



Local Plan for the Broads

Broads Authority response to Matter 2 – Vision, objectives and strategy June 2018

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

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

Questions

- a) Are the vision and objectives suitably framed and do they present a positive framework for the future for the Broads?
 - i. *The Authority believes the vision and objectives do present a positive framework for the future of the Broads especially as the vision is the same as the Broads Plan 2017 which is the statutory management plan for the Broads (document AP5). The Broads Plan and Local Plan are the two key documents for managing the Broads and so to have a consistent approach to the vision ensures a positive framework for the future. The consultation responses received support the vision and objectives (see LP-PUB4 Pre-Submission Consultation Responses - sorted by policy page 21 to 23).*
 - ii. *That being said, changes have been suggested by Norfolk Geodiversity Partnership (see page 22 of LP-PUB4). The Authority agrees with the suggested change to the Broads Local Plan objectives and proposes a change (number 17 of LP-SUB2). The Authority does not however consider a change is needed to the vision itself.*
- b) Is the Plan's vision and overall strategy consistent with the special status of the Broads and the vision and priorities outlined in Government Circular 2010¹?
 - i. *The vision is the same as the vision for the Broads Plan 2017 (AP5) which was informed by the Government Circular 2010, and is therefore consistent with it.*
 - ii. *The Plan's vision is underpinned by a list of special qualities set out at paragraph 8.4, page 24 of the Local Plan, which characterise the special status of the Broads. These special qualities are referred to consistently throughout the document and in many policies.*

¹ English National Parks and the Broads – UK Government Vision and Circular 2010.

- c) Should key areas and features be illustrated on a key diagram?
- i. *Map 1 on page 9 of the Local Plan shows key areas and features such as settlements, rivers and larger urban areas. This map is not labelled as a conventional key diagram because of the distinctive nature of the area and its policies. Because the Broads' area is not comparable to any other usual district area, the Plan does not include a number of the matters that might be expected on a key diagram. For example, there is no settlement hierarchy, no key infrastructure improvements.*
- d) Is the housing spatial strategy in the Plan clearly articulated, justified and in line with national policy?
- i. How will housing growth be distributed across the Authority area, and to what degree will this reflect settlement sustainability?
- A. *Housing growth is distributed in four locations of the Broads. These are at Thurne (PUBTHU1), Oulton Broad (PUBOUL2), Stokesby (PUBSTO1) and Norwich (PUBNOR1).*
 - B. *In relation to settlement sustainability, PUBOUL2 has planning permission and is in the centre of Oulton Broad/Lowestoft which is a major town. PUBNOR1 is in the centre of Norwich which is a city. PUBTHU1 is within a settlement with limited services and facilities, but was allocated through the Sites Specifics Local Plan 2014 (AP3) examination hearings and has been rolled forward from the Sites Specific Local Plan 2014 as it has planning permission. PUBSTO1 is in a settlement with few services and facilities but was assessed through document EB17 Land at Tiedam Stokesby Site Assessment and allocated on balance. See EB28 Settlement Study, section 4, page 4 and 5 for the summary assessment of the service and facilities at each of these settlements.*
 - C. *Furthermore, the sites at PUBTHU1, PUBNOR1 and PUBOUL2 are brownfield regeneration sites.*
 - D. *There are also four development boundaries which are areas where housing development is acceptable in principle (see PUBDM34). The settlements with development boundaries score well when their sustainability credentials are assessed (see EB28 Settlement Study, section 4, page 4 and 5 – highlighted in green in the table). Note that there is a proposed change (LP-PUB4, page 67, rep 246 and proposed change 66 in LP-SUB10) to remove the development boundary at Thorpe St Andrew; this is discussed later in this paper.*
 - E. *This approach seeks to address the issue of social inclusion. Directing residential development to within development boundaries means there is access to the services and facilities that people need or use very regularly.*

Indeed, document EB15 assessed the 2015 Indices of Deprivation and the maps in section 7 (page 10 and 11) show the physical proximity of services and facilities and shows that the Broads is towards the deprived end of the assessment. The oranges, yellows and greens on the map tend to relate to the more urban areas indicating greater access to services and facilities.

- ii. Is the approach to windfall development, based on four settlements with identified development boundaries, soundly based and sustainable? What other options were considered and why were they rejected?
- A. *Yes. As discussed in the previous point (D), the settlements with development boundaries score well when their sustainability credentials are assessed.*
 - B. *The Settlement Study (EB28) shows that there are some other areas which score well in relation to sustainability, but these were not allocated development boundaries. The reasons for allocating some areas a development boundary and not allocating other areas is set out in the Development Boundary Topic Paper (EB7). Also see LP-PO2, page 60 which is the Sustainability Appraisal for the Preferred Options version of the Local Plan, which assesses alternatives to the favoured approach to development boundaries.*
 - C. *As set out in the Housing Supply Topic Paper (document EPS6 – section 4) it is proposed not to include windfall in meeting the housing target. This is because windfall numbers have historically been very variable and in low numbers, making it difficult to reliably predict future windfall.*
- iii. Where settlements lay partly in neighbouring authority areas, is the Broads strategy relating to settlement boundaries consistent with that of adjoining Councils and provides a coherent approach for that settlement?
- A. *The answer is provided below for the following settlement areas with development boundaries respectively: Oulton Broad (Waveney district), Hoveton and Horning (North Norfolk district), and Thorpe St Andrew and Wroxham (Broadland district).*
 - B. *The emerging development boundary in Oulton Broad/Lowestoft in the Waveney Local Plan² comes up to the border of the Broads Authority Executive Area, whilst the development boundary proposed in the Broads*

² The draft interactive policy maps are here:
<http://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=fa885f1dc80d4bbc8ada7bcd13a43471>

Local Plan starts from the Authority's border. The boundaries are therefore conterminous. Some of the Oulton Broad/Lowestoft land in the Broads Executive area is not suitable for inclusion within the development boundary, for example gardens, car parks and open space. There is no conflicting use proposed either side of the Authority's border, and the approach is coherent between Waveney District Council and the Broads Authority.

- C. The adopted development boundaries for Hoveton³ and Horning⁴ in the North Norfolk Core Strategy/Development Management/Site Allocations document each come up to the border of the Broads, whilst the development boundary in the Broads Local Plan starts at the border. The boundaries are therefore conterminous. The Broads development boundary excludes car parks and gardens. There is no conflicting use proposed either side of the Authority's border, and the approach is coherent between North Norfolk District Council and the Broads Authority.*
- D. The adopted development boundaries for both Thorpe St Andrew and Wroxham in the Broadland Site Allocations DPD come up to the Border of the Broads Authority Area⁵. The development boundary in the Broads starts from the border with Broadland and excludes gardens, car parking areas and open space. The boundaries are therefore conterminous. There is no conflicting use proposed either side of the Authority's border, and the approach is coherent between Broadland District Council and the Broads Authority. Please note however that as set out in document LP-SUB2 (Proposed Change 66) and in response to Thorpe St Andrew Town Council's representation (LP-PUB4 page 67) it is proposed that the development boundary in the Broads is removed.*

iv. Are the development boundaries for Horning, Oulton Broad, Thorpe St. Andrew and Wroxham and Hoveton appropriately drawn and robust?

- A. Yes. Generally they have been rolled forward from the Sites Specifics Local Plan 2014 with some amendments. They are consistent with the development boundary for the rest of the settlement (i.e. within the District Council area) as discussed previously.*

³ The adopted policies maps for Hoveton is here: [https://www.north-norfolk.gov.uk/media/1338/05b - hoveton_village_centre.pdf](https://www.north-norfolk.gov.uk/media/1338/05b_-_hoveton_village_centre.pdf)

⁴ The adopted policies map for Horning is here: [https://www.north-norfolk.gov.uk/media/1325/24 - horning.pdf](https://www.north-norfolk.gov.uk/media/1325/24_-_horning.pdf)

⁵ The adopted policies map for Wroxham and Thorpe St Andrew is here: https://www.broadland.gov.uk/downloads/file/1309/site_allocations_dpd_policies_maps_horsford_to_wroxham

B. Please note however that as set out in document LP-SUB2 (Proposed Change 66) and in response to Thorpe St Andrew Town Council's representation (LP-PUB4 page 67) it is proposed that the development boundary originally proposed for the Broads part of Thorpe St Andrew is removed.

v. Does Policy PUBDM34 provide an effective framework for determining residential schemes in settlements with development boundaries?

A. Yes. The development boundaries are robust and consistent with the rest of the settlements as discussed in the previous two questions. Other policies in the Local Plan may apply, depending on the site specific details of the scheme proposal and the precise location of the site.

e) Is the general employment strategy in Policy PUBSP10 justified and robust? Should the Plan identify a jobs growth and/or employment land target? Are there any existing sources of evidence on jobs growth that could be used to derive targets⁶?

i. Policy PUBSP10 is justified as a general employment strategy for the specific Broads area. The policy seeks appropriate growth and change to support the local economy and prosperity of the community whilst ensuring the special characteristics of the Broads (which are often the basis for businesses, especially tourism) are respected. Considering the Broads is a nationally protected landscape given the highest status of protection, this approach is reasonable and justified. As set out in EB10 Employment and Economy Topic Paper, which provides evidence towards the economy section of the Local Plan, BeWilderwood and Barnes Brinkcraft (who are two of the larger local businesses) state that they understand the reasons for the policies seeking to protect the special characteristics of the Broads.

ii. The Plan does not identify an employment land target because it is expected that employment growth will arise as a result of discrete and low scale developments, and also some new jobs will not require new land/space. For example office employment densities have increased significantly and appear to continue to do so as employers cut costs and offer more flexible working. Also, in rural areas, many local jobs will be based at or from home (hairdressers or tree surgeons for example).

⁶ Noting that jobs growth forecasts from the East of England Forecasting Model (EEFM) have been used on a proportional basis to derive jobs-led dwelling forecasts for the Broads area, as set out in Appendix 3 in the Central Norfolk Strategic Housing Market Assessment (2017).

- iii. *In order to derive some quantitative job-related data for the Broads Local Plan, the jobs figures for the constituent District Council's areas, as based on the EEFM, have been extracted below. To come up with a share for the Broads, a proportion of each district figure has been worked out as a pro-rata of the proportion of that district's total housing need identified for the Broads. Note that the source for housing and jobs numbers in Norfolk was LP-SUB10 (page 44 and 28) and for Waveney was their emerging Local Plan⁷.*

| | District total housing need to 2036 | Broads total housing need to 2036 | Broads as % of district's need |
|----------------|-------------------------------------|-----------------------------------|--------------------------------|
| Broadland | 8160 | 50 | 0.61 |
| Great Yarmouth | 8820 | 66 | 0.75 |
| North Norfolk | 8511 | 70 | 0.82 |
| Norwich | 15201 | 3 | 0.02 |
| South Norfolk | 16032 | 40 | 0.25 |
| Waveney | 8223 | 57 | 0.69 |

| | Total district increase in jobs by 2036 | Broads as % of district's need | Potential Broads Jobs number |
|----------------|---|--------------------------------|------------------------------|
| Broadland | 5,000 | 0.61 | 30.64 |
| Great Yarmouth | 5,700 | 0.75 | 42.65 |
| North Norfolk | 2,500 | 0.82 | 20.56 |
| Norwich | 18,000 | 0.02 | 3.55 |
| South Norfolk | 11,300 | 0.25 | 28.19 |
| Waveney | 5000 | 0.69 | 34.50 |
| TOTAL | | | 160.10 |

- iv. *Based on the above methodology, the increase in jobs required in the Broads from 2015 to 2036 is estimated as 160 jobs in total, or 7.6 new jobs per year. It is noted that the scale of employment growth is modest and concerns a low number of jobs and therefore has uncertainties relating to the methodology for forecasting as well as statistical uncertainty. Trying to measure and monitor such a small number accurately and to attribute it to a planning strategy would be difficult as there are so many variables which could affect such a small number. It is not proposed therefore to allocate quantified jobs or employment land targets in the Local Plan.*

⁷ [http://consult.waveney.gov.uk/gf2.ti/f/911330/35229029.1/PDF/-/Waveney Local Plan Final Draft.pdf](http://consult.waveney.gov.uk/gf2.ti/f/911330/35229029.1/PDF/-/Waveney%20Local%20Plan%20Final%20Draft.pdf) page 25.

- v. *As stated in the response to EPS1 (question 9, page 5 onwards), none of our districts' employment studies set a jobs need for the Local Plan for the Broads and no comments or objections to the approach of the Local Plan were received from our districts.*
 - vi. *The Local Plan for the Broads includes criteria based policies to enable applications for economic related development to be assessed (as set out in Section 22, page 79 of the Local Plan). Further, the allocations at PUBNOR1 and PUBOUL2 are for mixed use developments so employment opportunities could come forward on those sites.*
- f) Are 'employment uses' clearly defined in Policy PUBSP10 and consistently applied in the Plan? What is the justification for including A1 uses (retail)?
- i. *The 'employment uses' mentioned in PUBSP10 are defined in the reasoned justification. This policy refers to specific land use classes 'B1, B2, B8 and A1 and uses which are deemed ancillary to these uses'. This is repeated in the reasoned justification to PUBDM24 and PUBDM25. PUBDM26 is about diversification and is not prescriptive about the land use which a business or farm changes to, covering this by criteria in the policy guiding what is acceptable. PUBDM27 relates to buildings to support the operational use of the site with criteria to guide what is acceptable and cross referring back to other policies in the employment section that could be of relevance. Some site allocation policies that relate to employment uses will need to address the requirements of the relevant policies in the economy section and they cross refer to that section where required.*
 - ii. *A1 is included in this section because typically on waterside sites there may be a shop or other retail unit associated with it and this will often support the primary use. For example Waveney River Centre provides for tourism and recreation uses and has a shop on site selling day to day essentials to provide for the needs of those at the site. Another example is Brundall Gardens Marina which has a retail warehouse on site displaying and selling boats and boating goods. A1 uses provide job opportunities. The policy does not envisage general retail use, rather retail to support the primary use.*
- g) What is the Authority's spatial strategy for economic growth? How will the Plan help to improve the alignment between the locations of workplaces and homes, in line with objectives in the Norfolk Spatial Framework?
- i. *The strategy for economic growth is set out in the strategic policies of PUBSP10 and PUBSP11. These policies support suitable and appropriate economic growth and changes to existing employment sites that respect the special characteristics of the nationally important area. It seeks to*

protect existing sites from inappropriate change which would undermine the Broads economy, but allows suitable and appropriate diversification. This is a proportionate approach to a Local Plan that covers an extremely constrained but nationally important area.

- ii. Much of the economy of the Broads is tourism and water based. So the location of a business is influenced by the particular tourist attraction it relates to which is often the water. On other occasions, the location of the business relates to historic reasons, for example the Cantley Sugar Beat Factory. The location of such businesses is not always suitable for homes because of flood risk constraints mainly, but also amenity impacts on the community. The policies do not seek to encourage either housing growth or economic development in rural areas, and this approach prevents misalignment between locations of workplaces and homes.*
- iii. There are limited suitable sites for new homes and indeed employment land in the Broads Authority Executive Area. The Broads area is very small and the residents live at similar distances from work opportunities as any other rural residents in the districts. There are many constraints that include flood risk, designated sites and settlements with few services and facilities. In many instances, the part of a parish that is in the Broads is the more rural part, and landscape impacts of new development constrain development potential. As such, it is often better to develop in the more built up and less constrained part of a particular parish which is usually outside of the Broads. The immediately adjacent settlements may offer a range of vacant employment land from the strategic opportunities in the main urban areas (e.g. 140ha of allocated employment land on the NDR between Postwick and the airport) and at Coltishall (Scottow); to smaller allocations/permissions at places like Acle, Loddon and Stalham.*
- iv. Given the special characteristics of the area, it is not deemed appropriate to systematically align homes with the types of jobs that tend to be located in the Broads. That being said, two of the sites allocated for housing require mixed use development – PUBNOR1 and PUBOUL2. In the case of PUBOUL2 there is permission for 76 houses and an office. For PUBNOR2 the original plan for the site involved residential but also a power station, shops and cafes and research centre as well as student accommodation which would all provide jobs near to homes.*
- v. Early on in the Local Plan process, the Authority considered whether employment should only be acceptable within development boundaries (see LP-IO1, 27.3 page 103). As shown in EB14 'How the Issues considered in the Issues and Options have been taken forward', commentary on this issue is on page 5, Issue 39 and says that 'there would likely be lots of exceptions e.g. boatyards and tourism*

development. The areas where the development boundaries chosen are not necessarily appropriate for employment’.

- h) What is the Authority’s strategy for retail growth? Is there an identified hierarchy of centres? Have retail needs been assessed for the Broads area?
- i. There are only two significant areas of retail in the Broads. These are part of Hoveton Town Centre in North Norfolk and part of Oulton Broad District Centre in Waveney District.*
 - ii. Hoveton Town Centre (taken as a whole) is assessed in EB22 North Norfolk Retail and Main Town Centre Uses Study (2017) and is the subject of its own policy produced in liaison with North Norfolk District Council (PUBHOV5). There is a consistent approach to the town centre even though it lies within two Local Planning Authority areas.*
 - iii. Oulton Broad District Centre (taken as a whole) is assessed in EB39A and EB39B Waveney District Council Retail and Leisure Needs Assessment (2016) and Appendices and is subject of its own policy produced in liaison with Waveney District Council (PUBOUL3). Similar to the previous point, there is a consistent approach for Oulton Broad District Centre.*
 - iv. There are other smaller, albeit locally important, areas of retail in the Broads: Horning village centre and the area around Potter Heigham Bridge, both within the area of North Norfolk District Council. EB22 does not assess these small retail areas.*
 - v. In acknowledgement of the importance to the community and visitors alike, there is a policy that covers Potter Heigham Bridge area (PUBPOT1), with explicit mention of the retail outlet.*
- i) Will the sequential test and impact assessment outlined in Policy PUBHOV5 be applied across the authority area? Is the proposed impact assessment threshold of 500 m2 for Hoveton town centre justified and applicable in all parts of the Broads?
- i. The sequential test applies for schemes that are proposed in Hoveton and Wroxham outside of Hoveton town centre. This is in line with NPPF Paragraph 24 (town centres, edge of town centres, then out of centres). It is not intended to apply to the entire Broads. For example, as set out at Matter 12 regarding Oulton Broad District Centre, there is a proposed change to relate to an impact assessment threshold of 350 sq.m that applies to the entire district of Waveney.*
 - ii. The justification for the impact assessment threshold of 500m2 is set out in EB22 at paragraph 6.22, page 64 but copied here: 'Retail development of 2,500 sq.m gross would be significant in relation to the scale of existing retail provision in Hoveton/Wroxham and is more than double the total*

floorspace projection over the plan period. A locally set threshold of 500 sq.m gross would be appropriate for retail and leisure development in Hoveton/Wroxham reflecting the existing scale of the town centre and the floorspace projections shown in Table 6.6'.

- iii. This threshold is only relevant to proposals located in Hoveton and Wroxham (whether in North Norfolk/Broadland or the Broads). It would not be applicable in other parts of the Broads.*
 - iv. For schemes above 500 sq.m, applicants will be expected to establish a catchment area as part of the impact assessment to test the impact of a proposal.*
- j) Are there any conflicts or duplication between the draft Broads Local Plan and adopted/emerging Neighbourhood Plans in the Broads Area?
- i. An assessment of the Local Plan against adopted Neighbourhood Plans has been carried out to ensure that there is no conflict. Please see EB20 Assessment of Local Plan against Neighbourhood Plans.*
 - ii. Turning to emerging plans, there are no firm proposals emerging in Neighbourhood Plans at the later stage of their production that the Authority considers conflict with or duplicate the policies of the Local Plan.*
- k) Is the Plan's general approach to new housing, employment and tourism development, as set out in strategic and development management policies, consistent with paragraph 116 in the National Planning Policy Framework (NPPF)?
- i. As responded earlier in b) ii), the Plan's vision is underpinned by a list of special qualities set out at paragraph 8.4, page 24 of the Local Plan, which characterise the special status of the Broads. These special qualities are referred to consistently throughout the sections related to new housing, employment and tourism development.*
 - ii. There are policies that relate to major development. PUBOUL2 is for 76 dwellings, PUBNOR2 is for around 120 dwellings and PUBTHU1 is for 16 dwellings. All of these sites have been assessed in coherence with paragraph 116 in the NPPF. As brownfield sites, their regeneration is considered to result in betterment to the local community, economy and landscape/townscape.*
 - iii. PUBSSA47 relates to the dualling of the Acle Straight and sets out the criteria any scheme needs to consider and address, especially at the feasibility and design stages. It is important to note that the A47 policy neither promotes nor seeks to prevent the scheme coming forward. The*

approach is coherent with paragraph 116 in the NPPF, for example the reasoned justification indicates that changes to the Acle Straight will need to be thoroughly justified and be designed to reduce and avoid adverse impacts.