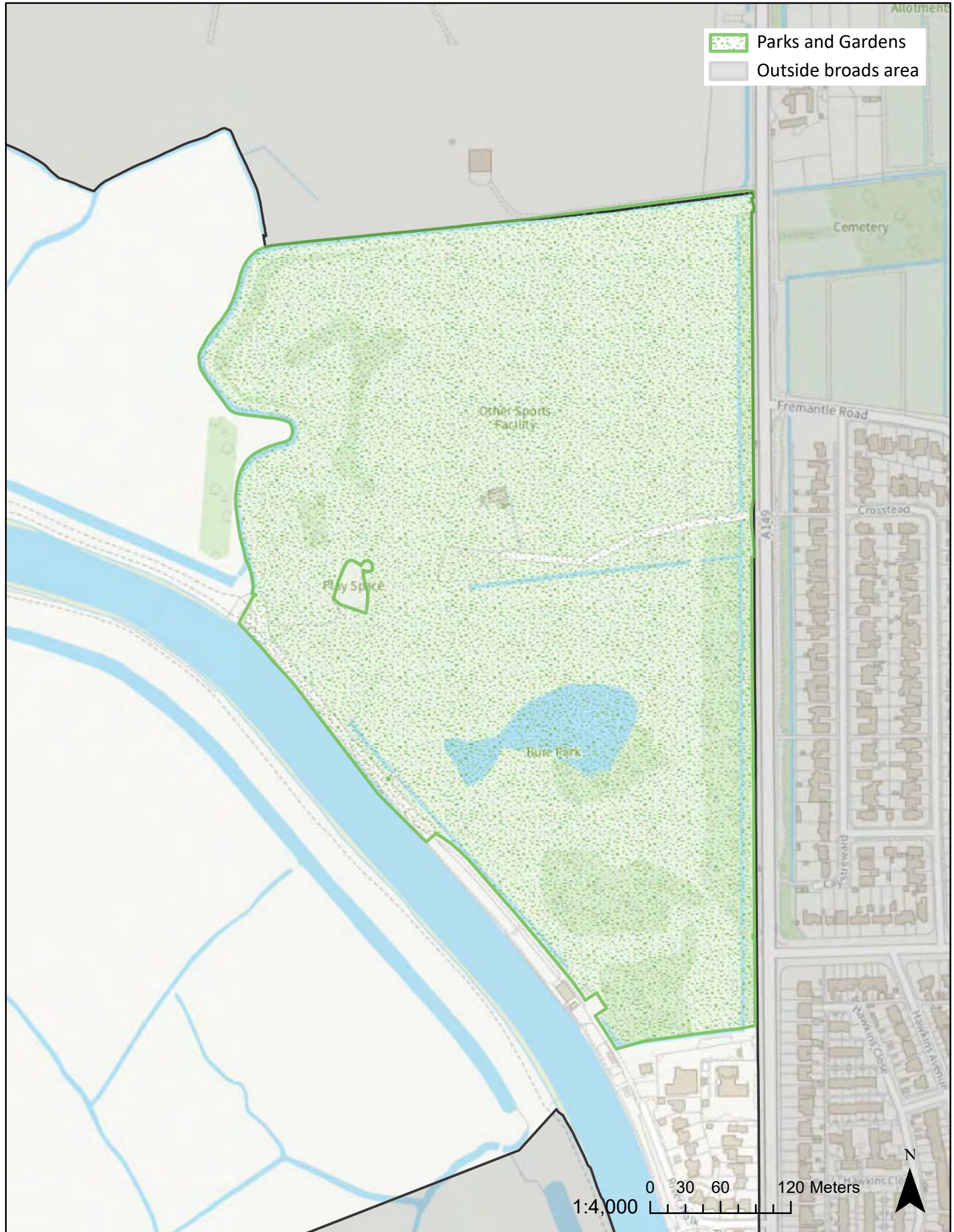
# Current Open space: Bramerton



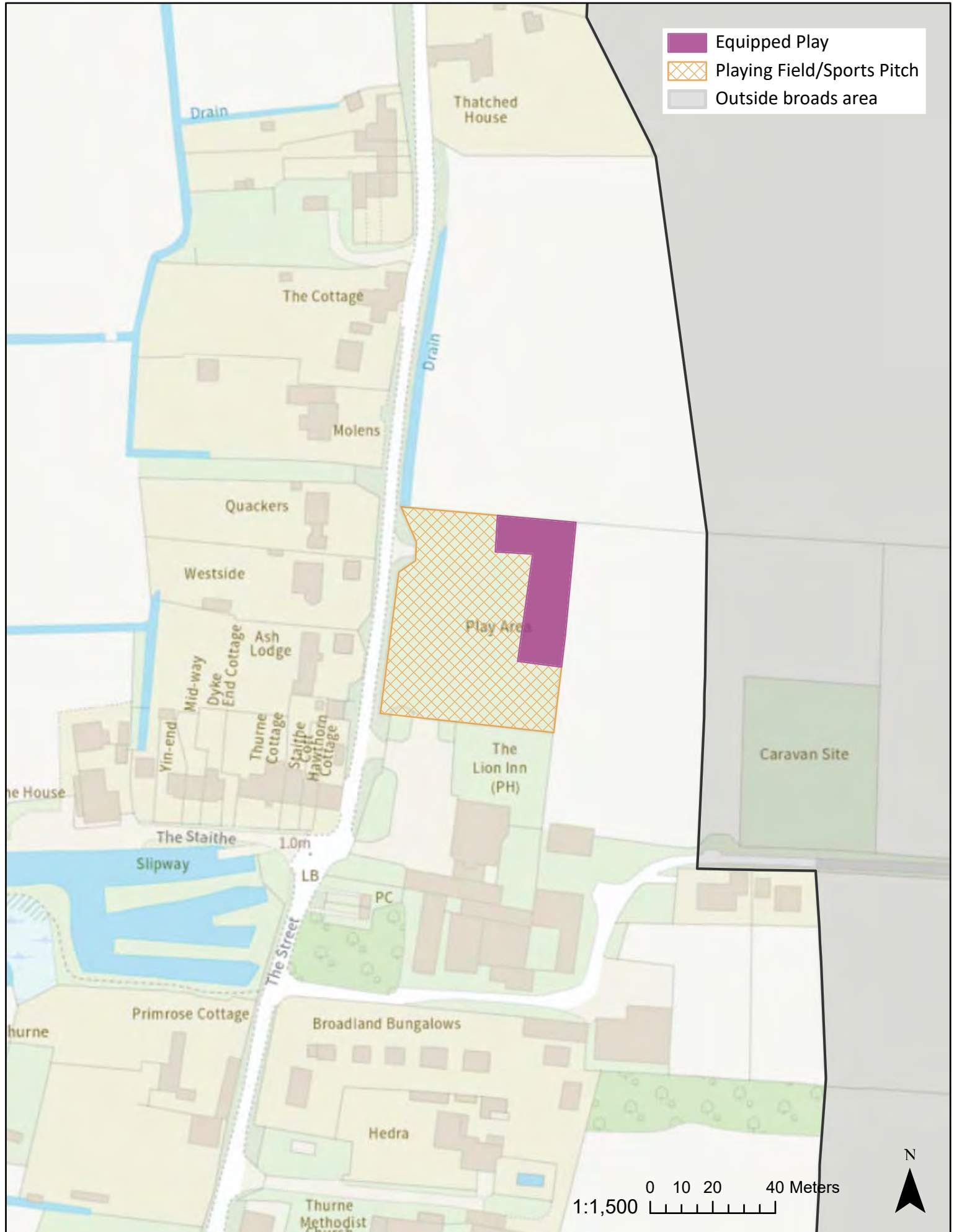
# Current Open space: Surlingham Ferry



# Current Open space: Bure Park



# Current Open space: Thurne



# Current Open space: Belaugh

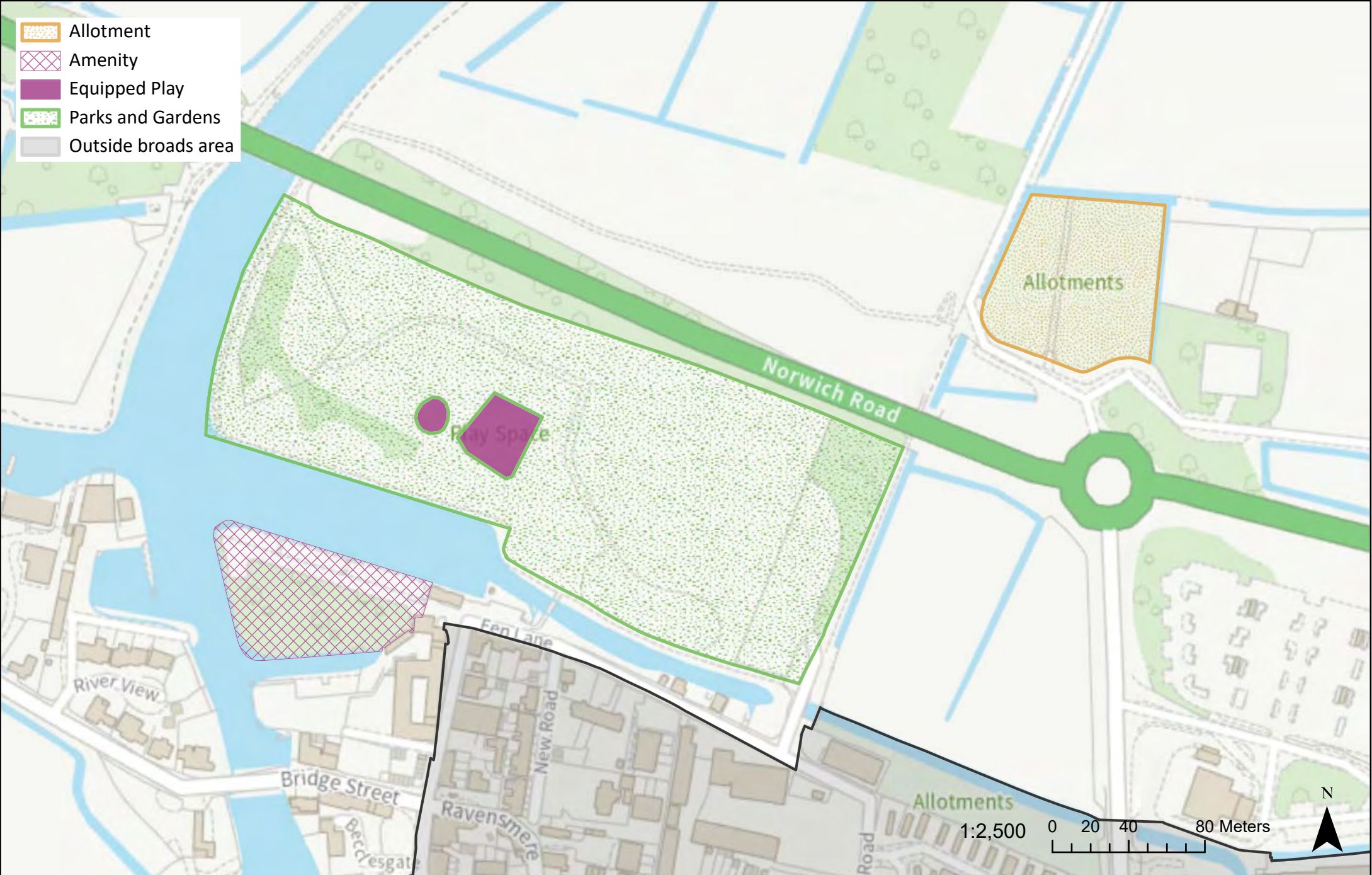


# Current Open space: Outney Common



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# Current Open space: Beccles



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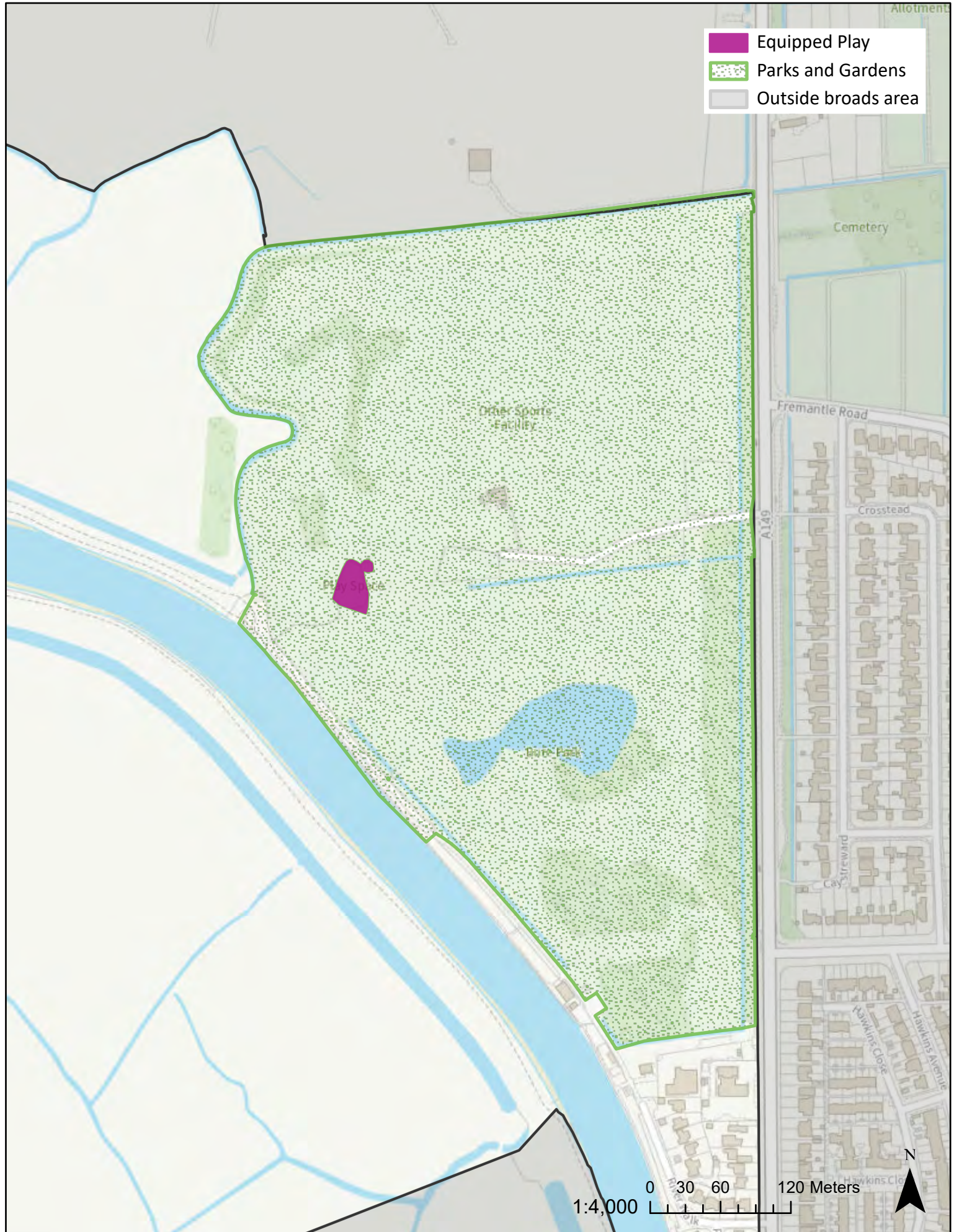


# Current Open space: Pye's Mill

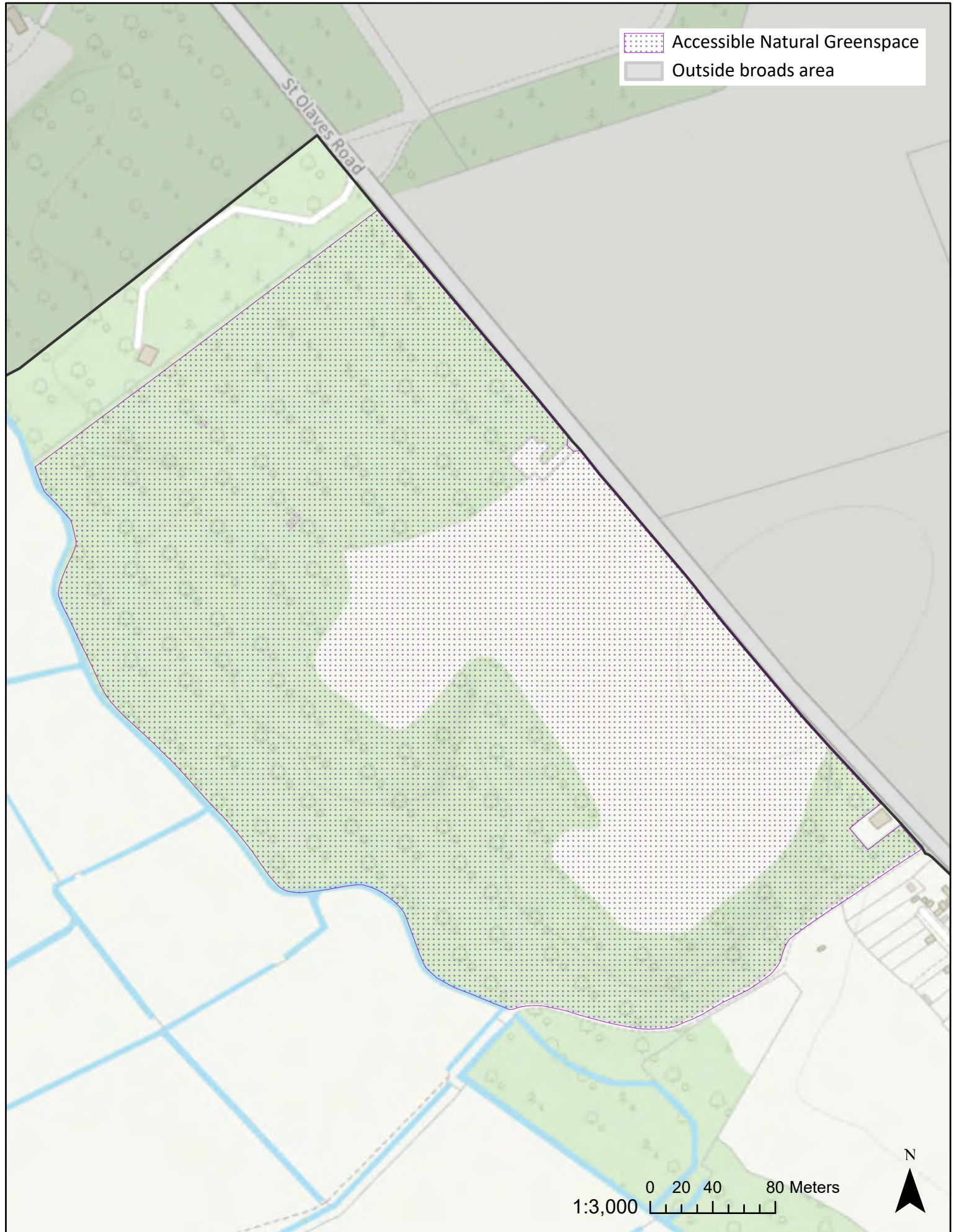


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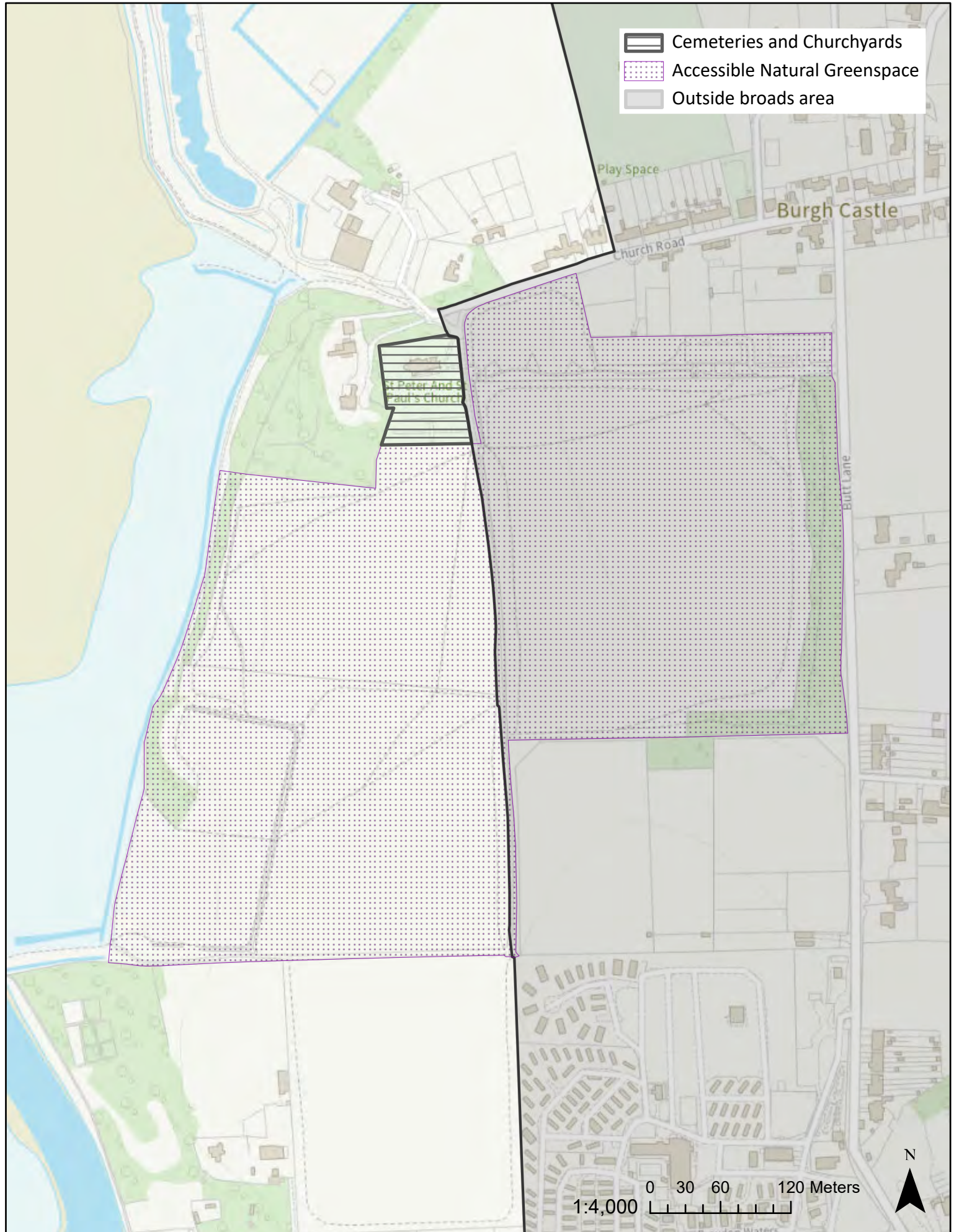
# New Open space: Bure Park



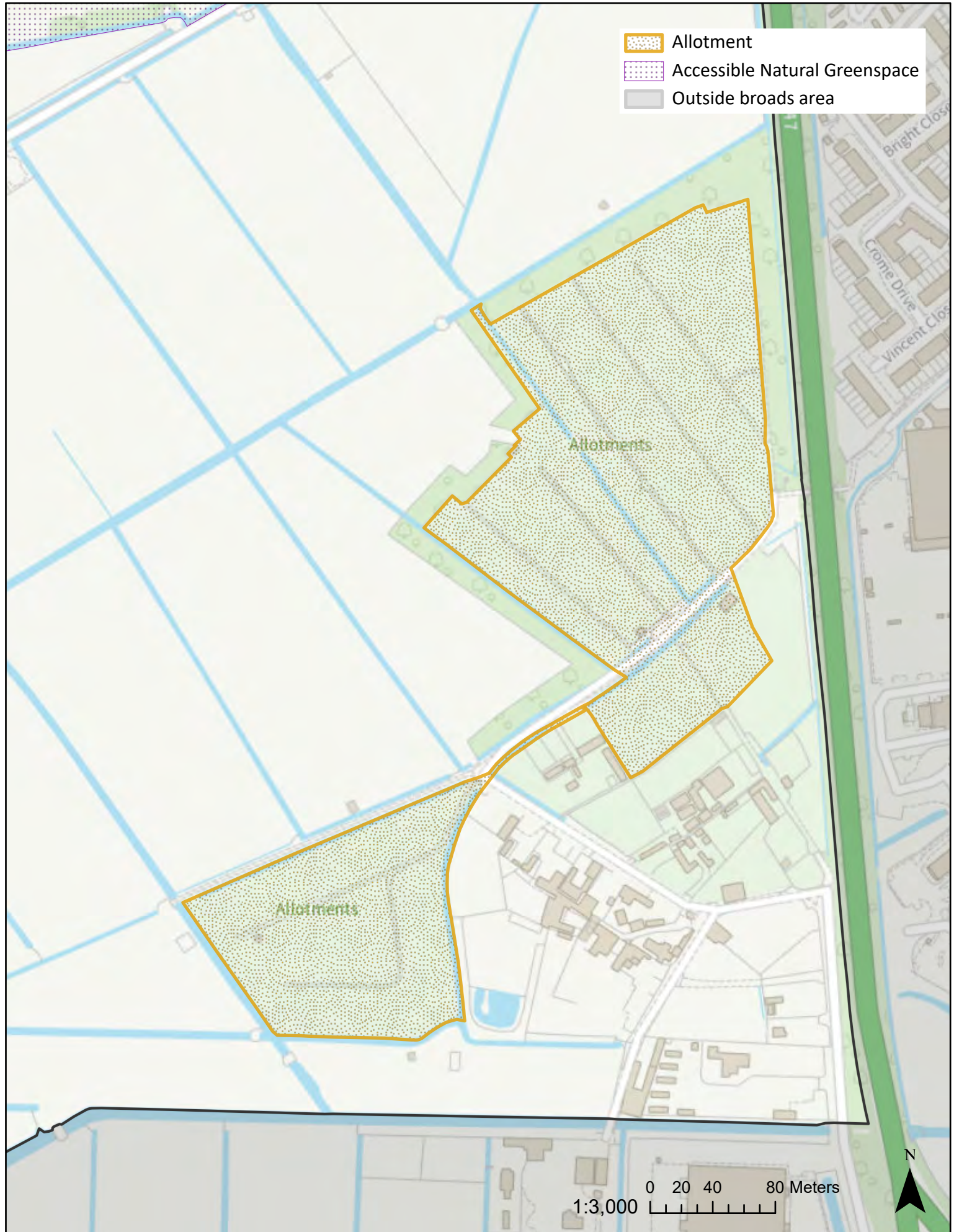
# New Open space: Herringfleet



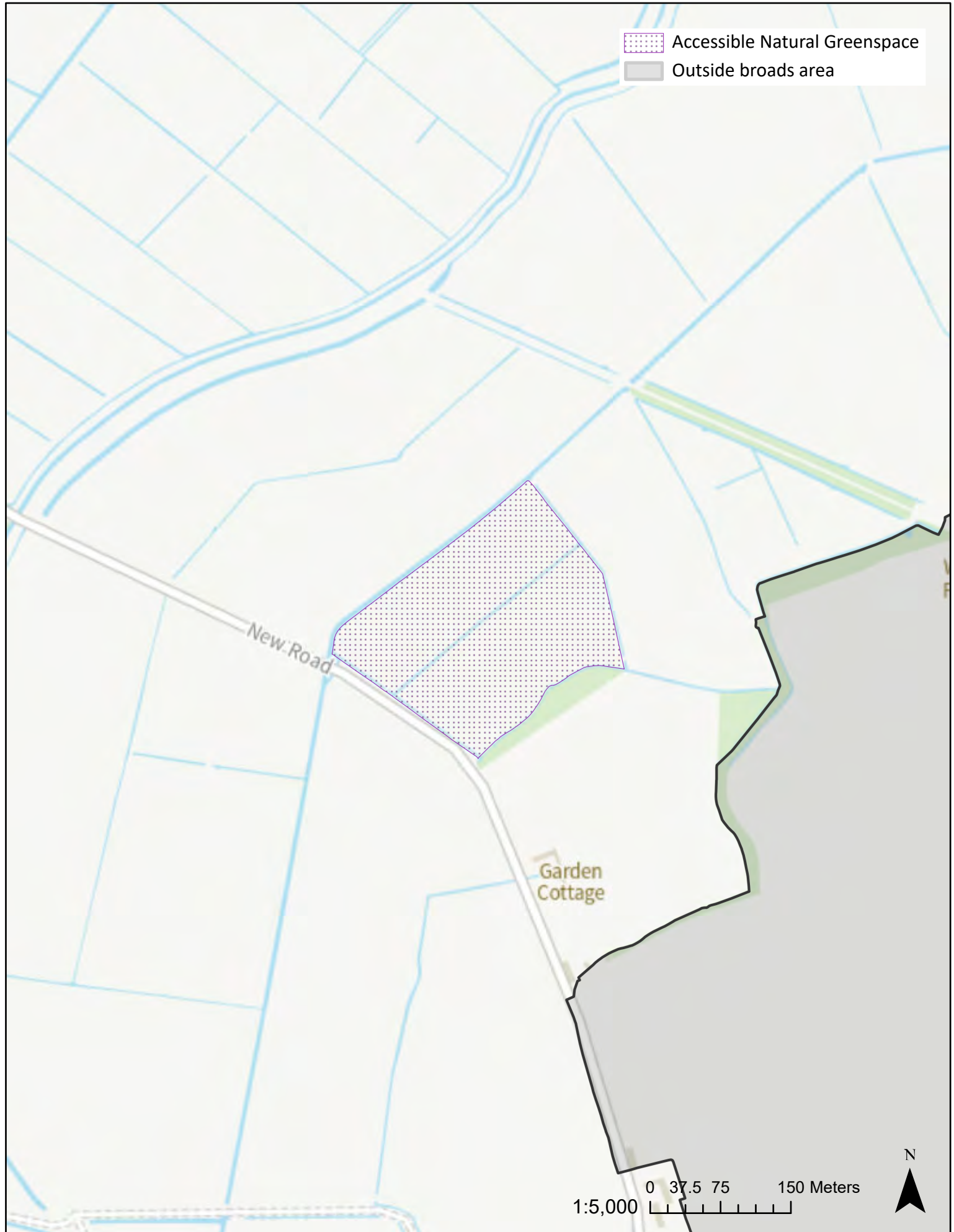
# New Open space: Burgh Castle



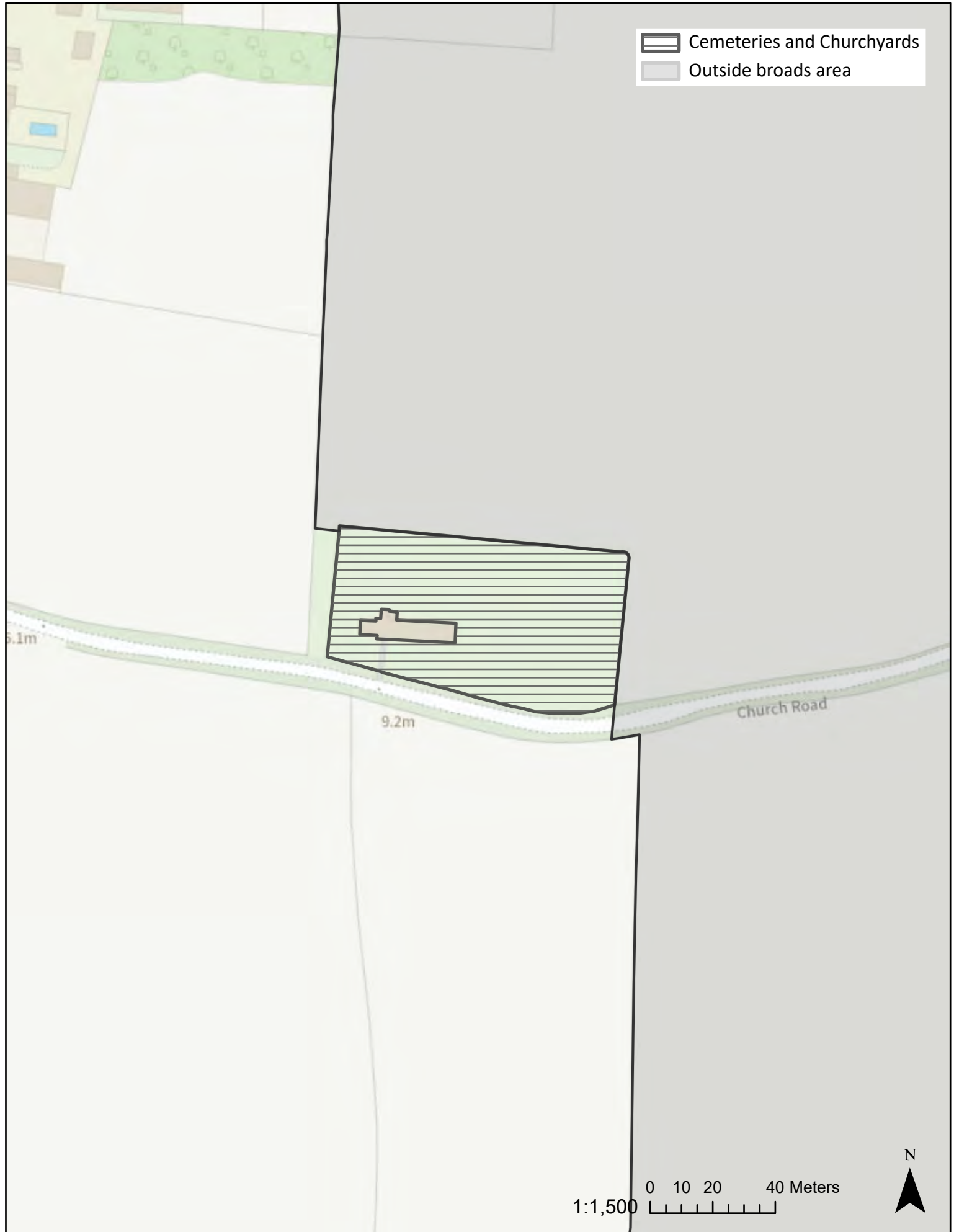
# New Open space: Cobholm



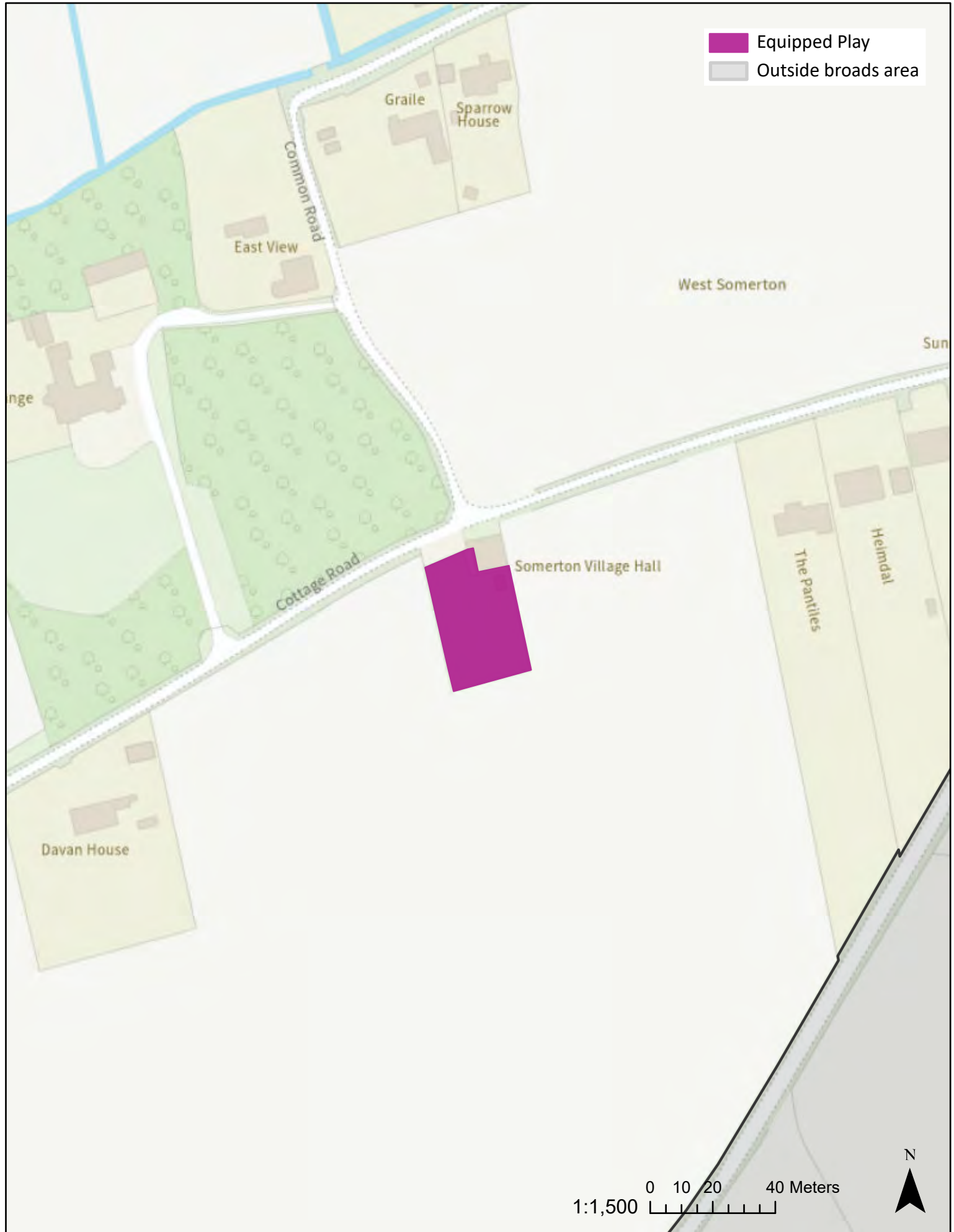
# New Open space: Poor Marshes, near Furze Hill



# New Open space: St Edmunds Church, Thurne

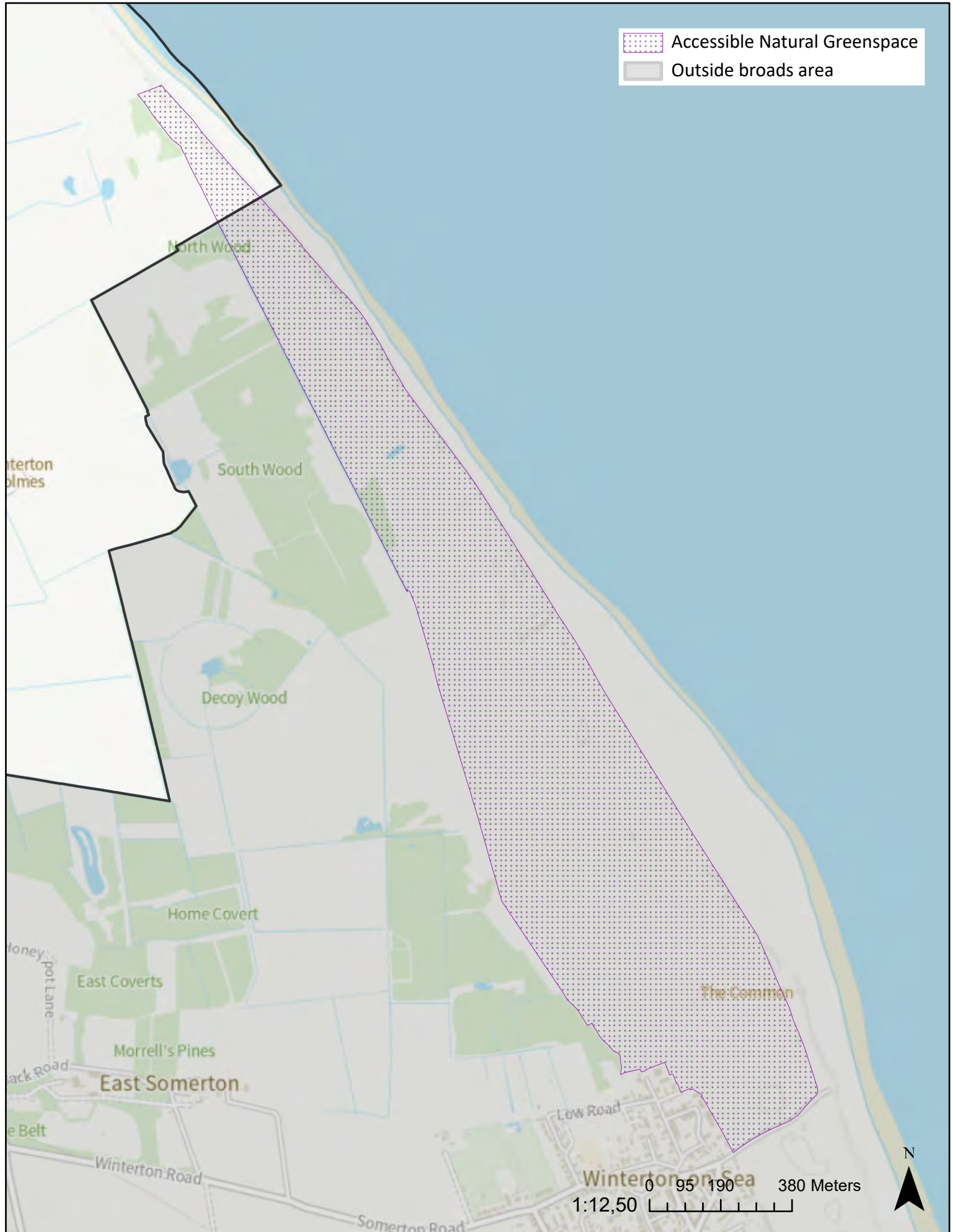


# New Open space: Somerton

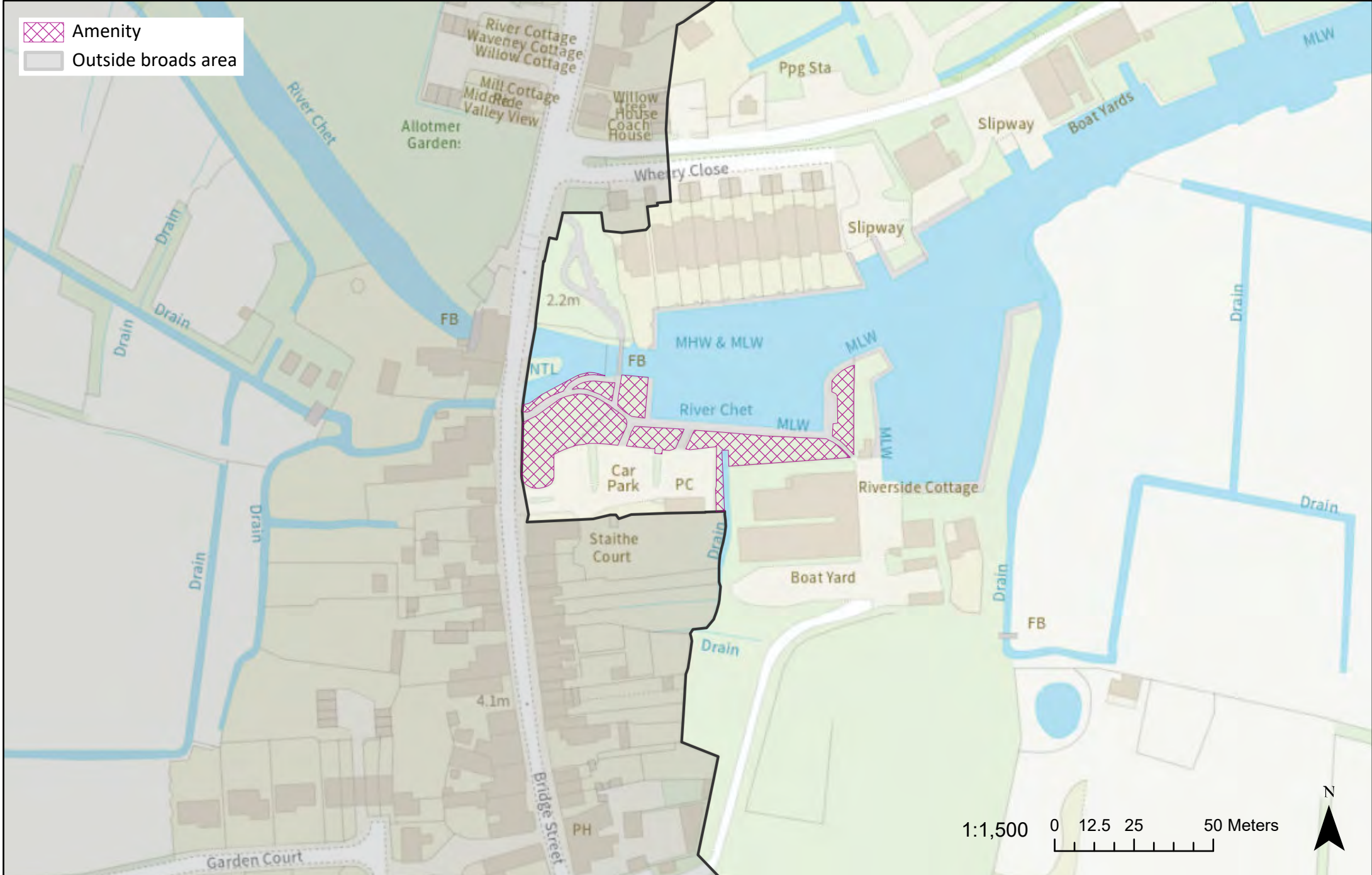




# New Open space: Winterton Dunes



# New Open space: Loddon Staithe



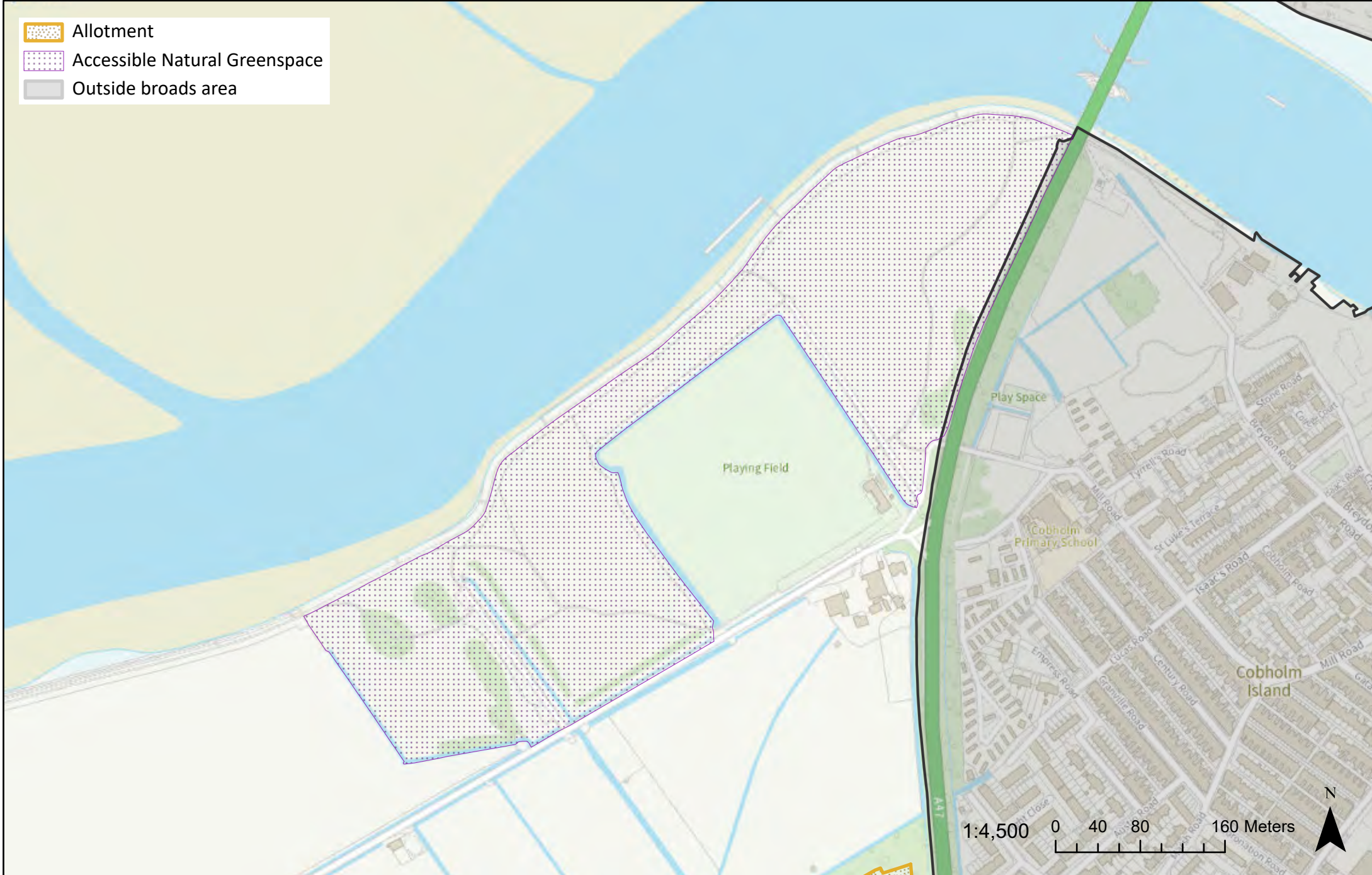
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# New Open space: Reedham Quay



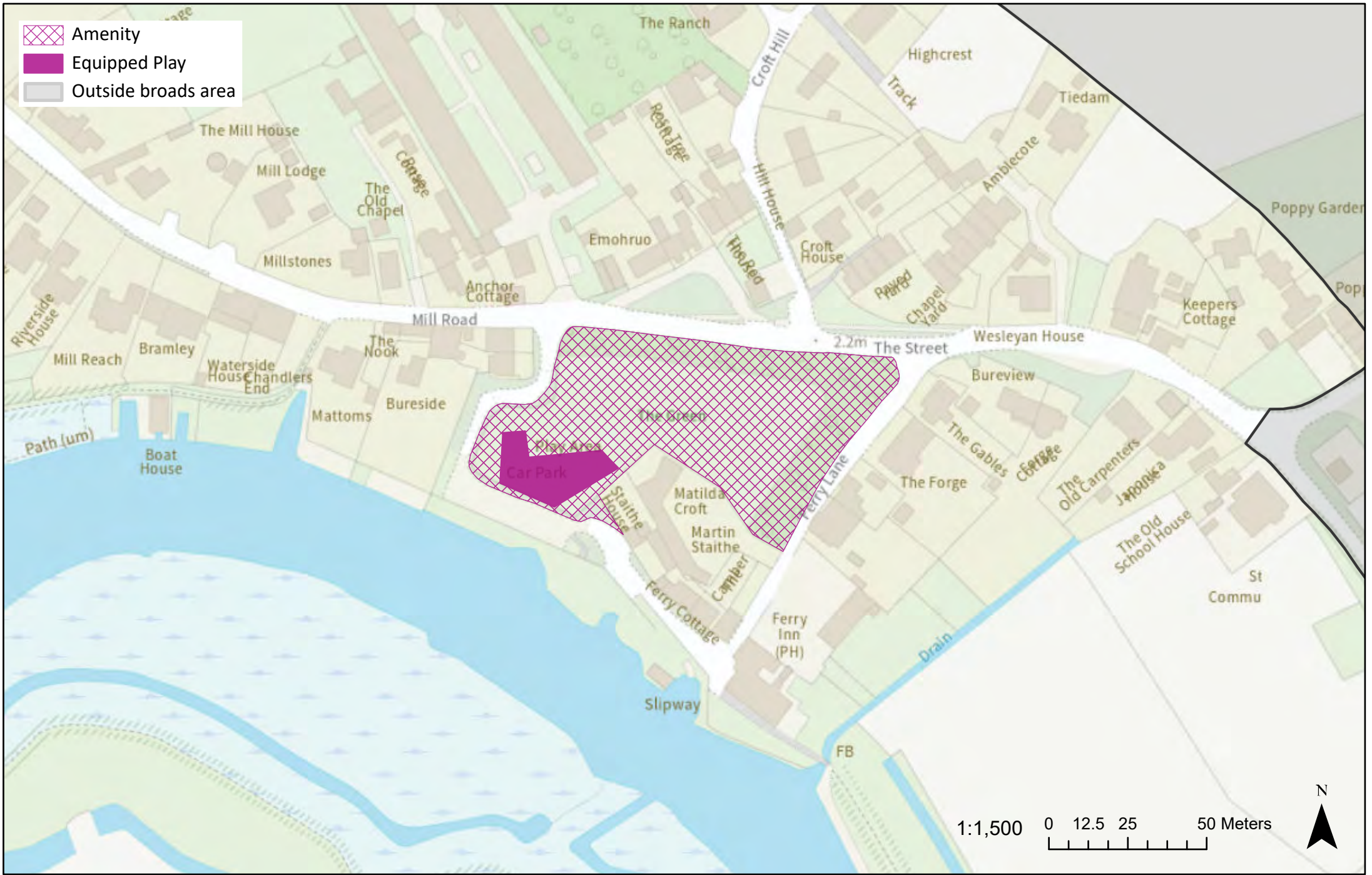
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# New Open space: Marshes adjacent to Broadland Rugby Club






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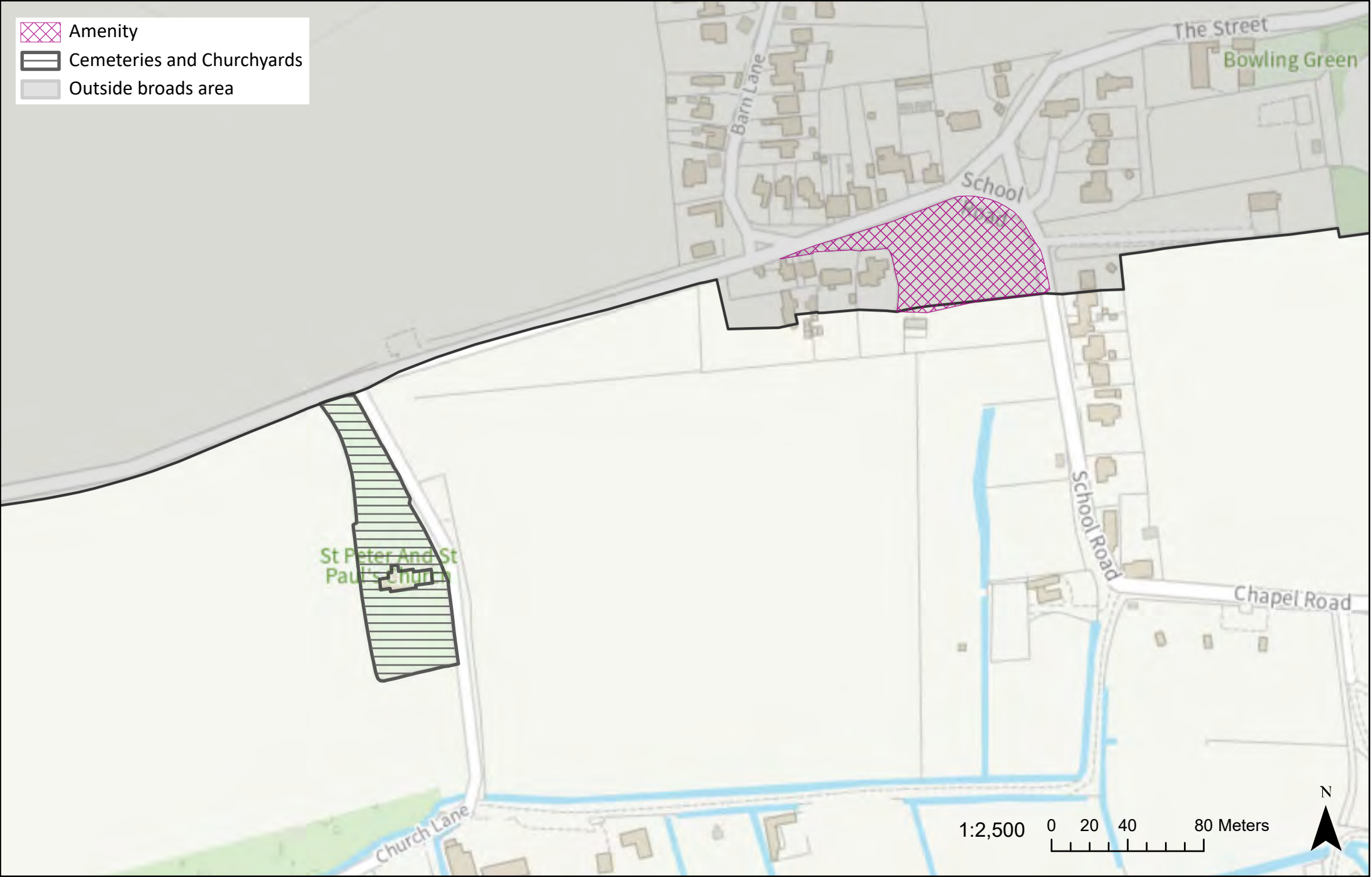
# New Open space: Stokesby



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# New Open space: Runham

-  Amenity
-  Cemeteries and Churchyards
-  Outside broads area



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Local Plan for the Broads - Review  
Preferred Options bitesize pieces

June 2023

Heritage DM policies

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

1 **Policy PODM11: Heritage Assets**

2 1. All development will be expected to protect, preserve, or enhance the significance and  
3 setting of historic, cultural and architectural heritage assets and elements of the wider  
4 historic environment that give the Broads its distinctive character.

5 2. Designated Heritage Assets

6 a) Development that would affect a Designated Heritage Asset or its setting will be  
7 considered in the context of national policy, having regard to the significance of the  
8 asset.

9 b) Development proposals affecting conservation areas should seek to improve the  
10 conservation area. Proposals should ensure that the historic character and/or  
11 appearance of the area is preserved, enhanced or seek betterment where there is  
12 currently a negative impact. In conservation areas, all development is expected to be of  
13 a particularly high standard of design and materials.

14 ~~c) Demolition of unlisted buildings in a conservation area will require justification in a~~  
15 ~~heritage statement. The demolition of structurally sound buildings which make a~~  
16 ~~positive contribution to the significance of a conservation area will be resisted unless~~  
17 ~~there are exceptional circumstances, including when the demolition is proposed as part~~  
18 ~~of a scheme for redevelopment which would make an equal or greater positive~~  
19 ~~contribution to the Conservation Area.~~

- 20 3. Identified and unidentified non-designated heritage assets<sup>1</sup>  
21 ~~In assessing development proposals that would directly or indirectly affect a non-designated~~  
22 ~~heritage asset a balanced judgement will be made, considering:~~  
23 ~~Scale of any harm or loss;~~  
24 ~~Significance of the heritage asset; and~~  
25 ~~Public benefits~~
- 26 a) Where local heritage assets (identified or unidentified) are affected by development  
27 proposals, their significance should be retained within development. Development  
28 resulting in harm to or loss of significance of a locally identified asset will only be  
29 acceptable where:
- 30 i. there are demonstrable and overriding benefits associated with the development; and  
31 ii. it can be demonstrated that there would be no reasonably practicable or viable means of  
32 retaining the asset within a development.
- 33 4. Archaeology
- 34 a) Sites of archaeological interest and their settings will be protected, enhanced, and  
35 preserved; development which has an unacceptable impact on a site of archaeological  
36 interest will not be permitted.
- 37 b) Where it is considered appropriate in cases where development coincides with the  
38 location of a known or suspected archaeological interest, an archaeological field  
39 evaluation will be required.
- 40 c) There will be a presumption in favour of preservation in-situ for Scheduled Monuments  
41 and other archaeological heritage assets of significance.
- 42 d) Development proposals that will result in unavoidable harm to, or loss of, an  
43 archaeological heritage asset's significance, will only be permitted where there is a clear  
44 justification in terms of public benefits arising from the development which outweigh  
45 that harm and, in the case of substantial harm/loss, also meet the following  
46 requirements:
- 47 i. There is no less harmful viable option;  
48 ii. The amount of harm has been reduced to the minimum possible; and  
49 iii. Satisfactory provision is made for the evaluation, excavation, recording  
50 interpretation, dissemination and archiving of the remains and then interpretation,  
51 dissemination and archiving before the commencement of development.
- 52 e) The Authority would also welcome public engagement as part of a development project  
53 to improve public understanding of the area's archaeology
- 54 5. The unknowns
- 55 a) Consideration will be given to the protection of heritage assets which have not been  
56 previously identified or designated but which are subsequently identified through the  
57 process of decision making, or during development. Any such heritage assets, including

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<sup>1</sup> Non-designated heritage assets are Locally identified heritage assets. They are buildings on the Local List as well as those identified as having positive contributors within Conservation Area Appraisals.



58 artefacts, building elements or historical associations which would increase the  
59 significance of sites and/or buildings, will be assessed for their potential local heritage  
60 significance before development proceeds.

61 b) Where heritage assets newly identified through this process are demonstrated by  
62 evidence and independent assessment to have more than local (i.e. national or  
63 international) significance, there will be a presumption in favour of their retention,  
64 protection, and enhancement.

65 c) Where an asset has potential to be locally significant, it will be assessed against the  
66 criteria set out in the reasoned justification to this policy. Where this process  
67 demonstrates there is local significance, development proposals affecting these assets  
68 will be determined in accordance with criteria listed in section b.

#### 69 6. Linking to the past

70 a) Where the Authority considers it appropriate, proposals will be required to recognise  
71 the importance of the historic environment through heritage interpretation measures.

#### 72 7. Demolition

73 a) Where proposals which involve the unavoidable loss of any designated or local heritage  
74 asset are accepted exceptionally under this policy, a legally binding commitment from  
75 the developer must be made to implement a viable scheme before any works affecting  
76 the asset are carried out.

77 b) Demolition of unlisted buildings in a conservation area will require justification in a  
78 heritage statement. The demolition of structurally sound buildings which make a  
79 positive contribution to the significance of a conservation area will be resisted unless  
80 there are exceptional circumstances, including when the demolition is proposed as part  
81 of a scheme for redevelopment which would make an equal or greater positive  
82 contribution to the Conservation Area.

#### 83 Reasoned Justification

84 The Authority recognises the importance of protecting and preserving heritage and cultural  
85 assets, but new development may in some cases be appropriate to enable historic buildings  
86 and areas to react to changing circumstances. Development proposals will, however, be  
87 judged against their effect on the significance of the asset and its setting. This policy should  
88 be read in conjunction with the policy principles and information set out in the NPPG and  
89 NPPF.

#### 90 Setting and heritage statements

91 Development that would affect the significance or setting of a Heritage Asset (designated or  
92 non-designated), including a Listed Building, a locally listed building, Conservation Area,  
93 Registered Park and Garden or Scheduled Monument or its setting, must be accompanied  
94 by a Heritage Statement. This statement should provide a schedule of works and analyse the  
95 impact of the proposal on the form, fabric, and setting of the asset and any features of  
96 historic or architectural interest, together with an assessment of the significance of the  
97 heritage asset to be affected. The statement should provide justification for the proposed

98 works and their impact on the special character of the asset. When a Design and Access  
99 Statement is required, the Heritage Statement can form part of this.

#### 100 Harm

101 In assessing the effect of development proposals on a Heritage Asset, consideration will be  
102 given to the significance of the asset and its setting, its intrinsic historic interest and rarity,  
103 and the contribution it makes to the character of the area. This will be weighed against the  
104 social and economic benefits of the proposal. Development that would cause less than  
105 substantial harm to the significance of a Listed Building, Conservation Area, or Scheduled  
106 Monument will only be permitted where the harm is outweighed by substantial public  
107 benefits of the proposal. ('Significance' can be defined as the value of a heritage asset to  
108 this and future generations because of its heritage interest. That interest may be  
109 archaeological, architectural, artistic, or historic. Significance derives not only from a  
110 heritage asset's physical presence, but also from its setting<sup>2</sup>).

#### 111 Non-designated heritage assets

112 Non-designated heritage assets include those on the Historic Environment record of Norfolk  
113 and Suffolk County Councils as well as the Broads Local List. There are also assets on neither  
114 of these lists that we know about and that have potential historic importance including  
115 landscape features. We assess one topic area at a time to understand the potential for other  
116 features or buildings to form part of the Local List. At the time of writing, the list includes  
117 mills and waterside chalets, ~~and we are planning to assess boatyards.~~

#### 118 Archaeology

119 The Broads is a low-lying wetland area where the landscape has been shaped over centuries  
120 by a combination of physical, ecological, cultural, and historic factors. Archaeological  
121 remains are a finite resource, often highly fragile and vulnerable to damage and destruction.  
122 Compared to other wetland/former wetland and areas of the East of England, the  
123 archaeology of the Broads is comparatively under-investigated. The lakes, dykes and in  
124 some cases the rivers are themselves archaeological features, and it is likely that  
125 undiscovered archaeology exists owing to the largely undeveloped nature of the area.

126 The Broads contains important archaeological sites, many of which owe their preservation  
127 to waterlogged conditions that promote conservation of organic material. Large areas of  
128 the grazing marshes have not been investigated or developed, and they are likely to  
129 represent a reserve of significant archaeological artefacts and interest, given the rich  
130 archaeology in the immediate vicinity. The importance of the palaeo-environmental  
131 remains likely to be preserved in the wetland environment is recognised. Historic England  
132 has identified the Broads as an area of *exceptional waterlogged heritage*. Because of the soil  
133 conditions in the Broads, there is great potential for archaeology to be well preserved.

134 Where possible, development proposals should be located and designed to avoid damage to  
135 archaeological remains and should enable these remains to be preserved in situ. Norfolk  
136 County Council Environment Service Historic Environment Strategy and Advice Team and  
137 Suffolk County Council Archaeological Service will be consulted on development proposals

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<sup>2</sup> Further guidance can be found in the NPPG: [www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#decision-taking-historic-environment](http://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#decision-taking-historic-environment)

138 with the potential to have an adverse impact on a site of known or suspected archaeological  
139 interest. When a proposal has a potential adverse effect on a site of known or suspected  
140 archaeological interest, the development must be accompanied by archaeological field  
141 evaluations that detail the impact the proposal would have on these remains. In these  
142 cases, preservation by record secured through an agreed Written Scheme of Archaeological  
143 Investigation will be required, secured through appropriately worded planning conditions.  
144 All archaeological works will be required to be undertaken to proper professional standards,  
145 as defined by the Chartered Institute for Archaeologists (CIfA). Applicants can contact  
146 Norfolk County Council Environment Service historic environment strategy and advice team  
147 directly at hep@norfolk.gov.uk for pre-application advice. Charges apply for elements of  
148 NCCES involvement in planning cases not covered by the service level agreements with the  
149 Broads Authority. Suffolk County Council advises early consultation of the Historic  
150 Environment Record and assessment of the archaeological potential of the area at an  
151 appropriate stage in the design of new developments, so that the requirements of the NPPF  
152 and the Waveney Local Plan are met. SCCAS is happy to advise on the level of assessment  
153 and appropriate stages to be undertaken. They should be consulted for advice as early as  
154 possible in the planning application process.

155 Suffolk and Norfolk County Councils would also welcome the encouragement of public  
156 engagement as part of a development project to improve public understanding of the area's  
157 archaeology.

158 Where development can take place and still preserve important features in situ, planning  
159 conditions will be sought to secure the implementation of effective management plans that  
160 ensure the continued protection of those features.

#### 161 Newly identified assets

162 Heritage assets also include undesignated and unidentified assets that may be identified as  
163 being of significance during pre-application discussions or decision making, or that may be  
164 revealed in the course of development. These may include assets of established community  
165 value and assets that contribute to an area's sense of place and neighbourhood feel.

166 As part of the planning application process, consideration should be given to whether a  
167 heritage asset whose significance is not currently recognised or appreciated, but which  
168 becomes apparent through the application process, merits formal protection. Where,  
169 following assessment, such an asset is judged to be worthy of protection, the principle to be  
170 followed is that any proposals resulting in harm to or loss of significance will be assessed  
171 according to the degree of significance that the asset is agreed to possess, as would apply if  
172 it had already been formally recognised.

173 An independent assessment of heritage significance would normally be undertaken by  
174 Historic England (or any equivalent successor body that becomes responsible for heritage  
175 asset protection during the currency of this plan). Where the significance of newly  
176 discovered assets is ~~ad~~ judged not to be so great as to merit national protection, there may  
177 be a case for some form of local recognition, typically by including the asset, or the building  
178 or structure in which it has been discovered or of which it forms part, on the Authority's  
179 Local List (see criteria in Non-designated heritage assets section below). **Assessments of**

180 ~~local significance should use the criteria used to assess locally identified heritage assets.~~  
181 ~~They should also take account of the views of the community, local and national heritage~~  
182 ~~bodies and conservation and design professionals in reaching a balanced judgement on the~~  
183 ~~significance of the asset. The Local Heritage Listing guide from Historic England is also of~~  
184 ~~relevance<sup>3</sup>. The local criteria are:~~

- 185 ~~a. Age and integrity~~
- 186 ~~b. Historic interest—historic association (people or events), social importance, ‘lost’~~  
187 ~~lifestyle (e.g. drainage pumps and marsh cottage settlements)~~
- 188 ~~c. Architectural interest or merit~~
- 189 ~~d. Technological innovation or excellence~~
- 190 ~~e. Visual/scenic/artistic or group value~~

### 191 Non-designated heritage assets

192 Inclusion on a local list is:

- 193 • To raise awareness of the area's special heritage and its importance to local  
194 distinctiveness of the Broads
- 195 • To inform owners, the local community, developers and others about buildings which  
196 make a special contribution to the landscape of the Broads.
- 197 • To help us when making decisions about development proposals and their effect on the  
198 character of the area
- 199 • To ensure the provision of specialist advice to owners to help protect the character and  
200 setting of buildings.

201 Local List Selection:

202 The kind of structures that can be included on the Broads Local List is wide and varied  
203 including built parks and gardens, agricultural buildings, boatyards, drainage pumps, houses,  
204 bridges, locks, community buildings and monuments.

205 Inclusion depends on satisfying at least two criteria based on:

- 206 • Age and integrity
- 207 • Historic interest – historic association to people or events, social importance or links to a  
208 lost lifestyle
- 209 • Architectural interest or merit
- 210 • Technological innovation or excellence
- 211 • Visual, scenic, artistic or group value.

212 Waterside Chalets are a group of buildings that have been assessed and formally added to  
213 the local list. They are particularly distinct to the Broads and contribute significantly to the  
214 wider character of the area. They tell us a lot about the evolving history of the Broads and  
215 changing social fashions. As land prices rise and the area becomes more desirable there is  
216 an increasing pressure to significantly alter or replace these structures with something  
217 larger and/or more permanent in construction and this policy seeks to help protect the best  
218 examples. More guidance can be found [here](#).

### 219 Interpretation

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<sup>3</sup>The Local Heritage Listing guide from Historic England [historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/](https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/)

220 The Authority considers that appropriate interpretation of the historic and cultural  
 221 environment is an important aspect to development or change in the area. Such  
 222 interpretation could range from street names that reflect the heritage of the site and  
 223 retention of a particular feature to art or interpretation boards. The aim is to provide the  
 224 link to the past and ensure that visitors and the community are aware of what the site was  
 225 previously used for, or what happened on the site.

226 Demolition

227 The Authority considers that it is important that where the loss of a heritage asset has been  
 228 exceptionally allowed, it is important to ensure that before any works or demolition take  
 229 place and the heritage asset is permanently lost, a legally binding agreement should be in  
 230 place that will ensure the redevelopment of the site as agreed within a specified timeframe.

231 **Reasonable alternative options**

- 232 a) The original policy, with no amendments.  
 233 b) No policy

234 **Sustainability appraisal summary**

235 The three options (of the amended policy, no policy and the original policy) have been  
 236 assessed in the SA. The following is a summary.

A: Keep original policy	5 positives. 0 negatives. 0 ? Overall, positive.
B: Preferred Option - amend policy.	5 positives. 0 negatives. 0 ? Overall, positive.
C: No policy	0 positives. 0 negatives. 5 ? Overall, positive.

237 **How has the existing policy been used since adoption in May 2019?**

238 According to recent Annual Monitoring Reports, the policy has not been used and schemes  
 239 are in general conformity with the policies.

240 **Why have the alternative options been discounted?**

241 The amendments to the original policy seek to make the policy clearer mainly, but also seek  
 242 to make the policy stronger and so the preferred policy is favoured.

243 **UN Sustainable Development Goals check**

244 This policy meets these [UN SD Goals](#):



245 **Policy PODM12: Re-use of Historic Buildings**

- 246 1. Wherever possible, the building or structure should remain in the use for which it was  
247 originally designed.
- 248 2. The re-use, conversion or change of use of a building or structure which is a heritage  
249 asset (designated or non-designated) will only be permitted where:
- 250 a) Development proposals appropriately re-use redundant or under-used heritage assets  
251 with the optimal viable use<sup>4</sup>, securing their long-term conservation and enhancement,  
252 including of their setting;
- 253 b) A structural survey demonstrates that the building is capable of conversion where  
254 applicable and conversion, re-use or change of use can be undertaken without extensive  
255 building works, alterations or extensions that would lead to substantial harm to or loss  
256 of the asset's significance. The public benefits of the proposal will be weighed against  
257 the harm or loss in accordance with national policy and policy **DM11**;
- 258 c) The proposal is of a high-quality design, retaining the external and/or internal features  
259 that contribute positively to the character of the building, including original openings  
260 and materials, and with minimal intervention to the original form and fabric of the  
261 building (e.g. new openings);
- 262 d) The proposal can be achieved in a way that preserves the structure's historic, cultural  
263 and architectural features and its character;
- 264 e) The nature, scale and intensity of the proposed use are compatible with, and would not  
265 prejudice, surrounding uses or the character of the locality; and
- 266 f) It would not adversely affect protected species or habitats.
- 267 3. For non-designated heritage assets, where ~~this~~ it is not possible for the structure to  
268 remain in the use for which it was originally designed, employment, recreation or  
269 tourism uses (excluding holiday accommodation) will be the next preference. Conversion  
270 to residential uses, which includes holiday accommodation, will only be permitted  
271 where employment, recreation or other tourism uses of the building are proven to be  
272 unviable.

273 Reasoned Justification

274 In the majority of cases, the most effective way of protecting and preserving designated and  
275 non-designated heritage assets is to retain them in their original use. However, where these  
276 buildings can no longer sustain the use for which they were originally designed, finding an  
277 appropriate alternative use for the building often represents the best way of protecting it.  
278 The sensitive re-use of historic buildings is also good sustainable practice, both in terms of  
279 making the optimum use of the embodied energy of the building and to maintain a local skill  
280 base in the restoration of historic buildings and traditional construction techniques.

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<sup>4</sup> Sustaining heritage assets in the long term often requires investment and putting heritage assets to a viable use is likely to enable the maintenance necessary for their long-term conservation. Certain heritage assets may have limited or no scope for new uses and indeed may be so sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance. It is important that any use is viable, not just for the owner, but also the future conservation of the asset. The optimum viable use may not necessarily be the most profitable one. If there is only one viable use, that use is the optimum viable use. If there is a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.

281 Nevertheless, when considering proposals for the re-use of historic buildings, close  
282 attention must be paid to the design of any such conversion to make sure it is appropriate  
283 for the character and appearance of the building and would not adversely affect its context  
284 or setting. In particular, the loss of the primary fabric of the building and internal or external  
285 features that contribute to its character can devalue its significance. Some buildings will not  
286 be suitable for re-use, and development proposals should be accompanied by a structural  
287 survey undertaken by a suitably qualified independent Structural Engineer to help  
288 determine whether the building is capable of conversion without works that would have a  
289 significant detrimental effect on its character. In accordance with Policy DM12, a Heritage  
290 Statement (included within the Design and Access Statement where required) should also  
291 be submitted to provide a schedule of the proposed works, analyse the impact of the  
292 proposal on any important features of historic interest, and provide justification for the  
293 proposal. Policy DM11, including information requirements for and the determination of  
294 such applications, should be read in conjunction with the NPPG. Applicants are encouraged  
295 to discuss their proposals at an early stage with the Authority and, as appropriate, with  
296 Historic England.

297 Where a building is listed, its optimum viable use may be proven to be residential and  
298 subject to all of the criteria 2a-f being met this may be considered acceptable in order to  
299 ensure that the building is retained or brought back into a viable use rather than  
300 deteriorating in condition and potentially becoming 'at risk'.

301 Where it is not possible for a non-designated building or structure to remain in the use for  
302 which it was originally designed, preference will be given to re-using the building for  
303 alternative employment, leisure, or tourism uses that will have social and economic benefits  
304 for the Broads. Conversion of an historic building to a residential use can often have an  
305 adverse impact on its character, given the scale and nature of work required to meet the  
306 expectations for a permanent residence. For this reason, such residential conversions tend  
307 to be considered as a last resort. Applications to convert a non-designated heritage asset to  
308 residential use will be expected to be accompanied by a report, undertaken by an  
309 independent Chartered Surveyor, which demonstrates why economic, leisure and tourism  
310 uses would not be suitable or viable as a result of inherent issues with the building. Issues  
311 relating to the personal circumstances of the applicant or as a result of a price paid for the  
312 building will not be taken into consideration. Details<sup>5</sup> should be provided of conversion  
313 costs and the estimated yield of the commercial uses, and evidence provided on the efforts  
314 that have been made to secure economic, leisure and tourism re-use for a continuous 12-  
315 month period. This will then be reviewed, which shall be carried out entirely at the  
316 applicant's expense.

317 'Significance' is discussed in the reasoned justification to policy DM11 on Heritage Assets.

318 Applicants should be aware that historic buildings, particularly those in rural areas, have the  
319 potential to provide important breeding and roosting places for a number of species  
320 protected under a range of legislative provisions, including bats, barn owls or other nesting

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<sup>5</sup> Please see our adopted guide on marketing and viability assessment requirements: [https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0019/407404/Marketing-and-Viability-SPD.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0019/407404/Marketing-and-Viability-SPD.pdf)

321 birds. If the presence of a protected species is suspected, the applicant will normally be  
 322 required to submit a survey, undertaken by a suitably qualified ecologist, to establish  
 323 whether the species is present, whether the development would harm the species, and  
 324 what measures are proposed to avoid potential harm. There may be a requirement to  
 325 provide compensatory features, although such features should not impact adversely on the  
 326 structure, and should not preclude appropriate development where it might bring a  
 327 redundant asset or Building at Risk into use.

328 For conversions or re-use of buildings that are not historic buildings (designated or non-  
 329 designated), please refer to DM48.

330 **Reasonable alternative options**

- 331 c) The original policy, with no amendments.
- 332 d) No policy

333 **Sustainability appraisal summary**

334 The three options (of the amended policy, no policy and the original policy) have been  
 335 assessed in the SA. The following is a summary.

A: Keep original policy	5 positives. 0 negatives. 0 ? Overall, positive.
B: Preferred Option - amend policy.	5 positives. 0 negatives. 0 ? Overall, positive.
C: No policy	0 positives. 0 negatives. 5 ? Overall, positive.

336 **How has the existing policy been used since adoption in May 2019?**

337 According to recent Annual Monitoring Reports, the policy has not been used and schemes  
 338 are in general conformity with the policies.

339 **Why have the alternative options been discounted?**

340 The amendments to the original policy seek to make the policy clearer mainly, but also seek  
 341 to make the policy stronger. Also the changes may enable the ongoing protection of assets  
 342 and so the preferred policy is favoured.

343 **UN Sustainable Development Goals check**

344 This policy meets these [UN SD Goals](#):





## **Sustainability Appraisal**

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

### Assessment of policy PODM11: Heritage Assets

		A: Keep original policy	B: Preferred Option - amend policy		C: No policy
ENV1					
ENV2					
ENV3	+	Often, heritage assets can be home to biodiversity and so by protecting them, biodiversity would benefit.	+	Often, heritage assets can be home to biodiversity and so by protecting them, biodiversity would benefit.	?
ENV4	+	Heritage assets add to the character of an area.	+	Heritage assets add to the character of an area.	?
ENV5					
ENV6					
ENV7					
ENV8					
ENV9	+	Fundamentally, the policy relates to heritage assets.	+	Fundamentally, the policy relates to heritage assets.	?
ENV10	+	Policy seeks high quality meeting and design.	+	Policy seeks high quality meeting and design.	?
ENV11					
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1					
ECO2					
ECO3	+	Heritage assets are sometimes the reason why people come to an area.	+	Heritage assets are sometimes the reason why people come to an area.	?

Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.

### Assessment of Policy PODM12: Re-use of Historic Buildings

	A: Keep original policy	B: Preferred Option - amend policy	C: No policy
ENV1			
ENV2			
ENV3	+ Often, heritage assets can be home to biodiversity and so by protecting them, biodiversity would benefit. Policy also talks of biodiversity.	+ Often, heritage assets can be home to biodiversity and so by protecting them, biodiversity would benefit. Policy also talks of biodiversity.	?
ENV4	+ Heritage assets add to the character of an area.	+ Heritage assets add to the character of an area.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9	+ Fundamentally, the policy relates to heritage assets.	+ Fundamentally, the policy relates to heritage assets.	?
ENV10	+ Policy seeks high quality meeting and design.	+ Policy seeks high quality meeting and design.	?
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3	+ Heritage assets are sometimes the reason why people come to an area.	+ Heritage assets are sometimes the reason why people come to an area.	?

Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.



**Local Plan for the Broads - Review  
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**DM17 Land Raising and DM18 Excavated Material**

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

**Policy PODM17: Land raising**

1. Schemes that propose to raise land are required to justify this approach and explain what other options to address the issue that land raising seeks to resolve have been discounted, and why.
2. Proposals that involve land raising will not be permitted if they have adverse effects which cannot be satisfactorily mitigated on:
  - a) Flood risk on site and elsewhere;
  - b) Visual appearance and landscape character;
  - c) Existing habitats and mature trees; or
  - d) Archaeology and ~~the setting and significance of any~~ heritage assets. This includes adverse effects on setting and significance and also the condition of the asset as a result of land raising.
3. The application needs to demonstrate how the difference in height between adjacent plots/land holdings will be satisfactorily designed and this may require a topographical survey produced by a suitable qualified person.

Reasoned Justification

17 Land or buildings are often raised above the existing ground level, usually to reduce the risk  
18 of the site flooding, although such results are not guaranteed. Dredgings or material  
19 imported or won on site (for example resulting from a new mooring basin) may be disposed  
20 of on-site and the land raised. Such land management to maintain land levels is a historic  
21 practice in the Broads. However, the impact of land-raising can have adverse impacts:

- 22 i) It can serve to divert flood water onto neighbouring land, particularly in areas primarily  
23 affected by fluvial flooding, so the flood risk policy must also be adhered to. Land raising  
24 is not permitted within Flood Zone 3b Functional Floodplain unless it is to reinstate  
25 previously sunken land, as this would prevent the floodplain from functioning.
- 26 ii) Land in the Broads is often wet and of poor load bearing capacity. Surcharging of land  
27 with soil or other material may lead to the site sinking over a period of time.
- 28 iii) On sites in close proximity to each other, it affects the relationship of the site to  
29 surrounding plots and to access roads. On waterside sites, the relationship to the river  
30 or broad is changed, often leading to the need for higher piling and quay heading,  
31 potentially affecting the visual amenity of views from the water.
- 32 iv) It can be damaging to ecology, geomorphology, trees and other vegetation on the site.
- 33 v) It can change the character of the landscape – land-raising can increase the height and  
34 prominence of new buildings.
- 35 vi) It can affect the ability to provide alternative flood storage capacity in the drainage  
36 compartment.
- 37 vii) Material placed on top of other material can create problems for archaeology and  
38 heritage assets and the understanding of past human interaction with the environment.

39 Subject to the factors that must not be adversely affected, some land raising may be  
40 necessary for habitat creation/restoration purposes.

41 Where land-raising could be part of a scheme, applicants are required to explain what issues  
42 it seeks to resolve, and which other options have been considered and why they have been  
43 discounted, as well as justifying the raising of land. A topographical survey may be required.

44 The disposal of excavated material policy is also of relevance.

#### 45 **Reasonable alternative options**

- 46 a) No policy
- 47 b) Amended, preferred policy
- 48 c) The original policy, with no amendments.

#### 49 **Sustainability appraisal summary**

50 The three options (of no policy, the amended policy and the original policy) have been  
51 assessed in the SA. The following is a summary.

A: No policy	0 positives. 0 negatives. 4 ? Overall, positive.
B: Preferred Option	4 positives. 0 negatives. 0 ? Overall, positive.
C: Original policy	4 positives. 0 negatives. 0 ? Overall, positive.

52 **How has the existing policy been used since adoption in May 2019?**

53 According to recent Annual Monitoring Reports, the policy has been used and applications  
54 have been determined in accordance with the policy.

55 **Why have the alternative options been discounted?**

56 The changes to the policy are preferred as they clarify impacts from such processes on  
57 heritage assets and archaeology and also refer to further evidence that will help in the  
58 determining of applications.

59 **UN Sustainable Development Goals check**

60 This policy meets these [UN SD Goals](#):

**15** LIFE  
ON LAND



61 **Policy PODM18: Excavated material**

62 All proposals are required to ensure excavated material arising as a result of a scheme is  
63 disposed of according to the following hierarchy. Justification for the approach adopted is  
64 required.

- 65 i) Firstly, schemes are required to reduce to a minimum the volume of material that needs  
66 to be disposed of, then;  
67 ii) Left over material is required to be put to a productive use with the preference being  
68 used on site. Off-site productive use could be acceptable, then;  
69 iii) Any remaining material is required to be disposed of in a considerate and acceptable  
70 manner, subject to the Environment Agency permitting requirements.

71 **Reasoned Justification**

72 Typically, as a result of most types of development, excavated material is left to be disposed  
73 of. This could result from buildings and their foundations; in the Broads there are also  
74 scrapes (for nature conservation and wild fowling), wildfowling lakes, fishing lakes (for  
75 recreation), dykes (for drainage), mooring cuts or mooring basins (to moor boats).

76 These developments can lead to materials that need to be accommodated somewhere on  
77 site or taken off site. The disposal of spoil/material is often an oversight by developers. On  
78 occasion, there are presumptions of how to dispose of this material that may not be  
79 acceptable for the area, or the material is left on site, which can result in the establishment  
80 of vegetation that is not the norm for the area.

81 The Authority will require information from the applicant relating to the volume of likely  
82 excavated material and the plan for disposal and other options that have been considered.  
83 If the material is to be kept on site, detailed plans are required.

84 This policy will make sure that disposal is considered early in the scheme design process and  
85 could be incorporated positively (beneficial re-use). It could result in improved disposal of  
86 material with landscape character and habitat benefits. Of importance to disposal of  
87 material is the section on peat, the section on archaeology, and the guides referred to  
88 earlier in this section. The land-raising policy in this Local Plan is also of relevance. When  
89 disposing of material, the Environment Agency<sup>1</sup> needs to be contacted as a licence may be  
90 required.

91 [The soils section will be of relevance and so too will \*\*PODM17\*\*.](#)

92 **Reasonable alternative options**

- 93 a) No policy

94 **Sustainability appraisal summary**

95 The two options (of no policy and the original policy) have been assessed in the SA. The  
96 following is a summary.

A: No policy	0 positives. 0 negatives. 2 ?
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<sup>1</sup> Go here for more information: [www.gov.uk/topic/environmental-management/waste](http://www.gov.uk/topic/environmental-management/waste)

	Overall, positive.
B: Preferred Option	2 positives. 0 negatives. 0 ? Overall, positive.

97 **How has the existing policy been used since adoption in May 2019?**

98 According to recent Annual Monitoring Reports, the policy has been used and applications  
99 have been determined in accordance with the policy.

100 **Why have the alternative options been discounted?**

101 Given that schemes tend to result on excavated material, it is an issue worthy of its own  
102 policy and therefore it is preferred to have the policy.

103 **UN Sustainable Development Goals check**

104 This policy meets these [UN SD Goals](#):





105 **Sustainability Appraisal**

106 SA objectives:

- 107 • ENV1: To reduce the adverse effects of traffic (on roads and water).
- 108 • ENV2: To safeguard a sustainable supply of water, to protect and improve water quality
- 109 and to use water efficiently.
- 110 • ENV3: To protect and enhance biodiversity and geodiversity.
- 111 • ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and
- 112 towns/villages.
- 113 • ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- 114 • ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk
- 115 and coastal change.
- 116 • ENV7: To manage resources sustainably through the effective use of land, energy and
- 117 materials.
- 118 • ENV8: To minimise the production and impacts of waste through reducing what is
- 119 wasted, and re-using and recycling what is left.
- 120 • ENV9: To conserve and enhance the cultural heritage, historic environment, heritage
- 121 assets and their settings
- 122 • ENV10: To achieve the highest quality of design that is innovative, imaginable, and
- 123 sustainable and reflects local distinctiveness.
- 124 • ENV11: To improve air quality and minimise noise, vibration and light pollution.
- 125 • ENV12: To increase the proportion of energy generated through renewable/low carbon
- 126 processes without unacceptable adverse impacts to/on the Broads landscape
- 127 • SOC1: To improve the health and wellbeing of the population and promote a healthy
- 128 lifestyle.
- 129 • SOC2: To reduce poverty, inequality and social exclusion.
- 130 • SOC3: To improve education and skills including those related to local traditional
- 131 industries.
- 132 • SOC4: To enable suitable stock of housing meeting local needs including affordability.
- 133 • SOC5: To maximise opportunities for new/ additional employment
- 134 • SOC6: To improve the quality, range and accessibility of community services and
- 135 facilities and to ensure new development is sustainability located with good access by
- 136 means other than a private car to a range of community services and facilities.
- 137 • SOC7: To build community identity, improve social welfare and reduce crime and anti-
- 138 social activity.
- 139 • ECO1: To support a flourishing and sustainable economy and improve economic
- 140 performance in rural areas.
- 141 • ECO2: To ensure the economy actively contributes to social and environmental well-
- 142 being.
- 143 • ECO3: To offer opportunities for Tourism and recreation in a way that helps the
- 144 economy, society and the environment.

145 Assessment of policy

146 Policy **PODM17: Land raising**

		A: No policy	B: Preferred Option - amend policy		C: Original policy
ENV1					
ENV2					
ENV3	?		+ Policy seeks protection of habitats.	+	Policy seeks protection of habitats.
ENV4	?		+ Policy seeks protection and consideration of landscape impact.	+	Policy seeks protection and consideration of landscape impact.
ENV5					
ENV6	?		+ Policy refers to flood risk as a consideration.	+	Policy refers to flood risk as a consideration.
ENV7					
ENV8					
ENV9	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy refers to impact on archaeology and heritage assets. Wording is stronger than original policy.	+	Policy refers to impact on archaeology and heritage assets.
ENV10					
ENV11					
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1					
ECO2					
ECO3					

147 Policy PODM18: Excavated material

		A: No policy	B: Original policy
ENV1			
ENV2			
ENV3			
ENV4			
ENV5			
ENV6			
ENV7	?		+ The policy seeks early consideration about what to do with excavated material.
ENV8	?		+ The policy seeks early consideration about what to do with excavated material.
ENV9		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			



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**DM49 Advertisements and signs**

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

**Policy PODM49: Advertisements and signs**

- 1 1. All proposals for the display of advertisements must comply with relevant national regulations  
2 and guidance.
- 3
- 4 2. Advertisements and signs should be appropriately and sensitively designed and located, having  
5 regard to the character of the building/structure/area on/near which they are to be displayed,  
6 and/or the general characteristics of the locality including their location relative to the dark sky  
7 zones (policy DM22) (see point 4).
- 8 3. Advertisements and signs will only be permitted where the size, design (see point 4),  
9 positioning, materials and degree of illumination (see point 5) of the sign or advertisement  
10 would not have an adverse visual impact on the built or landscape character of the Broads or a  
11 detrimental effect on public safety on land, water or on the operational safety of the highway,  
12 railway and water network.
- 13 4. Advertisements and signs need to be designed with colours and materials compatible with the  
14 building and area.
- 15 5. There is a general presumption against illuminating advertisements to reflect the dark skies of  
16 the Broads. If signs are proposed to be illuminated, in line with policy DMxx on light pollution  
17 and dark skies, this needs to be thoroughly justified and designed to not produce any type of  
18 light pollution/spillage.
- 19 6. Where an advertisement or sign would have an adverse impact on the special qualities of the  
20 Broads, it will be refused.

21 7. The cumulative impact of signs and/or advertisements in a particular area will also be a key  
22 consideration. The proposal shall not result in a cluttered street scene, excessive signage, or a  
23 proliferation of signs advertising a single site or enterprise.

24 8. The proposal shall not cause a hazard to pedestrians or road users;

#### 25 Reasoned Justification

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

33 The Authority will therefore carefully consider proposals for advertisements and signs to make sure  
34 they are sympathetic to the special character of the Broads and do not have an unacceptable  
35 impact on public safety on land and water. The design of an advertisement or sign, together with its  
36 size, positioning and materials, can determine how well it fits into or stands out from the  
37 surrounding area. To reduce unnecessary visual intrusion, the number of advertisements/signs will  
38 be kept to a minimum and amalgamated with existing signage. An advertisement or sign should  
39 complement existing architecture and the local context. Cumulative impact in relation to other  
40 signage in the vicinity will also be an important consideration.

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

44 Some types of advertisement are exempted from detailed control. Other specific categories do not  
45 require express consent from the Local Planning Authority, and instead qualify for 'deemed  
46 consent' provided they conform to stated conditions and limitations for each category. Further  
47 information on advertisement control can be found in the NPPG<sup>1</sup>.

#### 48 **Reasonable alternative options**

49 a) An alternative option would be to keep the original policy (other than amending text to make it  
50 clear that the policy throughout refers to signs and advertisements) and not mention specifics  
51 about the design or the issue of cumulative impact as well as strengthening the light pollution  
52 element within the policy.

53 Another option would be to not have a policy but given the potential impact of signs on the area,  
54 this is not deemed a reasonable alternative.

#### 55 **Sustainability appraisal summary**

56 The following is a summary of the assessment of the policy.

---

<sup>1</sup> NPPG: [Advertisements - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

A: Keep original policy	5 positives. 0 negatives. 0 ? Overall positive.
B: Preferred Option - amend policy	6 positives. 0 negatives. 0 ? Overall positive.

57 **How has the existing policy been used since adoption in May 2019?**

58 According to recent Annual Monitoring Reports, the policy has been used and schemes have been  
59 in conformity.

60 **Why has the alternative option been discounted?**

61 The stronger wording relating to light pollution is favoured when compared to the original to  
62 ensure the dark skies of the Broads are protected. Cumulative impact was mentioned in the  
63 supporting text of the original policy and so it seems logical to refer to it in the policy. And given the  
64 emphasis on design, it seems prudent to be more specific about design requirements.

65

66 **UN Sustainable Development Goals check**

67 This policy meets these [UN SD Goals](#):

68 None identified

## **Sustainability Appraisal**

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

## Assessment of policy

		A: Keep original policy	B: Preferred options – amended policy
ENV1			+ Policy refers to impact of signs and adverts on road users.
ENV2			
ENV3			
ENV4	+	Policy seeks advertisements and signs to be designed and located with the character in mind.	+ Policy seeks advertisements and signs to be designed and located with the character in mind.
ENV5			
ENV6			
ENV7	+	Policy seeks consideration be made about siting, in particular the potential to amalgamate.	+ Policy seeks consideration be made about siting, in particular the potential to amalgamate.
ENV8			
ENV9	+	Policy seeks advertisements and signs to be designed and located with the character in mind.	+ Policy seeks advertisements and signs to be designed and located with the character in mind.
ENV10	+	The policy requires appropriately designed signs and adverts.	+ The policy requires appropriately designed signs and adverts. This policy mentions some specific policy requirements.
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1	+	Fundamentally, the signs and adverts help to promote businesses.	+ Fundamentally, the signs and adverts help to promote businesses.
ECO2			
ECO3			





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**THORPE ST. ANDREW**

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

**Policy POTSA1: Cary's Meadow**

**Policy Map 12 and inset map**

- a) Land at Cary's Meadow will be conserved and enhanced for its contribution to the landscape, its wildlife and openness, and the appropriate recreation use by visitors and local residents.
- b) The provision of appropriately designed and located cycle parking is encouraged and supported.

**Constraints and features**

- Cary's Meadow is a Norfolk County Wildlife Site, part of which lies within the Thorpe St. Andrew with Thorpe Island Conservation Area.
- Flood risk - mainly zone 2 and some zone 1 by EA mapping; small part 2, 3a and by SFRA 2017).

**Reasoned Justification**

Cary's Meadow is a valuable site for wildlife and popular open space for the local community. The policy signals the Authority's continuing commitment to its protection and improvement. The river can also be accessed and viewed from the Meadow. In 2015, canoe

17 access points were put in place. [Given the Meadow's location close to the Norwich urban](#)  
18 [area, the policy encourages and supports appropriately designed and located cycle parking.](#)

19 **Reasonable alternative options**

- 20 1. An alternative option would be to keep the original policy and not mention cycle  
21 parking.  
22 2. An alternative option could be to not have a policy. This policy could be protected by  
23 other policies in the Local Plan and the Neighbourhood Plan (when made).

24 **Sustainability appraisal summary**

25 The following is a summary of the assessment of the policy.

A: Keep original policy	3 positives. 1 negatives. 0 ? Overall positive.
B: Preferred Option - amend policy to improve reference to cycle parking	4 positives. 1 negatives. 0 ? Overall positive.
C: No policy	0 positives. 0 negatives. 4 ? Overall positive.

26 **How has the existing policy been used since adoption in May 2019?**

27 According to recent Annual Monitoring Reports, the policy has not been used.

28 **Why has the alternative option been discounted?**

29 Given that the area is not an allocated open space and given the importance of the area to  
30 this part of the Broads, to not have a policy is not seen as reasonable. The wording relating  
31 to cycle parking provision is preferred given the location of the site near to Norwich and lack  
32 of cycle parking currently.

33 **UN Sustainable Development Goals check**

34 This policy meets these [UN SD Goals](#):

**3** GOOD HEALTH  
AND WELL-BEING



**15** LIFE  
ON LAND



35 **Policy POTSA2: Thorpe Island**

36 **Thorpe Island Inset Map 12**

37 1) Development on Thorpe Island will be managed to:

38 a) maintain and enhance:

39 i) the character and appearance of the Conservation Area;

40 ii) the visual amenity and the residential amenity of neighbouring occupiers;

41 iii) the contribution of the island to the wider landscape of the River Yare; and

42 iv) the navigational value of the Yare and the New Cut; and

43 b) avoid any significant increase in:

44 i) the intensity or extent of mooring use;

45 ii) the intensity or extent of on-shore development required to support any lawful mooring  
46 uses;

47 iii) vehicular traffic using the bridge;

48 iv) dinghy access likely to lead to the mooring or storage of dinghies (or other small craft)  
49 on the Thorpe shore, unless specific and satisfactory provision has been made for this;

50 v) car parking in the Thorpe area, unless specific and satisfactory provision has been made  
51 for this;

52 vi) risk of groundwater or river water pollution; and

53 vii) flood risk, and reduce flood risk where practicable.

54 c) not add to light pollution by ensuring any lighting is justified and well-designed.

55 2) For planning purposes, the island is split into three parts, to which the following criteria  
56 apply:

57 a) Eastern End of Thorpe Island

58 i) This part of the island is retained in boatyard usage. Well-designed upgrades or renewals  
59 to the existing boatyard buildings (in conformity with the design guide or successor  
60 document) to facilitate the continued boatyard use and, which reflect this part of the  
61 island being in the Conservation Area and the urban/rural transition area, as well as  
62 being a gateway into Norwich, will be supported. Any proposals must also improve the  
63 landscaping of this part of the island. In relation to the private moorings along the river  
64 frontage, proposals which seek to give more order and improve the appearance of these  
65 moorings and the associated paraphernalia on the island itself will be supported.

66 b) Central part of Thorpe Island

67 i) This part of the island will be retained in its current use with no significant extensions to  
68 the existing buildings and replacements on a like for like basis (in conformity with the  
69 design guide or successor document).

70 c) Western end of Thorpe Island (including the basin)

71 i) This part of the island will be retained as open in nature with no built development.  
72 Proposals which remove the poor-quality structures and paraphernalia will be  
73 welcomed. Proposals shall make significant improvement to the visual appearance of  
74 the area and provide biodiversity enhancements.

- 75 ii) Within the basin, the provision of private moorings for up to 25 vessels is acceptable,  
76 subject to the satisfactory provision of well-designed and screened on-site car parking,  
77 refuse storage and disposal, sewage disposal and upgrades to the bridge. Significant  
78 improvements will also be required to the landscaping. Moorings shall be laid out in an  
79 informal configuration to avoid regimentation in appearance<sup>1</sup>. Proposals for the basin  
80 must include the removal and suitable disposal of the sunken vessels to improve the  
81 visual appearance of the area and enable safe usage of the basin.
- 82 iii) No other development shall be permitted on the Western end of the Island.

### 83 Constraints and features

- 84 • Almost the whole of Thorpe Island is within the Thorpe St Andrew with Thorpe Island  
85 Conservation Area. (Only the railway line along the southern edge of the Island is  
86 excluded.)
- 87 • Almost the whole of the Island is in high flood risk zones (EA zone 3; SFRA 2017 most  
88 zone 2, 3a and modelled 3b).
- 89 • The Island is in an area of safeguarded minerals (sand and gravel) resources, but the  
90 Minerals Planning Authority has advised this is unlikely to constrain the type and scale of  
91 development supported by the policy.
- 92 • Bridges constrain types and size of vessels entering the river from the cut.
- 93 • For the Eastern and Central parts of the Island, there is no pedestrian or vehicular access  
94 from land; access is only by boat.
- 95 • Narrow vehicular access via a bridge to the Western end of Thorpe Island.
- 96 • Amenity of varying neighbouring uses.
- 97 • Limited utilities provision.
- 98 • Active railway line.
- 99 • Mooring basin.
- 100 • Sunken vessels within basin.
- 101 • Rural/urban transition area.
- 102 • Outside development boundary.
- 103 • River Green nearby (TSA5).

### 104 Reasoned Justification

105 The semi-natural appearance that much of the Island provides is an important backdrop to  
106 views from River Green and its environs, and more generally to the character and  
107 appearance of the Conservation Area. It also provides a semi-natural view from the riverside  
108 path in Whitlingham Country Park, screening the traffic and urban development of Thorpe  
109 St. Andrew and helping provide a more tranquil and semi-rural character to the Park.

110 Since the closure of the hire boatyards that previously operated from the Island, a whole  
111 series of uses and operations, many unauthorised, have given rise to complaints from  
112 neighbouring occupiers and the Town Council, with successive enforcement actions by the  
113 Authority, decisions by the Planning Inspectorate and subsequent legal judgements by  
114 courts. The residential occupancy of the former boatyard office and the operation of a  
115 boatyard at the Eastern end of the Island are legitimate (Area A).

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<sup>1</sup> This wording reflects the Inspector's decision: [More detail and background can be found here: www.broads-authority.gov.uk/news-and-publications/news/thorpe-island-full-facts](http://www.broads-authority.gov.uk/news-and-publications/news/thorpe-island-full-facts) [Thorpe Island appeal decision 20 Oct 2014 \(pdf | broads-authority.gov.uk\)](#)

116 The Island has very limited access. A narrow bridge to the west does connect the Island to  
117 the shore but is very narrow, with poor alignment and emerging into a small residential  
118 estate, and is not a suitable route for significant traffic or heavy vehicles. There is a serious  
119 shortage of parking in the vicinity to serve local residents, local business, and visitors to the  
120 popular riverside area of River Green.

121 Significant development of the Island would give rise to additional pressure on this already  
122 limited capacity. Access to the Island is primarily by boat, but this too is constrained. Boat  
123 access to the north side of the Island from the main river (New Cut) is constrained by shoal  
124 water and the low air draught (clearance height) of the railway bridges at both ends of the  
125 Island, while the railway along the south edge of the Island rules out direct access to it from  
126 the main river. Therefore, further substantial development of the Island is not compatible  
127 with the very limited access to it, the lack of available car parking in the environs, the  
128 Island's contribution to the character and appearance of the Conservation Area, and the  
129 wider landscape.

130 The Environment Agency highlights that the site lies within its designated Source Protection  
131 Zone 1, and the importance here of avoiding the risk of pollution to the groundwater  
132 resources. It also emphasises the need to address the risks of water pollution for waterside  
133 sites in industrial/boatyard use.

134 [The Broads Authority's Design Guide addresses waterside buildings](#) xxxx.

135 [Given the site's location, in a semi-rural area and next to water, lighting could have a big  
136 impact and so needs to be fully justified and well designed.](#)

137 The policy for the **eastern end of the Island** seeks the retention of the boat usage and  
138 allows for related improvements to the existing buildings. This reflects the flood risk to the  
139 site as well as there being no pedestrian or vehicular access. This is a prominent site at the  
140 gateway to Norwich. It is located in the Conservation Area, is within the transition from rural  
141 to urban, and is prominent from River Green. Along the river are many long-term moorings,  
142 with associated paraphernalia on the island itself. It is haphazard in layout and in a  
143 prominent location with views from River Green, and the Authority seeks improvements to  
144 the appearance of this area.

145 Turning to the **central part of the island**, the usage includes boatsheds for storing of craft,  
146 rowing facilities, and amenity plots. The policy seeks to retain this low impact use.

147 Finally, the **western end of the island** has been the subject of many complaints,  
148 enforcement action, planning appeals and legal action. [A summary may be found here:](#)  
149 <https://www.broads-authority.gov.uk/news-and-publications/news/thorpe-island-full-facts>.  
150 [The final appeal decision is here: Thorpe Island appeal decision 20 Oct 2014 \(pdf | broads-](#)  
151 [authority.gov.uk\)](#). The provision of appropriately surfaced and screened car parking spaces,  
152 an agreed method of waste storage and collection as well as provision for pump out all on  
153 the island will ensure that the impact of any mooring provision within the basin is minimal

154 on the nearby community. Subject to detailed design, this provision could be located to the  
 155 west of the marina, close to the existing bridge.

156 **Reasonable alternative options**

- 157 1) An alternative option would be to keep the original policy and not mention light  
 158 pollution or the design guide within the policy itself.  
 159 2) Another option would be to not have a policy.

160 **Sustainability appraisal summary**

161 The following is a summary of the assessment of the policy.

A: No policy	0 positives. 0 negatives. 8 ? Uncertain impact as policy elements could be covered by other policies.
B: Keep original policy.	7 positives. 0 negatives. 0 ? Overall positive.
C: Preferred Option - amend policy to improve reference to light pollution and the design guide.	8 positives. 0 negatives. 0 ? Overall positive.

162 **How has the existing policy been used since adoption in May 2019?**

163 According to recent Annual Monitoring Reports, the policy has not been used.

164 **Why has the alternative option been discounted?**

165 A policy is favoured given the long and complicated planning history of this area. The  
 166 stronger wording relating to light pollution is favoured when compared to the original to  
 167 ensure the dark skies of the Broads are protected in this edge of settlement location.  
 168 Mentioning the Design Guide is also important given the type of buildings in this area.

169 **UN Sustainable Development Goals check**

170 This policy meets these [UN SD Goals](#):

**3** GOOD HEALTH AND WELL-BEING



**15** LIFE ON LAND



171 **Policy POTSA3: Griffin Lane – boatyards and industrial area**

172 **Policy Map 12 and inset map**

- 173 1. Environmental and landscape improvements to this area will be sought, while protecting  
174 the existing dockyard and boatyard uses under Broads Local Plan policies on general  
175 employment and boatyards (DM26 and 28).
- 176 2. Development in the area will not be permitted except where this furthers these  
177 objectives and is compatible with the restricted road access to the area and other  
178 highway constraints.
- 179 3. Any change in line with the requirements of this policy will take account of the Listed  
180 Grade II building and its setting. Furthermore, in the light of the potential for  
181 archaeological remains in the area, an archaeological survey may be required in advance  
182 of any grant of planning permission.
- 183 4. Particular consideration will be given to the need and design of lighting and any  
184 subsequent light pollution, given the location of the area on the edge of the settlement,  
185 near to water.
- 186 5. Any proposals will need to be in conformity with the Design Guide (or successor  
187 document);

188 Constraints and features

- 189 • Listed Grade II building within area.  
190 • Area likely to be of archaeological interest.  
191 • Just across river from Whitlingham Marsh Local Nature Reserve.  
192 • Flood risk (mainly zone 3 by EA mapping; zones 2, 3a & modelled 3b, by SFRA 2017  
193 mapping).  
194 • This area contains safeguarded minerals (sand and gravel) resources, but the Minerals  
195 Planning Authority has advised this is unlikely to constrain the type and scale of  
196 development supported by the policy.

197 Reasoned Justification

198 The policy seeks to support the value of the boatyards and dockyard, while ensuring that full  
199 regard is given to the desirability of achieving environmental improvements, and to the  
200 constrained road access to the area. Environmental improvements could relate to water  
201 quality, biodiversity, soil, and noise and air pollution.

202 The Broads Authority's Design Guide addresses waterside buildings xxxx.

203 Given the site's location, in a semi-rural area and next to water, lighting could have a big  
204 impact and so needs to be fully justified and well designed.

205 **Reasonable alternative options**

- 206 1) An alternative option would be to keep the original policy and not mention light  
207 pollution or the design guide within the policy itself.  
208 2) Another option would be to not have a policy.

209 **Sustainability appraisal summary**

210 The following is a summary of the assessment of the policy.

A: No policy	0 positives. 0 negatives. 6 ? Uncertain impact as policy elements could be covered by other policies.
B: Keep original policy.	5 positives. 0 negatives. 0 ? Overall positive.
C: Preferred Option - amend policy to improve reference to light pollution and the design guide.	6 positives. 0 negatives. 0 ? Overall positive.

211 **How has the existing policy been used since adoption in May 2019?**

212 According to recent Annual Monitoring Reports, the policy has not been used.

213 **Why has the alternative option been discounted?**

214 The stronger wording relating to light pollution is favoured when compared to the original  
215 to ensure the dark skies of the Broads are protected in this edge of settlement location.  
216 Mentioning the Design Guide is also important given the type of buildings in this area.

217 **UN Sustainable Development Goals check**

218 This policy meets these [UN SD Goals](#):

15 LIFE ON LAND



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE





219 **Policy TSA4: Bungalow Lane – mooring plots and boatyards**

220 **Policy Map 12 and inset map**

- 221 1. Further development will be limited by the area’s vulnerability to flooding, the retention  
222 of its semi-rural character, and the poor road access.
- 223 2. The existing tree cover will be retained. Additional tree and other planting will be  
224 encouraged, subject to avoiding the creation of additional wind shadowing of the river  
225 affecting its sailing value.
- 226 3. Permission will not be granted for:  
227 i) permanent dwellings;  
228 ii) the use as permanent dwellings of buildings restricted to holiday or day use;  
229 iii) the use for holiday or permanent occupation of buildings constructed as day huts,  
230 boatsheds or temporary buildings; or  
231 iv) the stationing of caravans.
- 232 4. Extensions to existing buildings, and replacement buildings, will be permitted, provided  
233 that:  
234 a) the building and use proposed complies with policies for development in areas of flood  
235 risk;  
236 b) the design, scale, materials and landscaping of the development contributes positively  
237 to the  
238 semi-rural and holiday character of the area, and pays appropriate regard to the amenity  
239 of  
240 nearby occupiers and is in conformity with the Design Guide (or successor document);  
241 c) particular consideration is taken to the need and design of lighting and any subsequent  
242 light pollution, given the location of the area on the edge of the settlement, near to  
243 water;  
244 d) Care is be taken to avoid over-development of plots, and in particular:  
245 i) a significant proportion of the plot area (excluding mooring areas) should remain  
246 unbuilt;  
247 ii) buildings should not occupy the whole width of plots;  
248 iii) buildings should be kept well back from the river frontage; and  
249 iv) buildings should be of single storey of modest height, with floor not raised excessively  
250 above ground level.
- 251 5. Development of new or replacement buildings within existing boatyards to meet  
252 essential operational needs will be permitted, provided that no significant increase in  
253 traffic on Bungalow Lane would result.

254 Constraints and features

- 255 • Just across river from Whitlingham Marsh Local Nature Reserve.  
256 • Flood risk (zones 2 & 3 by EA 2012 mapping; zone modelled 3b by SFRA 2017 mapping).  
257 • The site is in an area of safeguarded minerals (sand and gravel) resources, but the  
258 Minerals Planning Authority has advised this is unlikely to constrain the type and scale of  
259 development supported by the policy.

260 Reasoned Justification

261 This is a small riverside area of mooring plots, chalets, and boatyards. Road access is poor,  
262 being a narrow track with an unmanned level crossing of the railway and a restricted  
263 junction onto the main road.

264 The aim is to avoid any increase in road traffic, any consolidation, or extension of built  
265 development along the river frontage, and any increase in flood risk.

266 The Environment Agency supports the intention to keep buildings back from the river  
267 frontage. While 'well back' is difficult to define and depends on particular local  
268 circumstances, in general setting the building back by a third of a plot could be appropriate.  
269 Being hard up or too close to the water's edge could enclose the river and be overbearing.  
270 Setting of buildings with an undeveloped area in front will also allow architectural interest  
271 of buildings to be appreciated.

272 [The Broads Authority's Design Guide addresses waterside buildings](#) **xxxx**.

273 [Given the site's location, in a semi-rural area and next to water, lighting could have a big](#)  
274 [impact and so needs to be fully justified and well designed.](#)

275 **Reasonable alternative options**

- 276 1) An alternative option would be to keep the original policy and not mention light  
277 pollution or the design guide within the policy itself.  
278 2) Another option would be to not have a policy.

279 **Sustainability appraisal summary**

280 The following is a summary of the assessment of the policy.

A: No policy	0 positives. 0 negatives. 7 ? Uncertain impact as policy elements could be covered by other policies.
B: Keep original policy.	6 positives. 0 negatives. 0 ? Overall positive.
C: Preferred Option - amend policy to improve reference to light pollution and the design guide.	7 positives. 0 negatives. 0 ? Overall positive.

281 **How has the existing policy been used since adoption in May 2019?**

282 According to recent Annual Monitoring Reports, the policy has not been used.

283 **Why has the alternative option been discounted?**

284 The stronger wording relating to light pollution is favoured when compared to the original  
285 to ensure the dark skies of the Broads are protected in this edge of settlement location.  
286 Mentioning the Design Guide is also important given the type of buildings in this area.

287 **UN Sustainable Development Goals check**

288 This policy meets these [UN SD Goals](#):

**15** LIFE  
ON LAND



**9** INDUSTRY, INNOVATION  
AND INFRASTRUCTURE



289 **Policy [POTSA5: River Green Open Space](#)**  
 290 **Policy Map 12 and inset map**  
 291 The area of River Green, as defined on the Adopted Policies Map, is allocated as open space  
 292 and will be kept open for its contribution to amenity, townscape, and recreation.

- 293 **Constraints and features**
- 294 • Area is within Thorpe St. Andrew Conservation Area.
  - 295 • Flood risk (zone 2 by EA 2012 mapping; zones 2, 3a & modelled 3b by SFRA 2017  
 296 mapping).
  - 297 • River Green includes safeguarded minerals (sand and gravel) resources, but the Minerals  
 298 Planning Authority has advised this is compatible with the open space designation,  
 299 subject to no permanent buildings being erected.

300 **Reasoned Justification**  
 301 River Green is an important amenity, part of the local street-scene, and part of the Thorpe  
 302 St. Andrew Conservation Area. It also provides public access to the riverside and views of  
 303 the river and Thorpe Island, within easy reach of a large population. Continued protection of  
 304 this area is thus warranted.

305 **Reasonable alternative options**  
 306 An alternative option could be to not have a policy. This policy could be protected by other  
 307 policies in the Local Plan and the Neighbourhood Plan (when made).

308 **Sustainability appraisal summary**  
 309 The following is a summary of the assessment of the policy.

A: Preferred Option	3 positives. 0 negatives. 0 ? Overall positive.
B: No policy	0 positives. 0 negatives. 3 ? Overall positive.

310 **How has the existing policy been used since adoption in May 2019?**  
 311 According to recent Annual Monitoring Reports, the policy has not been used.

312 **Why has the alternative option been discounted?**  
 313 Given that the area is not an allocated open space and given the importance of the area to  
 314 this part of the Broads, it seems prudent to have a policy that seeks protection.

315 **UN Sustainable Development Goals check**  
 316 This policy meets these [UN SD Goals](#):



317 **Sustainability Appraisal**

318 SA objectives:

- 319 • ENV1: To reduce the adverse effects of traffic (on roads and water).
- 320 • ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to  
321 use water efficiently.
- 322 • ENV3: To protect and enhance biodiversity and geodiversity.
- 323 • ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and  
324 towns/villages.
- 325 • ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- 326 • ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and  
327 coastal change.
- 328 • ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- 329 • ENV8: To minimise the production and impacts of waste through reducing what is wasted, and  
330 re-using and recycling what is left.
- 331 • ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and  
332 their settings
- 333 • ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable  
334 and reflects local distinctiveness.
- 335 • ENV11: To improve air quality and minimise noise, vibration and light pollution.
- 336 • ENV12: To increase the proportion of energy generated through renewable/low carbon  
337 processes without unacceptable adverse impacts to/on the Broads landscape
- 338 • SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- 339 • SOC2: To reduce poverty, inequality and social exclusion.
- 340 • SOC3: To improve education and skills including those related to local traditional industries.
- 341 • SOC4: To enable suitable stock of housing meeting local needs including affordability.
- 342 • SOC5: To maximise opportunities for new/ additional employment
- 343 • SOC6: To improve the quality, range and accessibility of community services and facilities and to  
344 ensure new development is sustainability located with good access by means other than a  
345 private car to a range of community services and facilities.
- 346 • SOC7: To build community identity, improve social welfare and reduce crime and anti-social  
347 activity.
- 348 • ECO1: To support a flourishing and sustainable economy and improve economic performance in  
349 rural areas.
- 350 • ECO2: To ensure the economy actively contributes to social and environmental well-being.
- 351 • ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy,  
352 society and the environment.

353 Assessment of policies

354 Policy POTSA1: Cary's Meadow

		A: Keep original policy	B: Amend policy to improve reference to cycle parking	C: No policy
ENV1			+ Policy refers to cycle parking.	?
ENV2				
ENV3	+	Policy aims to protect and enhance this site which is a rather unique open space in the Norwich area.	+ Policy aims to protect and enhance this site which is a rather unique open space in the Norwich area.	?
ENV4	+	Policy aims to protect and enhance this site which is a rather unique open space in the Norwich area.	+ Policy aims to protect and enhance this site which is a rather unique open space in the Norwich area.	?
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1	+	The Meadow is used by the public with benefits to health and wellbeing.	+ The Meadow is used by the public with benefits to health and wellbeing.	?
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.

		A: No specific policy.	B: Keep original policy	C: Preferred Option - amend policy to improve reference to light pollution and the design guide
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy reflects the restriction of the bridge.	+ Policy reflects the restriction of the bridge.
ENV2			+ Policy refers to water quality.	+ Policy refers to water quality.
ENV3				
ENV4	?		+ Policy requirements generally seek to protect and enhance landscape character.	+ Policy requirements generally seek to protect and enhance landscape character.
ENV5			+ Policy refers to flood risk.	+ Policy refers to flood risk.
ENV6				
ENV7				
ENV8				
ENV9	?		+ Policy refers to the heritage assets in the area.	+ Policy refers to the heritage assets in the area.
ENV10	?		+ Policy refers to design.	+ Policy refers to design and the Design Guide.
ENV11	?			+ Policy refers to light pollution.
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1	?			
ECO2	?			
ECO3	?		+ The policy generally supports boat yard uses in the area.	+ The policy generally supports boat yard uses in the area.

		A: No specific policy.	B: Keep original policy	C: Preferred Option - amend policy to improve reference to light pollution and the design guide		
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+	Policy reflects the lane’s constraints and the junction with the main road.	+	Policy reflects the lane’s constraints and the junction with the main road.
ENV2						
ENV3						
ENV4	?		+	Policy requires landscape improvements to the area.	+	Policy requires landscape improvements to the area.
ENV5						
ENV6						
ENV7						
ENV8						
ENV9	?		+	Policy refers to the heritage assets in the area.	+	Policy refers to the heritage assets in the area.
ENV10	?		+	Policy refers to design.	+	Policy refers to design and the Design Guide.
ENV11	?				+	Policy refers to light pollution.
ENV12						
SOC1						
SOC2						
SOC3						
SOC4						
SOC5						
SOC6						
SOC7						
ECO1	?					
ECO2	?	+	The policy generally supports boat yard uses in the area.	+	The policy generally supports boat yard uses in the area.	
ECO3	?					



		A: No specific policy.	B: Keep original policy	C: Preferred Option - amend policy to improve reference to light pollution and the design guide
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy reflects the lane's constraints and the junction with the main road.	+ Policy reflects the lane's constraints and the junction with the main road.
ENV2				
ENV3				
ENV4	?		+ Policy reflects the semi-rural character of the area.	+ Policy reflects the semi-rural character of the area.
ENV5				
ENV6	?		+ Flood risk is referred to in the policy.	+ Flood risk is referred to in the policy.
ENV7	?		+ Policy seeks no new development, but allows replacements and extensions.	+ Policy seeks no new development, but allows replacements and extensions.
ENV8				
ENV9				
ENV10	?		+ Policy refers to design.	+ Policy refers to design and the Design Guide.
ENV11	?			+ Policy refers to light pollution.
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1	?			
ECO2	?			
ECO3	?		+ The policy generally supports boat yard uses in the area.	+ The policy generally supports boat yard uses in the area.

359 Policy POTSA5: River Green Open Space

360 There are no reasonable alternatives identified at this stage.

		A: Keep original policy	B: No specific policy.	
ENV1			Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	
ENV2				
ENV3				
ENV4	+	The open space is an area important to the local character.		?
ENV5				
ENV6				
ENV7				
ENV8	+	The open space is an area important to the local character (which is a Conservation Area).		?
ENV9				
ENV10				
ENV11				
ENV12				
SOC1	+	The area will benefit the health and wellbeing of the community and visitors.		?
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				



**Local Plan for the Broads - Review  
Preferred Options bitesize pieces  
June 2023**

**Drainage Mills**

This is a proposed draft section/policy for the Preferred Options Local Plan. Member’s comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

- 1 **Policy POSSMILLS: Drainage Mills**
- 2 **Main Map (NE, NW, & S), and various Inset Maps**
- 3 1. The area’s ~~heritage of traditional~~ drainage mills, and drainage mill remains, will be conserved.
- 4 2. Proposals that will maintain, repair and restore ~~and, in appropriate cases re-use standing~~
- 5 drainage mills ~~will be judged against the following criteria: Historic significance, survival of~~
- 6 ~~historically significant fabric (e.g. machinery, location, group value, fragility), and vulnerability of~~
- 7 ~~structure~~ and associated buildings will be supported subject to the criteria outlined below.
- 8 3. In appropriate cases re-use, and in exceptional circumstances, securing the repair of listed mills
- 9 through enabling development, will be supported subject to the criteria outlined below. Where
- 10 enabling development is considered acceptable the timing of the repair of the mill and
- 11 associated buildings will be secured through a planning obligation or Section 106 Agreement.
- 12 4. ~~Proposals that will maintain, repair, restore, drainage mills and associated buildings will be~~
- 13 ~~supported subject to the criteria outlined below. The timing of the repair of the mill and~~
- 14 ~~associated buildings will be secured through a planning obligation or Section 106 Agreement.~~
- 15 5. In all cases, proposals relating to standing mills will be judged against the following criteria:
- 16 a) The historic significance of the individual mill and group value,

- 17 b) The survival of historically significant fabric (e.g. machinery),  
18 c) Suitable location and access,  
19 d) Fragility, and vulnerability of the structure. A structural survey will need to be submitted  
20 assessing the current stability and assess how the mill and associated buildings can be made  
21 stable and restored,  
22 e) Any proposal relating to mills will have to be of the highest standard of design and materials.  
23 f) Impact on the significance and setting of the heritage asset and wider landscape  
24 g) Impact on biodiversity. Works will, if necessary, be required to be timed to ensure no  
25 disturbance to breeding or wintering birds.  
26 h) Also, depending on the proposal, impacts from recreation and waste water may need to be  
27 mitigated.  
28 i) Impact on water. If proposals will result in a mill being operational, the impact on water flow in  
29 the area will need to be assessed and understood.  
30 j) The impact on dark skies and production of light pollution.

31 ~~Any works to mills will be assessed for impacts on heritage (significance and setting), water (such as~~  
32 ~~resource, quality, and flow), and biodiversity.~~

### 33 **Constraints and features**

- 34 • The mills are all either listed buildings or on the Local List.
- 35 • Many of the mills are:
  - 36 ○ in Conservation Areas.
  - 37 ○ in SAC, SPA, Ramsar, CWS, etc and also their zones of influence.
  - 38 ○ In nutrient neutrality areas.
- 39 • Most of the mills are
  - 40 ○ at high risk of flooding.
  - 41 ○ In dark areas of the Broads.

### 42 **Reasoned Justification**

43 Drainage mills are a defining feature of the historic landscape of the Broads and contribute  
44 significantly to its landscape character, viewed from both land and water. The mills tend to  
45 be the largest and most obvious structures in the flat, open landscape and are often located  
46 in groups of significant visual amenity to the Broads. The mills vary in size and design but all  
47 had the fundamental purpose of draining water from the land to enable the fields to be  
48 grazed and latterly to be used for other agricultural uses. They therefore contribute to our  
49 understanding of the Broads' cultural heritage.

50 Of the ~~74~~ approximately 80 standing mills in the Broads, about 50 are listed and the rest are  
51 locally listed. Many mills are intrinsically historically significant and contain machinery that  
52 represents innovation or is the last example of technology. ~~Many are remote and located in groups~~  
53 ~~of significant visual amenity to the Broads, and epitomise its cultural landscape. Approximately 30~~  
54 ~~structures are neglected and require active conservation of fabric. Change of use is often a solution~~  
55 ~~to the problem of neglect and can result in repair work being implemented and funded, giving a~~  
56 ~~structure a sustainable future. However, work that will outweigh the benefit of bringing a structure~~  
57 ~~into use by the amount of harm caused to its historic fabric cannot be justified~~

58 Redundancy, exposure to elements and vulnerability to vandalism mean a number of the

59 mills are recorded locally and nationally as being 'at risk'. Halvergate Marshes Conservation  
60 Area, which contains many of the drainage mills, is the only Conservation Area in the Broads  
61 that is 'at risk' and is included on Historic England's Heritage at Risk Register.

62 A significant number of the mills are neglected and require repair. Due to their remote  
63 locations with limited access, usually in areas at risk of flooding, proposals for restoration  
64 are not easy to develop and can be costly.

65 The policy encourages the repair and restoration of standing mills. In cases where there are  
66 archaeological remains only, the relevant local and national policies will apply.

67 However, some mills are now mainly of landscape value; these mills are in a particularly  
68 vulnerable or fragile condition and could potentially be lost to the Broads' landscape. The  
69 consolidation and repair of these mills is encouraged to ensure that they can continue to  
70 contribute to the landscape. ~~In some cases, it may be acceptable to seek alternative uses for those~~  
71 ~~mills which are more accessible, are of lesser historic and greater landscape importance, and~~  
72 ~~contain little or no significant machinery. In such cases, re-use may be appropriate, as long as the~~  
73 ~~positive landscape contribution of such mills is retained and enhanced through their creative~~  
74 ~~conservation.~~

75 In some cases, it may be acceptable to seek alternative uses for mills, in order to ensure that  
76 the structure is repaired and has a sustainable future. It is likely that these mills will be  
77 more accessible and may be of less historic significance with little or no internal machinery.  
78 In such cases, re-use may be appropriate, as long as the positive landscape contribution of  
79 such mills is retained, their setting and significance is preserved and enhanced through their  
80 creative conservation and alterations do not cause harm to the historic fabric (and other  
81 planning policy requirements, for example in relation to flood risk, are met).

82 Where an alternative use is not considered acceptable (for example, where a listed mill  
83 retains its original fabric, machinery and character and harm may be caused to its  
84 significance through a change of use), it may be appropriate to secure the repair of listed  
85 mills through enabling development. This will only be permitted where it will secure the  
86 long-term conservation of a designated heritage asset at risk; where this can only be  
87 achieved through enabling development and when the proposal complies with the Historic  
88 England guidance on Enabling Development. The timing and repair of the mill and any  
89 associated structures would be secured via a Section 106 Agreement or planning obligation.

90 ~~There is an action plan for each mill (Broads Mill Action Plans). Short to medium term~~  
91 ~~actions are to make the mills safe and prevent further loss or damage to the structures,~~  
92 ~~while longer-term actions seek betterment, such as restoring any missing elements like masts~~  
93 ~~stocks and sails. Mill owners may wish to refer to the Mill Action Plans when developing~~  
94 ~~proposals for repair, maintenance, restoration, or re-use.~~

95 ~~The mills are in varying conditions, according to the Drainage Mill Action Plan (Broads Authority).~~  
96 This policy gives a general framework to guide decisions. As set out above, what is  
97 appropriate for one mill will not be for another, and expert advice will be required to help  
98 assess applications for changes to mills.

99 ~~Due to their isolated location, usually in areas at risk of flooding, as well as the extent of works~~  
100 ~~required to restore some of the mills, proposals for restoration are not easy to develop and can be~~  
101 ~~costly. The mills tend to be the largest and most obvious structures in the flat, open landscape. The~~  
102 ~~Authority supports the restoration of the mills or, in some cases, works that enable their neglect to~~  
103 ~~be arrested, subject to the historic interest of the structure not being compromised.~~

104 The Environment Agency highlights the potential need for a range of consents, to avoid  
105 adverse impacts on fish, flooding and water flows.

106 The re-use of historic buildings policy (DM12) and conversion of buildings policy (DM48)  
107 may also be of relevance to proposals for mills. Further, to reflect that mills tend to be in isolated,  
108 rural areas, proposals will need to meet the requirements of policy DM22 in relation to light  
109 pollution.

110 The policy highlights that, depending on the proposals, the scheme may also need to mitigate  
111 recreation impacts and this is most easily done through paying the GI RAMS tariff. Depending on  
112 the type of scheme and the location of the mill, the impact of the scheme on nutrient enrichment  
113 may need considering.

114 ~~The Authority is progressing its bid for Heritage Lottery Funding. A key aim of the project as a whole~~  
115 ~~is to remove Halvergate Marshes Conservation Area from the Historic England 'At Risk' Register.~~  
116 ~~Specific projects will include works to a number of Broads' drainage mills, from weatherproofing~~  
117 ~~and fabricating new caps and sails to halting their further decline, and developing a model for~~  
118 ~~future management and maintenance of the drainage mills. The Heritage Construction Skills~~  
119 ~~Training project will embed heritage skills training into existing construction skills curricula at~~  
120 ~~colleges, and provide opportunities for students to specialise in heritage construction skills and~~  
121 ~~achieve industry recognised standards and qualifications.~~

## 122 Reasonable alternative options

- 123 a) An alternative option would be to keep the original policy.  
124 b) No policy

## 125 Sustainability appraisal summary

126 The three options (of the amended policy and the original policy and no policy) have been assessed  
127 in the SA. The following is a summary.

A: Keep original policy	4 positives. 0 negatives. 0 ?
B: Preferred Option – amended policy	7 positives. 0 negatives. 0 ?
No policy	0 positives. 0 negatives. 7 ?

## 128 How has the existing policy been used since adoption in May 2019?

129 According to recent Annual Monitoring Reports, the policy has been used and schemes were in  
130 conformity.

## 131 Why has the alternative option been discounted?

132 Given the importance of mills to the area, not to have a policy is not the preferred approach. The  
133 changes reflect lessons learned over the last few years and help make the policy clearer, stronger  
134 and improves the protection of the mills and is therefore favoured.

135 **UN Sustainable Development Goals check**

136 This policy meets these [UN SD Goals](#):

137 None identified

138 **Sustainability Appraisal**

139 SA objectives:

- 140 • ENV1: To reduce the adverse effects of traffic (on roads and water).
- 141 • ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to  
142 use water efficiently.
- 143 • ENV3: To protect and enhance biodiversity and geodiversity.
- 144 • ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and  
145 towns/villages.
- 146 • ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- 147 • ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and  
148 coastal change.
- 149 • ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- 150 • ENV8: To minimise the production and impacts of waste through reducing what is wasted, and  
151 re-using and recycling what is left.
- 152 • ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and  
153 their settings
- 154 • ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable  
155 and reflects local distinctiveness.
- 156 • ENV11: To improve air quality and minimise noise, vibration and light pollution.
- 157 • ENV12: To increase the proportion of energy generated through renewable/low carbon  
158 processes without unacceptable adverse impacts to/on the Broads landscape
- 159 • SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- 160 • SOC2: To reduce poverty, inequality and social exclusion.
- 161 • SOC3: To improve education and skills including those related to local traditional industries.
- 162 • SOC4: To enable suitable stock of housing meeting local needs including affordability.
- 163 • SOC5: To maximise opportunities for new/ additional employment
- 164 • SOC6: To improve the quality, range and accessibility of community services and facilities and to  
165 ensure new development is sustainability located with good access by means other than a  
166 private car to a range of community services and facilities.
- 167 • SOC7: To build community identity, improve social welfare and reduce crime and anti-social  
168 activity.
- 169 • ECO1: To support a flourishing and sustainable economy and improve economic performance in  
170 rural areas.
- 171 • ECO2: To ensure the economy actively contributes to social and environmental well-being.
- 172 • ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy,  
173 society and the environment.



174 Assessment of policy

		<b>A: Keep original policy</b>	<b>B: Preferred Option – amended policy</b>	<b>No policy</b>	
ENV1			+	Policy refers to location and access.	?
ENV2	+	Policy refers to water quality and flow.	+	Policy refers to water quality and flow.	?
ENV3	+	Seeks protection of the natural environment.	+	Seeks protection of the natural environment.	?
ENV4	+	Mills are an important part of the landscape character.	+	Mills are an important part of the landscape character.	?
ENV5					
ENV6					
ENV7					
ENV8					
ENV9	+	Fundamentally, the mills are heritage assets.	+	Fundamentally, the mills are heritage assets.	?
ENV10			+	Refers specifically to the design of any schemes for the mills.	?
ENV11			+	Refers to light pollution.	?
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1					
ECO2					
ECO3					

Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.



**Local Plan for the Broads - Review**

**Preferred Options bitesize pieces**

**June 2023**

**Electric Vehicle Charging Points**

**Information for Planning Committee Members.**

The Issues and Options document discussed the need for a standard and threshold relating to electric vehicle charging points. The proposal to not have a standard, given that it is addressed through Building Regulations, tended to be supported. Comments are included below. As such, the policy does not address a threshold, but rather raises another issue that is not addressed by Building Regulations – location and fire risk.

**Comments received as part of the Issues and options consultation:**

Question 8: Do you have any thoughts on electric vehicle charging points and the Local Plan?

<b>Organisation</b>	<b>Comment</b>	<b>Response</b>	<b>For next version of Local Plan</b>
Bradwell Parish Council	If electric vehicle charging points can be provided without a major impact on the broads then they should be implemented.	Noted.	Consider this comment as produce the Preferred Options and any policy on parking.
Broads Society	The Society agrees with the approach to not set a standard for electric vehicle charging points in the new Local Plan for the Broads. However, it is important that electric vehicle points, where proposed, are viewed positively within planning applications where sustainable travel is being encouraged to enable businesses to react to changing market conditions and environmental impacts.	Noted. Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce the Preferred Options and any policy on parking.
Brooms Boats	Standards for electric vehicle charging should be outside of the Local Plan.	Support to the approach of not setting a standing in	No further action.

Organisation	Comment	Response	For next version of Local Plan
		the Local Plan noted.	
Brooms Boats	It is important that electric vehicle points, where proposed, are viewed positively within planning applications where sustainable travel is being encouraged to enable businesses to react to changing market conditions and environmental impacts.	Noted.	Consider this comment as produce the Preferred Options and any policy on parking.
Designing Out Crime Officer, Norfolk Police	Residential parking spaces should be perpendicular and to the front of dwellings they are meant to serve, in order to maximise the opportunities for natural surveillance. This feature will become more relevant with the increase of the electric charging of vehicles on driveways. This should be factored in when designing new housing developments in line with SBD guidelines.	Noted. This is more for design policy.	Ensure design policy refers to SBD standards and guidelines.
East Suffolk Council	As is correctly set out in the consultation document, under Building Regulations a new residential building with associated parking is required to provide an EV charging point. However we would still recommend requiring EV charging points on developments with on-plot parking as part of planning policy. Consideration could also be given for EV charging provision in community buildings, e.g. village halls and public car parks. A position on on-street/ lamppost EV chargers could also be included.	Noted.	Consider this comment as produce the Preferred Options and any policy on parking.
RSPB	Will this be incentivised? If electric vehicle charging points aren't developed in line with proposed removal of fossil fuel powered vehicles there is likely to be competition for this service.	Noted, but this seems more a national issue and not one	No further action.

Organisation	Comment	Response	For next version of Local Plan
		which the Local Plan can address.	
Sequence UK LTD/Brundall Riverside Estate Association	2.20 Agree with the approach set out within the consultation to not set a specific policy as this is covered within the building regulations.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
South Norfolk Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV charging points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
Suffolk County Council	Suffolk County Council suggests reference is made to the Suffolk Guidance for Parking which provides further information on electric vehicle charging points.	Noted. Refer to Suffolk and Norfolk CC parking guidance.	Refer to Suffolk and Norfolk CC parking guidance.
Broadland Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV charging points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.

## Proposed policy

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

This is a new policy and will only take effect once the Local Plan is adopted.

### **Policy PO DMxx: Electric Vehicle Charging Points and fire safety**

1. Proposals that include the installation of electric vehicle charging points are welcome but they need to consider the location of such charging points.
2. Electric vehicle charging points should be placed where the impact of any vehicle or battery igniting/vapour cloud explosion hazard is minimal and to some extent, deemed acceptable. Considerations may include the risk of the spread of fire, and if the fire would prevent escape.
3. In terms of electric scooter or bicycle charging, provision in a suitable location for charging of these batteries should be included in a scheme and should be placed where the impact of any vehicle or battery igniting/vapour cloud explosion hazard is minimal and to some extent, deemed acceptable. Considerations may include the risk of the spread of fire, and if the fire would prevent escape.

### **Reasoned justification**

The risks of an electric vehicle fire are that:

1. It occurs very rapidly without much warning;
2. The fires are very hot and intense and cannot be easily extinguished and can reignite; and
3. The nature of the thermal runaway process is that a lot of very dangerous smoke is produced.

Electric vehicle fires can occur when a battery is damaged, or if there is overcharging. Overcharging should be prevented by software and some technical blocks. However;

- a) Software can fail
- b) If a battery is used with a charger that doesn't match the battery chemistry, it can cause a failure.

At the time of writing, whilst there are regulations addressing the number of charging points for certain developments<sup>1</sup> (and hence no policy is included in the Local Plan relating to that issue), there are no regulations that raise or address the fire risk of electric vehicles. As such, the Authority includes a related policy to ensure applicants consider the location of charging points. If, during the production of this Local Plan, regulations are put in place that address the locations of charging points, the policy may not be required.

When considering the location of electric charging points, applicants should think about where is best should the battery/vehicle ignite. It is recommended that this is ideally away from property, and not inside a residential house.

The other safety issue highlighted in this policy is charging of e-bikes and e-scooters. A half kWh battery for example can produce 3000L of smoke very quickly, and is powerful enough to devastate a house. A particular concern is the charging of e-scooters and e-bikes in access areas. Provision for charging of such batteries, again in an area where it is deemed acceptable if they were to ignite, should be considered.

### **Reasonable alternative options**

a) No policy

### **Sustainability appraisal summary**

The two options (of no policy and the preferred option) have been assessed in the SA. The following is a summary.

A: No policy	0 positives. 0 negatives. 1 ?
B: Preferred Option	1 positives. 0 negatives. 0 ? Overall, positive.

### **Why have the alternative options been discounted?**

Given the move towards electric vehicles, given the Building Regulations standard in terms of how many and on what property type, but no regulations relating to fire impact and given the issue of batteries/vehicles igniting, a Local Plan response is deemed reasonable and preferred.

### **UN Sustainable Development Goals check**

This policy meets these [UN SD Goals](#):

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<sup>1</sup> [Infrastructure for charging electric vehicles: Approved Document S - GOV.UK \(www.gov.uk\)](#) – Document S.

**3** GOOD HEALTH  
AND WELL-BEING



## Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.



### Assessment of policy

		A: No policy	B: Preferred Option - amend policy	
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>		
ENV2				
ENV3				
ENV4				
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1	?			+ Fundamentally, the policy would hopefully result in fewer fires with devastating outcomes.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				