

Consultation Documents Update and Proposed Responses
Report by Planning Policy Officer

Summary: This report informs the Committee of an officer response to a recent planning policy consultation.

Recommendation: That the report be noted.

1 Introduction

1.1 Appendix 1 shows, for information, a recent officer response to consultation, which timescales prevented reporting to the Planning Committee in advance of the response being made.

2 Financial Implications

2.1 There are no financial implications.

Background papers: None

Author: John Clements
Date of report: 12 April 2012

Broads Plan Objectives: None

Appendices: APPENDIX 1 – Planning Policy Consultation response issued

Planning Policy Consultation Response Sent

ORGANISATION:	Marine Management Organisation
DOCUMENT:	Draft Vision and objectives for East marine plans.
LINK	http://www.marinemangement.org.uk/marineplanning/documents/vision_objectives.pdf
RECEIVED:	27 March 2012
DUE DATE:	20 th April 2012
STATUS:	Response already issued.
PROPOSED LEVEL:	Officer
NOTES:	<p>Note that this consultation response has already been sent.</p> <p>The document is part of a process of taking forward a new planning regime for managing marine inshore and offshore areas. Because the marine planning area includes tidal rivers, much of the Broads' waterways falls within the ambit of the future marine plans for the East. (The East Coast is the first of a series of plans to cover the whole coast of England.)</p>
RESPONSE MADE:	<p>The Broads Authority welcomes the consultation on this document and offers the following comments.</p> <ol style="list-style-type: none"> 1) The Marine Management Organisation has a legal obligation (<i>under the Norfolk and Suffolk Broads Act 1988, as amended</i>), in exercising or performing any functions in relation to, or affecting, land in the Broads, to have regard to the purposes of <ol style="list-style-type: none"> a) Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads; b) Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and c) Protecting the interests of navigation. 2) The Broads is a nationally designated area with status equivalent to a national park, the highest level of landscape protection, and a wetland of international importance. A significant part of this area falls within the marine planning zone. 3) The Broads Authority is a special purpose statutory authority responsible for managing the designated Broads area for the purposes listed under paragraph one, above. The Broads Authority is also the

	<p>navigation authority and the local planning authority for the Broads.</p> <p>4) The Authority's main concern in respect of the Vision and Draft Objectives is to ensure that their effect on the Broads (both through that part of it covered by the marine plan, and the remainder which is proximate) is positive, and that to ensure that the Broads' importance and the great sensitivity of many of its special features are fully appreciated, protected and, where possible, enhanced.</p> <p>5) There seems a general lack of East specific content in the Vision and Objectives. In numerous places there are generalised references to issues, rather than to their particular form or implications for the specific area of coast involved. There would appear to be a great deal of work remaining to be done if the plan is to be fully effective and meaningful.</p> <p>6) The process for producing the plan, so far as it is outlined in the document, seems overly simplistic and lacking the degree of iteration (and probably early review) likely to be needed if the plan is to be effective and accepted, notwithstanding the note about overlap and iterations between stages.</p> <p>7) The Vision, apart from the inclusion of the word 'East', could be anywhere. The reference to increasing the confidence of business and decision makers appears to overlook the major uncertainties, particularly in relation to climate change impacts on the coast and the potentially severe knock on impacts, e.g. on the tidal waters (and much else) in the Broads if the very vulnerable coast is breached.</p> <p>8) The Authority would wish to see Draft Objective 6 substantially reworded, and focused on conserving and enhancing cultural heritage assets and their setting, rather than just avoiding harm. The current wording, focusing on 'recognising' assets (what does that mean?), is muddled and carries no clear meaning.</p> <p>9) The Authority would wish to see the Broads, and its national park equivalent status, specifically mentioned in Policy 6.2</p> <p>10) The Authority welcomes the references in and under Objective 8 to the relationships between biodiversity within and without the marine plans area.</p> <p>11) There remains a great deal of doubt about how, and to what extent, the East marine plans will relate to existing plans, and for the Broads</p>
--	---

in particular, the Broads Plan (a strategic management plan for the area) and the Broads Local Development Framework. The text of the related section does not appear much focused on the East area. The reference to a national park management plan (though welcome) would more accurately refer to the management plan for the Broads (currently the Broads Plan). The references to local development plans, frameworks, core strategies, etc. , does not appear to be based on full awareness of the meanings and, admittedly complex, relationships and overlaps between them (or the preference of current Government policy for calling them all 'local plans).

12) The Broads Authority will welcome continuing consultation on the emerging East marine plans.