

**Broads Local Plan: Issues and Options**  
Report by Planning Policy Officer

**Summary:**

This report introduces the Broads Local Plan Issues and Options Stage. This is the first stage in the preparation of a draft Local Plan and highlights the key topics which future planning policies will be required to cover. It also outlines some options for the direction of that planning policy. Local Planning Authorities are required to undertake public consultation at specific stages of plan preparation and it is anticipated that the Issues and Options will be the subject of a public consultation beginning in February 2016, after consideration by the full Authority in January. The views of Navigation Committee Members are requested on the navigation aspects of the draft options.

**1 Introduction**

- 1.1 Local Planning Authorities are required to prepare a Local Plan which will define planning policies within its local planning authority area. These are given significant weight when deciding planning applications as all decisions are required to be made in accordance with the policies unless there are strong material reasons not to. Local plans must be positively prepared, justified, effective and consistent with national policy
- 1.2 The National Planning Policy Framework (NPPF) (The Framework) states that every local planning authority in England should have a clear, up to date Local Plan, which conforms to the Framework, meets local development needs, and reflects local people's views of how they wish their community to develop. The process should fully involve everyone who has an interest in the document or area and they should have had the chance to comment.
- 1.3 The Broads Authority has three adopted Planning Policy documents: The Core Strategy, Development Management Document and the Sites Specifics Local Plan. Some of the policies have existed since 2007 and are not fully in line with Government policy now. As such, we are reviewing all our current policies and looking into new issues as we produce a new and up to date Local Plan.
- 1.4 For the avoidance of doubt, until the new Local Plan is adopted, the existing adopted and saved policies are in place and will be used in determining planning applications.

## 2 The Issues and Options Stage

- 2.1 This is the first stage of producing a Local Plan. The document identifies issues and discusses potential options to address that issue. The purpose of the consultation is to ensure that all potential issues have been covered and to seek views on the appropriate approaches to those issues.
- 2.2 At this stage, there is no policy content. Potential policy content is discussed at a high level. It is for the next stage of the Local Plan (Preferred Options) to come up with potential policy wording.
- 2.3 The following table shows the Local Plan production process.

Broads Local Plan Process

Sustainability Appraisal and Habitats Regulation Assessment	1: Identify issues	Review existing policies and identify any gaps in policies.
	2: Collect evidence	Research that will inform and influence the Local Plan.
	3: Consult (Issues and Options)	The Authority will inform stakeholders and the public that the Local Plan is being produced and ask for views on what the plan should cover. Minimum of 6 week consultation period.
	4: Prepare Draft Plan	The evidence and comments received help produce a draft Local Plan.
	5: Consult (Preferred Options)	The Authority will consult with stakeholders and the public on the draft Local Plan for a minimum of 6 weeks.
	6: Improve Plan	The Authority will take on board comments received and any further evidence as they improve the Local Plan.
	7: Publish Plan (Publication)	The plan is available for stakeholders and the public to comment on for a minimum of 6 weeks. (Regulation 19)
	8: Submit	The Authority will assess the comments received. If it considers that the Local Plan is sound, it can submit the Plan to the Planning Inspectorate. If the Authority wishes to improve the plan, then stages 6 and 7 are repeated.
	9: Examine	The Plan is examined by an independent Planning Inspector. There may be Public Hearings.
	10: Adopt	If the independent Planning Inspector finds the Local Plan sound, the Plan can be adopted by the Authority. If the Inspector does not find the Local Plan sound, the process goes back to stage 6.

## 3 About the Issues and Options

- 3.1 Whilst the document is 150 pages long, this is an early stage on the production of the Local Plan and Members have the opportunity to input. Any relevant comments that are made will be incorporated into the document which will go out to public consultation in early 2016.

- 3.2 This report identifies some particular issues that could be of interest to Navigation Committee. Page numbers refer to the page of the Issues and Options document:

Challenges and Opportunities – Page 20

This section sets out a SWOT analysis (Strength, Weaknesses, Opportunities and Threats) of the Broads.

Climate Change – Page 45

The low-lying and coastal nature of the Broads and the dominance of water in the landscape make it particularly vulnerable to the effects of climate change and sea level rise. To address the issue of Climate Change, the following options are discussed.

- Option 1: Roll forward existing policy CS8.
- Option 2: Climate Change Ready and Carbon Reduction guide that covers adaptation, resilience and mitigation.
- Option 3: Scoping of development type and scale. Would scope out need for further action relating to climate change to reflect type and scale of development.
- Option 4: Require an assessment as part of applications showing how Climate Change mitigation and adaptation have been incorporated into the design of the proposal.
- Option 5: community or landscape scale mitigation or adaptation. Could be a monetary contribution to a pot.

The Broads Economy – Page 138

This section identifies that the main economies in the Broads are agriculture, tourism and boat related industries. One particular issue discussed by the document is on the subject of boatyards. The Authority is aware of the potential for boatyards to operate some functions away from the water. The options discussed to address these sites if vacated are:

- Option 1: no change to the existing policy approach (DP20)
- Option 2: Less restrictive policy which would allow other uses on these sites
- Option 3: Seek to retain sites in employment use. Similar to DP20, but would allow any employment use rather than just relating to boat yards.
- Option 4: Promote starter units if buildings become redundant.

Tourism – Page 143

Tourism is important to the Broads and the Authority is seeking to address tourism further through the Local Plan.

- Option 1: No new policy.
- Option 2: Seek to retain tourist facilities (General presumption of protecting, retaining and enhancing tourist facilities in the Broads).

The views of the Navigation Committee on ways to support and diversify the tourism base of the Broads would be welcome.

Residential Moorings – Page 90 and 163

The Authority's current approach is set out in DP25. A main requirement of this policy is for the proposal to be within or adjacent to a development boundary. This requirement means that services and facilities that people

tend to use (like GPs, shops and pharmacies) are easily accessible. The Sites Specifics Local Plan identifies some areas that do not have development boundaries, but are suitable for residential moorings because of the facilities and services nearby. The call for residential moorings seeks other areas of the Broads which meet the criteria of DP25 but may not have development boundaries.

#### Navigation – Page 145

This section refers to the Riverbank Stabilisation Guide and Moorings Design Guide. This section also discusses the current policy approach as set out in DP16 which sets a requirement for at least 10% or 2 in number of new moorings to provide visitor short stay moorings for the public to use. The options are:

- Option 1: no change to the policy
- Option 2: no policy relating to the provision of visitor moorings as part of a scheme.
- Option 3: improve the existing policy (to include a threshold as well as consider a figure for payment in lieu of moorings)

#### Safety by the Water – Page 148

To date there is no adopted policy direction relating to safety by the water. Accessible safety equipment such as lifebuoys and throw lines are essential just in case they are needed to help someone who is in the water. The Authority wishes to explore the possibility of enshrining safety by water in planning policy

- Option 1: No Policy.
- Option 2: Guidance addressing safety features to consider.
- Option 3: Policy covering detail of safety equipment to be provided at different developments.

## **4 Sustainability Appraisal**

- 4.1 The term “sustainability appraisal” is used to describe a form of assessment that considers the social, environmental and economic effects of implementing a particular plan or planning policy document.
- 4.2 Accompanying the Issues and Options document is an interim Sustainability Appraisal which is also on the subject of consultation. It is not a full appraisal as the Issues and Options document does not have any policy content to assess. This interim stage gives a broad assessment of the impact of a general policy approach.

## **5 Consultation**

- 5.1 The Authority is required to do the following activities to advertise the consultation of the Local Plan:
- a) Write/Email to specific statutory consultees (like Natural England and the Environment Agency).

- b) Write/Email to other consultees the Authority considers should be consulted (such as local groups and others who have expressed an interest in the Local Plan – e.g NSBA, BHBF).
- c) A formal notice in the newspaper.
- d) Place hard copies in accessible venues around the Broads Executive Area and beyond (such as libraries and District Council Offices).
- e) Place the document on the Authority's website.

5.2 At the time of writing, other ways to advertise the consultation are being considered. Some activities could include the options listed below. Firmer proposals will be discussed at Planning Committee with the final proposal discussed and agreed by the Authority at its meeting on 22 January 2016.

- a) A summary leaflet with accessible language for the public to read if they do not want to read the entire document.
- b) An on-line questionnaire to enable the public to give their views.
- c) A short You Tube video aimed at 16 to 24 year olds.
- d) Liaison with Parish Council regarding including the consultation in their Parish newsletters.
- e) An explanatory leaflet about the Broads Plan and Broads Local Plan.
- f) Open days held at venues around the Broads, such as supermarkets.
- g) Un-manned exhibitions.

5.3 It is intended that where relevant, these events and activities will be used to gauge views on the Broads Plan and Broads Local Plan.

## **6 Links with the Broads Plan**

6.1 The Broads Plan is the management plan for the Broads. It is another statutory plan and is being reviewed currently. With similar names, there is great potential for confusion between the Broads Plan and the Broads Local Plan.

6.2 The Authority is consulting on the first versions of these two plans at the same time. That way the Authority can highlight both documents but explain the difference between the two documents. There is also potential to share costs and time during the consultation stage by using the same letters to advertise both consultations for example. As both Plans are statutory plans they will both need to be accompanied by Sustainability Appraisals which will share a number of sustainability objectives.

6.3 The Broads Plan (management plan) has a shorter production process so it is unlikely that later stages of both plan's productions will coincide. But the officers working on the plans will ensure that they continue to liaise to ensure consistency.

## **7 Next Steps**

7.1 The Issues and Options version of the Local Plan will be taken to Planning Committee for their consideration on 8 January 2016.

7.2 Following Planning Committee, the Issues and Options will be taken to the Authority on 22 January 2016 for its consideration. If the Authority agrees, the Issues and Options will then be published for public consultation for 8 weeks. Beginning on the 15 or 22 February 2016. When the consultation ends, the comments will be considered and reported back to members in due course.

## **8 Conclusion**

8.1 The Issues and Options of the Local Plan is the first stage of producing a new Local Plan for the Broads. It identifies issues and considers options to address that issue. This report seeks to explain the process as well as highlight particular issues that might be of particular interest to Navigation Committee members.

Background papers: None

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Broads Plan Objectives: Multiple

Appendices: APPENDIX A - The Broads Local Plan - Issues and Options  
APPENDIX B - Interim Sustainability Appraisal  
Both appendices can be accessed here: <http://www.broads-authority.gov.uk/broads-authority/committees/navigation-committee/navigation-committee-10-december-2015>