

Broads Local Plan

Issues and Options Consultation

Plan period to: 2012 to 2036

Consultation period: 15 February – 4pm 8 April 2016

The National Planning Policy Framework states that every local planning authority in England should have a clear, up-to-date Local Plan that conforms to the Framework, meets local development needs and reflects local people's views of how they wish their community to develop.

The Issues and Options version of the Broads Local Plan includes early thoughts on what the Broads Local Plan will contain.

We welcome your views.

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1. Introduction

1.1. About the local plan

Local planning authorities must prepare a Local Plan which sets planning policies in a local planning authority area. These are very important when deciding planning applications as all decisions must be made in accordance with the policies unless there are strong reasons not to. Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF).

The NPPF 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.

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.

This stage of the process discusses key issues in the Broads and suggests some broad options to address these issues organised around environment, economic and societal themes. There is no policy content proposed as this is for the next stage – the Preferred Options stage of the Local Plan.

It is important to note that other issues may be addressed in the next stage of the Local Plan that are not covered in the Issues and Options. These may arise out of consultation responses for example. At the Preferred Options Stage it will also become clearer which of our existing adopted policies we intend to roll forward, if any will be changed or merged as well as policies we intend to delete.

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.

1.2. Interim Sustainability Appraisal

Accompanying the Issues and Options document is an interim Sustainability Appraisal which is also being consulted on.

The Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) be undertaken for plans such as Local Plans. 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. The Broads Local Plan SA will examine whether the effects of the specific sites/areas allocations and policies therein individually or collectively, give rise to sustainability benefits or dis-benefits. The task of this sustainability appraisal is firstly to assess the short, medium and long-term social, environmental and economic effects of the individual policy options and assess the combined effects, in these terms, of the policies for the whole area.

The Scoping Report for the Sustainability Appraisal was consulted on during the period 13 October to 14 November 2014. We consulted the statutory environmental bodies and other selected organisations. The Scoping Report formed the starting point for a process of sustainability appraisal. In general, the Broads Authority's proposed approach to the Sustainability Appraisal was well received.

1.3. Habitats Regulation Assessment

Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora, and the UK regulations that give effect to this, require an 'Appropriate Assessment' (AA) or Habitats Regulations Assessment (HRA) of the potential impacts of land-use plans (this includes the Broads' Local Plan) on European designated habitat sites to ascertain whether they would adversely affect the integrity of such sites. Where significant adverse effects are identified, alternative options must be examined to avoid any potential damaging effects.

While any effect of the policies of the Local Plan on European designated habitats is obviously a component of the SA/SEA (Strategic Environmental Assessment) of the document, the specific requirements and process of an 'appropriate assessment' differ, and so the Appropriate Assessment/Habitats Regulations Assessment will be carried out on subsequent versions of the Local Plan.

Of importance to the HRA of the Broads Local Plan is work currently being undertaken to understand the behaviour of visitors to various protected sites in Norfolk. All the Local Planning Authorities have jointly commissioned this piece of work that involves interviewing visitors to sites to ascertain where they have visited from, what they will be doing as part of their visit and what route they will take. This work will be completed in the Spring of 2016.

1.4. Local Plan Production process

The following table shows the proposed Broads Local Plan Process. We have also produced a Local Development Scheme (timeline) that shows when the various stages of the Broads Local Plan process are predicted to take place. The Local Development Scheme (LDS) can be found at [Appendix B](#). This consultation stage is the Issues and Options and is highlighted on the table over page.

Table 1: Broads Local Plan Process

Sustainability Appraisal and Habitats Regulation Assessment	1: Identify issues	Review existing policies and identify current gaps in policies.
	2: Collect evidence	Research that will inform 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. (Regulation 18)
	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. Regulation 22. 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. (Regulation 24)
	10: Adopt	If the independent Planning Inspector finds the Local Plan sound, the Plan can be adopted by the Authority. (Regulations 25 and 26). If the Inspector does not find the Local Plan sound, the process goes back to stage 6.

1.4 Overview of Document

Chapter 1 and 2 give a background to this document as well as tells you how to respond.

Chapters 3, 4, 5, 6, 7 give background information on the Broads and the production of this document.

Chapters 8 to 18 address environmental issues.

Chapters 19 to 23 relate to economic issues.

Chapters 24 to 30 cover issues relating to the society of the Broads.

Chapter 31 relates to developer contributions and obligations

Chapter 32 discusses some potential sites in the Broads that could be addressed in the Issues and Options.

Throughout the document there are some questions to answer and some issues to give your thoughts on.

2. About this consultation

We hope you tell us what you think!

This is a very early stage of the Local Plan production process. This consultation offers a real opportunity for you to influence the Local Plan.

There are specific questions within this document, but there are also issue tables. These summarise the issue and discuss potential options to address the issue. The options do not necessarily need to be mutually exclusive – that is to say that more than one option could be an appropriate and suitable way forward. We welcome your thoughts on the issues and options as well as the individual questions.

All **consultation documents** are available at <http://www.broads-authority.gov.uk/broadsconsultations>.

We are also holding **roadshows** at some venues around the Broads, where you can come and talk to Officers. Details were being finalised at the time of writing, but you can find details by going to the above webpage.

There **are printed copies** of this document and the Sustainability Appraisal at these locations. For opening times, please contact the venue or check on their website:

- Broads Authority, Yare House, 62-64 Thorpe Road, Norwich NR1 1RY
- Broadland District Council, 1 Yarmouth Road, Norwich NR7 ODU
- Great Yarmouth Borough Council, Town Hall, Hall Plain, Great Yarmouth, Norfolk NR30 2QF
- North Norfolk District Council, Holt Road, Cromer NR27 9EN
- Norwich City Council, City Hall, St Peter's St, Norwich NR2 1NH
- South Norfolk Council, Swan Lane, Long Stratton NR15 2XE
- Waveney District Council, Riverside, 4 Canning Road, Lowestoft NR33 0EQ
- Norfolk County Council, County Hall, Martineau Lane, Norwich NR1 2DH
- Suffolk County Council, Endeavour House, 8 Russell Road, Ipswich IP1 2BX
- Whitlingham Broads Visitor Centre, Whitlingham Lane, Trowse, Norwich NR14 8TR
- Toad Hole Cottage Museum, How Hill, Ludham NR29 5PG (Mar-Apr)
- Hoveton Visitor Centre, Station Road, Hoveton NR12 8UR (Mar-Apr)
- Acle Library, Bridewell Lane, Acle NR13 3RA
- Beccles Library, Blyburgate, Beccles NR34 9TB
- Brundall Library, 90 The Street, Brundall NR13 5LH
- Bungay Library, Wharton Street, Bungay NR35 1EL
- Cromer Library, Prince of Wales Road, Cromer NR27 9HS
- Great Yarmouth Library, Tolhouse Street, Great Yarmouth NR30 2SH
- Loddon Library, 31 Church Plain, Loddon NR14 6EX
- Lowestoft Library, Clapham Road South, Lowestoft, NR32 1DR
- Oulton Broad, Library Council Offices, 92 Bridge Road, Oulton Broad NR32 3LR
- Norwich Millennium Library, The Forum, Millennium Plain, Norwich NR2 1AW
- Stalham Library, High Street, Stalham NR12 9AN
- Wroxham Library, Norwich Road, Wroxham NR12 8RX

We have produced a **summary leaflet/questionnaire** which contains some of the less-technical issues discussed in the main document. You can access it using the link above, but there is also an online questionnaire: <https://www.surveymonkey.co.uk/r/HHFVCCS>

The consultation ends at 4pm on 8 April 2016.

3. About the Broads – Spatial Portrait

The Broads area is an internationally important wetland and a nationally designated protected landscape of the highest order, part of the family of UK National Parks.

3.1 The Broads Executive Area

The designated Broads Executive Area, which covers parts of Norfolk and Suffolk, is shown in white in Map 1 below. The Broads Executive Area includes parts of Broadland District, South Norfolk District, North Norfolk District, Great Yarmouth Borough, Norwich City and Waveney District. The councils for those areas do not have planning powers in the Broads area, but retain all other local authority powers and responsibilities. Norfolk County Council and Suffolk County Council are each the county planning authority for part of the Broads, with responsibilities including minerals and waste planning.

The Area does not sit in isolation. There are important linkages with neighbouring areas in terms of the community and economy. What goes on outside the Broads affects the area within and vice versa.

Map 1: Showing the Broads Executive Area



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3.2 The Broads Authority

The Broads Authority is a Special Statutory Authority established under the Norfolk and Suffolk Broads Act 1988. It has a statutory duty to manage the Broads for three specific purposes, none of which takes precedence:

- *Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;*
- *Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and*
- *Protecting the interests of navigation.*

Additionally, in discharging its functions, the Broads Authority must have regard to

- *The national importance of the Broads as an area of natural beauty and one which affords opportunities for open-air recreation;*
- *The desirability of protecting the natural resources of the Broads from damage; and*
- *The needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads.*

The Broads Authority is the local planning authority for the Broads. It is responsible for producing the new Broads Local Plan that guides development in the area and is used in determining planning applications. A primary aspect of the Broads is that it is a nationally designated area, protected and enhanced for the benefit of the nation as well as for the local population and businesses. This is the justification for control of local planning within the designated area to be entrusted to a special purpose body that includes representation of the national interest as well as of local councils and navigators.

3.3 The landscape of the Broads



The Broads is a low-lying wetland mosaic of flooded former peat workings ('broads') of various sizes, river channels, reed swamp, fen, carr woodland and drained grazing marsh, with some arable cultivation but also includes a small stretch of undeveloped coastline near to Horsey and Winterton.

Traditional settlements are on slightly higher ground, with extensive areas of reedbeds, grazing marsh and some carr in and on the edges of the floodplain. There is no particular building vernacular, but the traditional villages tend to have a variety of surviving older buildings of considerable quality or interest, usually clustered near a staithe, either on a river or connected to it by dyke (canal), and surrounded by more modern housing of no particular distinction.

On the riverside, both around such staithes and around the few other road accesses to the waterside, is often a string of chalets and sometimes grander houses. These display a distinctive palette of a progression of early 20th century architectural styles, including versions of Arts and Crafts, Cottage ornée and mock

Tudor particular to the area. There will also usually be boatyards, with buildings of a more utilitarian and industrial character, together with boat mooring basins cut into the marshes, both visually enlivened by boats and their to-ing and fro-ing. These centres of population can be crowded and busy in summer, but population elsewhere in the Broads is sparse.

Sporadic drainage mills and isolated farmhouses sparingly punctuate views across the marshland, and the relative absence of fences (because dykes and drains divide the marshes and contain grazing cattle) accentuates its open, flat and empty appearance. Boats, birds, cattle, field gates, willow pollards and reed-fringed ditches are also important landscape features across the area.

It is a landscape of contrast and surprise, with rivers and broads often concealed from immediate view by carr woodland, or extensive views across marshes to distant woodland and settlements, with the presence of an intervening river often only revealed by the procession of a boat's sail in the middle ground. With its limited road and rail system much of the Broads feels surprisingly remote and isolated, although footpaths cross the area and boat access is extensive.

3.4 The Economy of the Broads



Tourism is the mainstay of the Broads economy. The Broads and surrounding area (including the area of influence) received around 7.7 million visitors in 2014. The tourist economy of the area was estimated at £594 million in 2014, and directly supported more than 7,660 FTE jobs¹. Land and water based tourism is important in the area with around 12,325 boats on the Broads (in 2014, 10,818 private craft and 1,507 hire craft) and many people also enjoy birdwatching, walking, angling, heritage and just being near the water for example.

Boatyards and other waterside businesses are both critical to the enjoyment of the special qualities of the area by tourists and local residents alike. They are also important to the economy of the area and to local employment in their own right. Although many visitors come to the Broads for the day, provision of holiday accommodation is very important, as is the variety of types and locations of such accommodation.

The local economy is, however, not entirely tourism related. Agriculture is the predominant business use in terms of area, though not in terms of numbers employed or monetary value, and has a critical role in maintaining the landscape and its scenic and environmental value. Boat building is a locally important traditional industry.

¹ STEAM Report: Volume and Value of Tourism in the Broads 2013/14

A range of other businesses are located in the Broads. These tend to be small scale and service related, with a notable exception being the large sugar beet processing plant at Cantley.

3.5 The Biodiversity of the Broads



The Broads is one of Europe's most important wetlands for biodiversity and nature conservation. Essentially a freshwater ecosystem made up of meandering rivers interconnecting beautiful expanses of shallow water known as 'The Broads'. The surrounding habitats include botanically rich fens, home to the rare swallowtail butterfly, Norfolk Hawker dragonfly and the bittern. The invertebrate and bird rich wet woodlands, grazing marshes with their network of unique aquatic plant and animal ditch communities, make the Broads one of the most wildlife rich areas in the family of national parks.

This great importance for biodiversity is reflected in the Broads records indicating:

- 11,067 species in total.
- 19% of total protected species in the United Kingdom, and 26% of the UK's Biodiversity Action Plan species, occurring in an area only 0.4% of the United Kingdom.
- 1,519 priority species, and particularly large numbers of priority bird species – 85% of Red, and 94% of Amber, designated UK Bird species.
- Nineteen Global Red Data Book species.
- A very wide range within taxonomic groups: e.g. 403 species of beetle, 251 species of fly and 179 species of moth.
- 66 Broads Speciality species: 14 species entirely, and 17 largely, restricted to the Broads in the UK, and 35 with its primary stronghold in the area.

3.6 Heritage and Culture of the Broads



The unique quality and distinctiveness of the built environment of the area, its drainage mills, river and waterside settlements and the Broads origins as human made medieval peat diggings makes the Broads

itself arguably one of England's most extensive industrial monuments. Collectively these features provide the context for individual sites of built and archaeological interest resulting in a true cultural landscape.

The Broads Executive Area contains over 270 Nationally Listed Buildings, 15 Scheduled Monuments and 25 Conservation Areas. The area has been identified by Historic England as being a site of exceptional potential for waterlogged archaeology and the Broads Authority has developed a Local List of heritage assets which is updated regularly. The Broads is also home to numerous heritage craft including the famous trading wherries, other historic sailing and motor vessels.

The Cultural assets of the Broads are a fragile, precious and finite resource and whilst the cultural value of the area can be added to by outstanding new design, its past is documented by the historic environment. It is important therefore that policies are in place to protect, enhance and better understand the historic environment and cultural landscape of the Broads.

3.7 Navigating the Broads



One of the Broads Authority's statutory purposes is to protect the interests of navigation. The Broads is one of the most extensive and varied inland waterway systems in the UK, offering 200km of boating on lock-free tidal rivers. The navigation reaches from the quiet headwaters of the Bure, Ant, Thurne and Waveney to the bustling centre of Norwich and coastal resorts of Great Yarmouth and Lowestoft.

The Broads Authority Executive Area comprises approximately 1,974ha of water space and 63 open water bodies, covering 841ha. Many of these water bodies are 'broads' in the traditional sense, having been formed from medieval peat diggings and used as water transport routes linking settlements with the main rivers and tributaries, while others are of more recent and/or different origin, such as at Whitlingham Country Park, developed on the site of a gravel quarry. Some broads have public navigation rights, others have more limited access, generally for environmental or land ownership reasons, while some others are landlocked and inaccessible to craft.

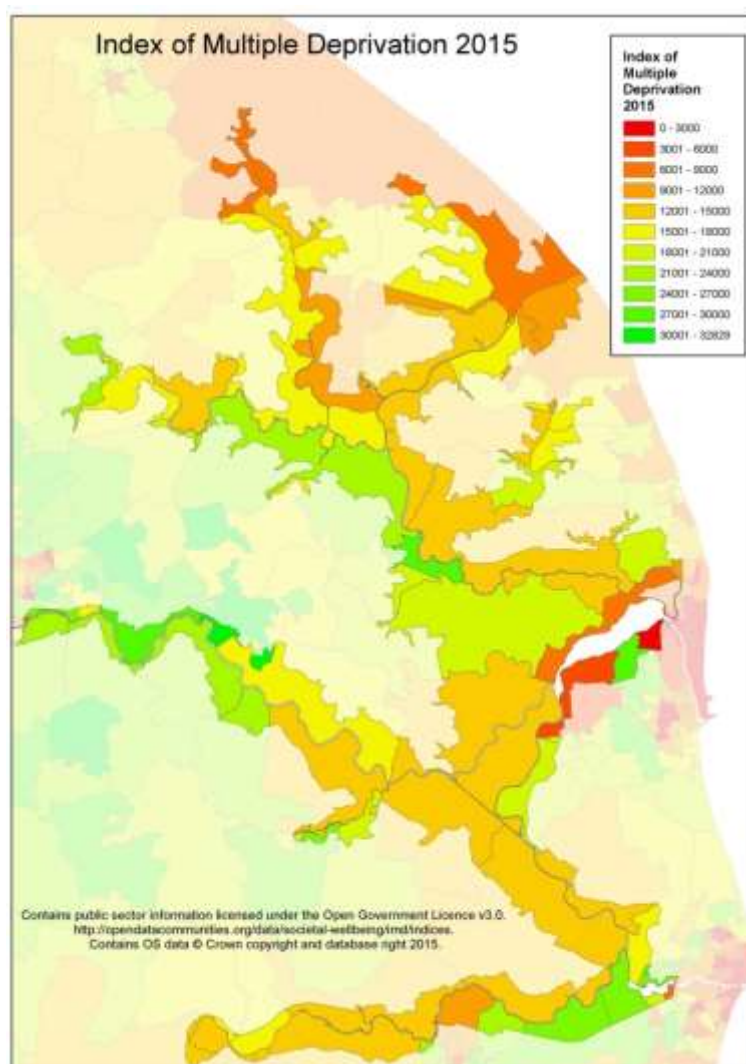
As a harbour and navigation authority, the Authority is responsible for the maintenance of the navigation on the waterways, which is entirely funded through income generated by boat tolls. Its duties include health and safety provisions, dredging, management of vegetation, clearance of wrecks and other hazards, signing and marking the waterways, maintaining the network of free 24-hour moorings and providing a ranger service to assist the public and enforce the byelaws, particularly speed limits.

3.8 The Community of the Broads

The resident population of the Executive Area is about 6,000 people. Living in the Broads, particularly close to the water, is highly prized, and this is reflected in local house prices. Local communities strongly identify with the area and value its special qualities.

The Census 2011 gives some facts and figures about the community of the Broads:

6,271 people live in the Broads. **49.8%** are male and **50.2%** are female. The mean age of the population is **49.3**. The **majority** work full time or are retired. **Most** identify their health as good or very good. **9.6%** residents reported having a long-term health problem or disability which limited their day to day 'a lot'. The Broads has a population density of **0.2 people per hectare**. The number of households increased by **307** between 2001 and 2011.



Furthermore, the recent Indices of Multiple Deprivation (2015) give an interesting insight into the community of the Broads. The Indices of Multiple Deprivation map for the Broads is shown above. The map uses a traffic light system whereby red indicates most deprived and green least deprived. More detailed maps are shown at [Appendix A](#).

3.9 Access and Recreation



The Broads is one of the most extensive inland waterways in the UK, with over 200km of lock free navigable rivers and open water bodies. Boating is a major recreational activity, with over 12,000 licensed craft using the navigation area, from rowing boats and canoes to sailing boats, motor cruisers and commercial

passenger vessels. The Broads navigation reaches from the quiet headwaters of the Bure, Ant, Thurne and Waveney to the bustling centre of Norwich and coastal resorts of Great Yarmouth and Lowestoft.

Due to the nature of its wetland landscape, many parts of the Broads are most easily accessible by water, with the unique experience this brings. However, the Broads is not just about water, and there are many recreational opportunities to be enjoyed on land. The area has an extensive rights of way network, with 303km of public footpaths and 17km of public bridleways available for public use. There are three promoted long distance routes and a number of circular walks and cycle routes in the area. Additionally, approximately 150ha of land in the Broads has been designated as open access land under the Countryside and Rights of Way Act 2000. The Broads is also one of the most popular areas in the UK for angling.

The Broads is the UK's premier wetland and a member of the UK family of National Parks, Internationally recognised for its landscape, nature conservation and cultural features the Broads is a popular recreational destination, with miles of open water space and a rich variety of natural, historic and cultural assets to be explored and enjoyed.

3.10 Pressure on the Broads

The Broads is a fragile wetland, and has come under increasing pressure from a variety of sources, including development both internal and external to the Broads Executive Area. In the last century, habitat loss and fragmentation, nutrient enrichment and pollution of waterways, and increasing threats from non-native species and rising sea levels associated with climate change, have seen a decline in species and habitats. The Broads Plan and the Broads Biodiversity Action Plan commit the Authority and its partners to halting and reversing this decline in species and habitats in the Broads. Sea level rise will also increase pressure on the Broads over time.

Stop the spread of Killer Shrimp

Check boats and fishing kit coming into and leaving the broad. Particularly in areas that are damp or hard to inspect.

Clean and wash off all equipment (e.g. nets, spray decks and footwear) and boats (including canoes) to make sure you are not taking any organism to other rivers. Remove and destroy any shrimp found.

Dry all equipment, clothing and pump out bilges - shrimp can live in damp conditions for many days. If drying is impossible, at least wash down equipment before coming into and leaving the broad for other river systems.



Killer Shrimp

Dikerogammarus villosus



4. Policy Context

4.1 Introduction

The following documents are relevant key policy documents that have helped shape the production of the Issues and Options and will inform the Local Plan as it progresses through later stages.

4.2 National Planning Policy Framework (NPPF) (2012)²

The National Planning Policy Framework acts as guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications and is a material consideration in decision-making. The Broads is specifically mentioned in relation to landscape and scenic beauty and objectively assessed needs (whether for jobs or housing):

14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- *Local Planning Authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless (inter alia) specific policies in this Framework indicate development should be restricted (For example, those policies relating to sites protected under the Birds and Habitats Directives... (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the **Broads Authority**); designated heritage assets; and locations at risk of flooding or coastal erosion).*

*115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the **Broads** and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the **Broads**.*

4.2 National Planning Policy Guidance (NPPG) (2014)³

On 6 March 2014 the Department for Communities and Local Government (DCLG) launched this planning practice guidance web-based resource. This web-based resource was developed following the recommendations of the External Review of Planning Practice Guidance led by Lord Taylor of Goss Moor. This guidance is intended to assist practitioners. Ultimately the interpretation of legislation is for the Courts but this guidance is an indication of the Secretary of State's views. Planning practice guidance will be updated by DCLG as needed. The guidance covers the following topics (as at September 2015).

Advertisements	Flood Risk and Coastal Change	Open space, sports and recreation
Air quality	Hazardous Substances	facilities, public rights of way and
Appeals	Health and wellbeing	local green space
Before submitting an application	Housing and economic	Planning obligations

² <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³ <http://planningguidance.planningportal.gov.uk/>

Climate change Community Infrastructure Levy Conserving and enhancing the historic environment Consultation and pre-decision matters Crown Development Design Determining a planning application Duty to cooperate Ensuring effective enforcement Ensuring the vitality of town centres Environmental Impact Assessment Fees for planning applications Flexible options for planning permissions	development needs assessments Housing and economic land availability assessment Housing- Optional Technical Standards Land affected by contamination Land Stability Lawful development certificates Light pollution Local Plans Making an application Minerals Natural Environment Neighbourhood Planning Noise	Renewable and low carbon energy Rural Housing Starter Homes Strategic environmental assessment and sustainability appraisal Transport evidence bases in plan making and decision taking Travel plans, transport assessments and statements in decision-taking Tree Preservation Orders and trees in conservation areas Use of Planning Conditions Viability Waste Water supply, wastewater and water quality When is permission required?
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4.3 UK Marine Policy Statement (2011)⁴

Marine Policy Statement (MPS) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. The Marine and Coastal Access Act 2009 requires all public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area to do so in accordance with the MPS unless relevant considerations indicate otherwise.

4.4 East Inshore and Offshore Marine Plans (2014)⁵

The East Inshore Marine Plan area includes the coastline stretching from Flamborough Head to Felixstowe, extending from mean high water out to 12 nautical miles, including inland areas such as the Broads and other waters subject to tidal influence, and covers an area of 6,000 square kilometres. The East Offshore Marine Plan area covers the marine area from 12 nautical miles out to the maritime borders with the Netherlands, Belgium and France, a total of approximately 49,000 square kilometres of sea.

Vision for East Marine Plan Areas in 2034

By 2034 sustainable, effective and efficient use of the East Inshore and East Offshore Marine Plan Areas has been achieved, leading to economic development while protecting and enhancing the marine and coastal environment, offering local communities new jobs, improved health and well-being. As a result of an integrated approach that respects other sectors and interests, the East marine plan areas are providing a significant contribution, particularly through offshore wind, to the energy generated in the United Kingdom and to targets on climate change.

4.5 National Parks Circular (2010)⁶

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69322/pb3654-marine-policy-statement-110316.pdf

⁵ <https://www.gov.uk/government/publications/east-inshore-and-east-offshore-marine-plans>

⁶ <https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010>

Whilst the National Parks and the Broads are established under two separate Acts of Parliament, the similarities between them are such that this circular has been produced to apply equally to them all. It sets out in relation to the Parks and the Broads:

- a vision for the English National Parks and the Broads for 2030;
- the key outcomes the Government is seeking over the next five years to ensure early progress towards the vision and suggested actions for achieving those outcomes;
- the key statutory duties of the National Park Authorities (NPAs) and the Broads Authority (together 'the Authorities') and how they should be taken forward;
- policy on governance of the Authorities;
- the contributions needed from others.

Vision for the English National Parks and the Broads

By 2030 English National Parks and the Broads will be places where:

- There are thriving, living, working landscapes notable for their natural beauty and cultural heritage. They inspire visitors and local communities to live within environmental limits and to tackle climate change. The wide-range of services they provide (from clean water to sustainable food) are in good condition and valued by society.
- Sustainable development can be seen in action. The communities of the Parks take an active part in decisions about their future. They are known for having been pivotal in the transformation to a low carbon society and sustainable living. Renewable energy, sustainable agriculture, low carbon transport and travel and healthy, prosperous communities have long been the norm.
- Wildlife flourishes and habitats are maintained, restored and expanded and linked effectively to other ecological networks. Woodland cover has increased and all woodlands are sustainably managed, with the right trees in the right places. Landscapes and habitats are managed to create resilience and enable adaptation.
- Everyone can discover the rich variety of England's natural and historic environment, and have the chance to value them as places for escape, adventure, enjoyment, inspiration and reflection, and a source of national pride and identity. They will be recognised as fundamental to our prosperity and well-being.

4.6 The Broads Plan 2011

The Broads Plan is the key strategic management plan for the Broads. It sets out a vision, aims and objectives for the Broads and coordinates and integrates a wide range of strategies, plans and policies relevant to the area with the purposes and duties set out in the Broads Acts.

The current Broads Plan has three key themes, covering a range of topics:

- Planning for the long-term future of the Broads in response to climate change and sea level rise, understanding and responding to the key challenges facing the Broads over the next 50 -100 years presented by climate change and sea level rise.
- Working in partnership on the sustainable management of the Broads' landscape and cultural heritage; agriculture and land management; biodiversity; and management of the navigation area.
- Encouraging the sustainable use and enjoyment of the Broads. Promoting understanding, enjoyment and wellbeing; and tourism, recreation and access.

The Broads Authority is required to review the Broads Plan at least every five years. The next version of the Broads Plan will be updated at the same time as the Broads Local Plan. The process to produce a Management Plan for the Broads takes less time than the Local Plan will take; the Broads Plan will be adopted before the Broads Local Plan. This provides the opportunity to neatly align the Local Plan with the Broads Plan.

4.7 Current Broads Planning Policy Documents⁷

The Core Strategy Development Plan Document (DPD) is key in setting out the vision for the Broads until 2021. It includes environmental, social and economic objectives and primary policies for achieving that vision.

Development Management Policies were adopted in 2011 to provide the main policies that guide the determination of planning applications in the Broads, including development within the flood plain and achieving economic development in a protected landscape. These detailed policies are developed from the strategic principles set out in the Core Strategy.



The Site Specific Policies apply to a particular site or area. Sites are allocated for housing, open space and as important for transport. This document also allocates development boundaries to some settlements. Adopted in 2014, this is the most recent planning policy document of the Broads Authority.

4.8 Saved 1997 Local Plan Policy⁸

One policy is saved from the 1997 Local Plan: TSA2.

Policy TSA 2 Thorpe Island

- a) Development within the existing boatyard at the eastern end of Thorpe Island, which is needed to meet the essential operational requirements of the boatyard, will be permitted.
- b) Other than that specified in a), development will not be permitted on Thorpe Island.

4.9 Neighbouring Local Planning Authorities' Planning Policy Documents

The Broads Authority is the Local Planning Authority for the Broads Executive Area. Parts of the Broads area cover Norwich City, Broadland, South Norfolk, North Norfolk, Great Yarmouth Borough and Waveney District Council areas. These districts are the Local Planning Authorities for the remainder of their areas. The Broads are in both Norfolk and Suffolk and the County Councils have produced minerals and waste planning policy documents.

⁷ <http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents>

⁸ http://www.broads-authority.gov.uk/_data/assets/word_doc/0008/496745/1997-Broads-Local-Plan.doc

It is important as the Broads Local Plan is produced to be aware of the proposals and policies of the districts and counties. Please see the literature review of the Sustainability Appraisal for more information on these documents.

4.10 Norfolk Strategic Framework (NSF)

Norfolk Local Planning Authorities are working towards a Norfolk Strategic Framework (NSF) to ensure that planning is undertaken strategically and the requirements of the Duty to Cooperate are met (see following section for more details). All Local Planning Authorities in Norfolk are working together to produce this work over the next 18 months or so. This Framework will identify cross boundary and strategic issues and seek ways to recommend to the Authorities on how to address these issues in a coordinated manner. Not a policy document, but a framework, the NSF follows the approach taken by Cambridgeshire Local Planning Authorities which has been successful to date. At the time of writing, its preparation was at early stages, but will be nearing completion at the time of the Preferred Options stage of the Broads Local Plan.

4.11 Neighbourhood Plans

At the time of writing, the following Neighbourhood Plans were adopted or in preparation (as at September 2015):

Neighbourhood Plan	Status
Acle	Adopted 2015
Beccles Area	Preparation
Brundall	Referendum early 2016
Oulton	Preparation
Salhouse	Preparation
Strumpshaw	Adopted 2014

5. Duty to Cooperate

The Duty to Cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.

The Duty to Cooperate is not a duty to agree, however, local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

Local planning authorities must demonstrate how they have complied with the Duty at the independent examination of their Local Plans. If a local planning authority cannot demonstrate that it has complied with the Duty then the Local Plan will not be able to proceed further in examination.

The Localism Act states that relevant bodies must ‘...engage constructively, actively and on an ongoing basis...’. The Broads Authority meets this Duty in the following ways (please note this list is not exhaustive but gives a flavour of the activity):

- Production of the Norfolk Strategic Framework. See previous section for more details.
- Regular attendance (Chair of Planning Committee) at the quarterly Norfolk Duty to Cooperate Member Group meetings.
- Commission joint evidence base, for example the Norfolk Recreational Impact Study and the Great Yarmouth and Waveney Settlement Fringe Landscape Impact Study and the Central Norfolk Strategic Housing Market Assessment.
- Regular officer level meetings. Namely the Norfolk Strategic Planning Officers Group (attended by the Environment Agency), the Suffolk Planning Officers Group and the Greater Norwich Strategic Planning Officers Group.
- Quarterly meetings with Great Yarmouth Borough Council and Waveney District Council.
- Attending the Wider South East summit (Chair of Broads Authority) run by the Greater London Authority.
- A member from each of the Authority’s constituent districts sits on the Broads Authority Planning Committee. The Waveney representative sits on the Waveney Local Plan steering group.
- Individual meetings with Planning Policy Teams of the Authority’s constituent districts.

The Authority therefore considers that it engages constructively and on an ongoing basis with relevant authorities. As the Local Plan progresses through the next stages of production, draft statements covering how the Authority has met the requirements of the Duty to Cooperate will be produced.

Q: Do you have any thoughts on the Authority’s approach to Duty to Cooperate?

6. Challenges and Opportunities

This section identifies some of the principal sustainability challenges and opportunities in the area that are potentially relevant to the Broads Local Plan.

Strengths

- Extensive, diverse and very highly valued landscape, habitats, flora, fauna and cultural heritage assets.
- A unique wetland and low lying area within the membership of the National Parks family. Formal nature conservation designations of the Broads and many areas within it provide relatively high levels of policy protection or conservation.
- A short undeveloped stretch of coastline.
- High levels of tranquillity through much of the Broads, in particular, a sense of remoteness in some parts of the Broads despite these being located close to concentrations of housing and industry.
- Attractive environment, providing the basis for most of the Broads' economy, and recreation for residents and visitors.
- Britain's largest protected wetland and third largest inland waterway, with the status of a national park
- High level of interaction with the surrounding area, with complementary provision of facilities and opportunities. For example, employment and development opportunities, community facilities, etc. in surrounding districts, towns and city serve also Broads residents; while the Broads provides recreational and business opportunities to those from a wider area.
- Thriving hire boat industry contributing to the local economy.
- Many organisations and individuals caring for or promoting the value of various aspects of the Broads.
- Importance of the Broads for the identity and recreation of a much wider area.
- The age profile of the area shows more older persons than the surrounding area. Older people are often motivated, educated and experienced and play an important role in the community.
- Substantial engaged community of private boat owners.

Weaknesses

- Some of protected habitat and other designations are in less than optimal condition and/or vulnerable to change as a result of, for example, fragmentation, inappropriate land management and pressure from nearby development. Some areas of fen and some lakes are in decline.
- Almost the whole of the Broads area subject to, or at risk of, flooding.
- High levels of listed buildings and other heritage assets at risk, and particular problems in finding compatible and beneficial uses that could help secure the restoration and maintenance of heritage assets such as windpumps/drainage mills.
- Continuing (though declining) problems of water quality in the rivers. Ground water quality problems.
- Difficulty of modernising and adapting existing buildings and uses, and accommodating new ones, due to flood prone nature of the area.
- Decline in traditional industries such as millwrights and reed and sedge cutters.
- High reliance on tourism which can leave the economy vulnerable and could mean a loss of resilience as a result of changes to the holiday/recreational patterns.
- Car dependence of local communities and businesses and fragmentation of settlements.
- Depleted local community and/or visitor facilities, often through displacement by higher value activities (principally housing)

- Tensions and perceptions of incompatibility, between interests of conservation, recreation, tourism, navigation, and local communities, and between local interests and the national value of the Broads.
- The ageing population could lead to imbalance in the community.
- Lack of housing that is affordable resulting in some having to commute to places of work.

Opportunities

- Climate change
 - Likely Impacts that may create opportunities such as changes in flora, fauna and landscape, patterns of recreation and changes in agriculture and its practices
 - Adaption through erecting, raising and strengthening flood defences, retreat from more flood prone locations to make more space for water and linking wildlife habitats to provide resilience
 - Evolving low carbon lifestyles, construction and patterns of land use and settlement.
- Maintaining the recovery and improvement of water quality achieved over the last few decades by long term and continuing action across a range of agencies.
- Potential to put in place environmental and recreational management measures as part of the implementation of major housing and employment growth outside but close to the Broads area.
- To connect wetland habitats on a landscape scale, to enhance and buffer biodiversity rich areas.
- Potential for revival in the use of the area's rivers and railways for freight and passenger traffic.
- Changes in patterns of recreation and expectations of visitors, including impacts of earlier major decline in hire boat fleet and growth of private boat ownership; higher expectation of facilities for leisure plots, holiday chalets and other accommodation.
- Potential for complementary and mutually supportive actions and benefits across environmental, recreational, navigation, and local community issues.
- Provide jobs, facilities, services and homes for local residents through the development plans of constituent Local Authorities.
- The status of the Broads as a National Park equivalent – held in high regard at a local and national level.
- Training opportunities for traditional skills and crafts.
- Encouraging sustainability through the design of buildings as well as innovative designs, new technologies and building in resilience.

Threats

- Climate change - likely Impacts that may be threats
 - Increased frequency and severity of river flooding
 - Increased risk of coastal inundation
 - Changes in water quality and quantity
 - Increased frequency and severity of saline incursion into fresh water systems
 - Changes in flora, fauna and landscape
 - Changes in patterns of recreation
 - Changes in agriculture and its practices
 - Redundancy/degradation of infrastructure and material assets
- Erosion of the special character of the area's landscape and built heritage through.
- Loss of built and cultural heritage.
- Saline intrusion.
- Coastal erosion.
- Incremental 'suburbanisation' and other changes, including through domestic and holiday home extensions/enlargements and paraphernalia;
 - Metalling of unmade tracks;
 - 'Horsiculture' – proliferation of pony paddocks, stables, menagés, etc;
 - Road, rail and navigation improvements/changes;
 - Proliferation of advertisements.

- Potential landscape and economic effects of change, including that driven by market changes (e.g. food prices, bio-fuel).
- Changes in patterns of recreation, including impacts of earlier major decline in hire boat fleet and growth of private boat ownership; higher expectation of facilities for leisure plots, holiday chalets and other accommodation.
- Declining boatyard and boatbuilding industry.
- Loss of local and traditional skills.
- Pinch-points of bridges, no passing places and low levels of infrastructure allied to industry / business and even residential could limit potential for more use of water.
- Major housing and employment growth planned for nearby areas, and associated potential impacts such as:
 - Water quality and quantity loss arising from effluent input and supply extraction.
 - Increased recreational pressure, on both visitor 'honeypots' and remoter, more tranquil and sensitive localities.
 - Traffic growth.
- Passing of the economies, practices and ways of life that generated and sustained those landscapes.
- Unsympathetic design, construction and alterations.
- Loss of local community and/or visitor facilities, often through displacement by higher value activities (principally housing).
- High house prices in the rural areas could affect the willingness of some to train in traditional skills such as reed and sedge cutting as they would need to commute.

Q: Do you have any thoughts on these challenges and opportunities?

7. Vision, objectives and existing policies

7.1 Vision

The current Broads Management Plan (the Broads Plan) sets out a vision for the Broads. This will be reviewed as the new Broads Plan is produced. We will ensure that the vision for the new Local Plan ties in neatly with that of the Broads Plan. The vision will be drafted for the next version of the Local Plan. The current Broads Plan and Core Strategy vision can be found at [Appendix C](#).

Whilst a vision does not form part of the Issues and Options document, the special qualities of the Broads that the Local Plan will seek to protect or enhance (if appropriate) are well known. This list is based on the qualities set out in the Broads Climate Change Adaptation Plan and Landscape Character Assessment.

- Rivers and open water bodies ('broads')
- Fens, reed beds and wet woodlands
- Grazing marshes and ditches
- Flood plains, estuary and coast
- Navigable, lock-free waterways
- Special wildlife
- Countryside access on land and water
- Views, remoteness, tranquillity, wildness and 'big skies'
- The people, the visitors, the activities
- History: geoheritage, cultural heritage, skills, archaeology, traditions, historic structures
- People's interactions with the landscape
- The settlements
- Variety of patterns and textures of the landscape.

Q: Do you have any thoughts on the special qualities of the Broads?

7.2 Objectives of the Broads Local Plan

The objectives of the Local Plan will be finalised as the vision is progressed. Notwithstanding this, we will also look at the objectives of the Core Strategies of our constituent district councils as well as some other National Parks and the Marine Management Organisation.

In the next version of the Local Plan (the Preferred Options) we will have draft objectives that reflect the vision as well as the objectives of neighbouring strategic planning documents as appropriate. The policy approach should then follow on from the objectives and vision.

You may be asking why we are consulting on an Issues and Options version of the Local Plan without these important factors being in place. This is because we are aware of some issues in the Broads that we want to address and these are set out in the Challenges and Issues section. Furthermore, we will be undertaking a 'Preferred Options' consultation stage thus giving the public another opportunity to have their say on firmer objectives. This Issues and Options version of the Local Plan allows us to engage with the public at an early stage and shows our early thinking on the content of the Local Plan. It is also the case that the comments we receive at this stage will help to shape the vision and objectives.

Q: Do you have any thoughts on objectives or vision for the Broads Local Plan?

7.3 Existing Policies

The Broads Authority already has adopted policies in the Core Strategy, Development Management DPD and Sites Specifics Local Plan which are used to determine planning applications.

Many of these policies, or the issues to which these policies relate, are discussed in this Issues and Options document. Each section of this Issues and Options document has a table at the end highlighting which current policies are relevant to that particular theme.

Some of these policies could be carried forward in the new Local Plan, albeit with some changes to ensure they are fully compliant with the NPPF and also to reflect experience gained from using these policies over the years. Alternatively some of these policies could be replaced or removed.

Q: If you have any thoughts on our existing policies, please let us know.

7.4 The next sections of the Issues and Options

The Authority has pulled together evidence from a variety of sources on a variety of issues. We welcome your thoughts and comments on these issues at this initial stage of the Local Plan production process.

Chapters 8 to 18 address environmental issues.

Chapters 19 to 23 relate to economic issues.

Chapters 24 to 30 cover issues relating to the society of the Broads.

Chapter 31 relates to developer contributions and obligations

8. Water

8.1 Introduction

The NPPG asks ‘why should planning be concerned with water supply, wastewater and water quality?’. It goes on to say:

‘Adequate water and wastewater infrastructure is needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.’

The EU Water Framework Directive applies to surface waters (including some coastal waters) and groundwater (water in underground rock). It requires member states, among other things, to prevent deterioration of aquatic ecosystems and protect, enhance and restore water bodies to ‘good’ status. Local planning authorities must, in exercising their functions, have regard to the river basin management plans on the Environment Agency website that implement the Water Framework Directive. These plans contain the main issues for the water environment and the actions needed to tackle them.’

Whilst in general this is the case, it is particularly important in the Broads as it is a wetland system. Abstraction to serve development and wastewater can potentially have a profound impact on the quality of the system. Development and activities within the catchment can impact on the Broads, for example agricultural practices, even if located some way from the Broads, can lead to sediment and chemicals washing downstream to the Broads which can lead to reduced water depth, turbidity and impact on the aquatic system through excess nutrients. These are all matters which planning can influence potentially with close cooperation with neighbouring Local Planning Authorities.

8.2 Water Framework Directive

The EU Water Framework Directive applies to surface waters (including some coastal waters) and groundwater (water in underground rock). It requires member states, among other things, to prevent deterioration of aquatic ecosystems and protect, enhance and restore water bodies to ‘good’ status. Local planning authorities must, in exercising their functions, have regard to the river basin management plans (on the Environment Agency website) that implement the Water Framework Directive. These plans contain the main issues for the water environment and the actions needed to tackle them.

8.3 Water Quality

The NPPG says that plan-making may need to consider:

- *How to help protect and enhance local surface water and groundwater in ways that allow new development to proceed and avoids costly assessment at the planning application stage. For example, can the plan steer potentially polluting development away from the most sensitive areas, particularly those in the vicinity of potable water supplies (designated source protection zones or near surface water drinking water abstractions)?*
- *The type or location of new development where an assessment of the potential impacts on water bodies may be required.*
- *Where particular types of sustainable drainage systems may not be practicable.*

The Broads Authority is actively seeking to improve water quality in other ways:

- **The Broads restoration programme** has been active for over 30 years and it leads the UK in developing and studying lake restoration projects. The programme aims to recreate clear water with healthy aquatic plant growth which provides a habitat for wildlife. Such techniques involve reduction of nutrients from agricultural sources through environmentally sensitive farming practices and educating boat users about environmentally friendly boating. The Lake Restoration Strategy and Action Plan outlines the priority actions for the Broads along with the Biodiversity and Water Strategy.
- Many properties in the Broads are not connected to the **main sewerage system** and use septic tanks or package treatment plants instead. The Environment Agency⁹ is asking householders with septic tanks and package treatment plants to help reduce the amount of the nutrient phosphate entering the waterways.
- Through **the Broadland Catchment Partnership (BCP)**¹⁰ with the Environment Agency, Natural England, and other scientists and wetland landowners and communities, the Broads Authority is seeking practical ways of repairing ecological decline in the Broads. The BCP was formed in 2013 to work together for healthier water and wetlands within the Broads and in the wider area that feeds water into the rivers that flow through the Broads. The Broads Authority co-hosts the BCP with the Norfolk Rivers Trust and co-ordinates the BCP. The BCP has incorporated the Water Quality Partnership to seek practical ways of repairing ecological decline in the Broads. Some of the successes of the BCP include:
 - Completion of the **Broadland Rivers Catchment Plan** which sets out actions for partners in addressing water quality, water levels and run-off.
 - Securing £31K from **Defra's Catchment Partnership Action Fund (CPAF)** for a 'Slow the Flow' project 2015/16 to construct and promote schemes to capture or slow run-off known as Rural Sustainable Drainage Systems (RSuDS). The project should help to improve Water Framework Directive status of water bodies in 2015/16..

8.4 Run off from boat wash down facilities

When vessels are removed from the water, they tend to be washed down. The equipment used to wash the boats down ranges from a pressure hose to a closed loop wash down system that filters contaminants.

The contaminants could be antifouling paint which could then run off into the nearby waterbody. Antifouling paints are applied to boat hulls to prevent growth of organisms, such as algae and mussels. Antifouling paints work by creating a toxic barrier, which prevents organisms attaching to the hull. Fouling increases the resistance of the hull to its movement through the water, which slows the boat and reduces its energy efficiency and manoeuvrability. The loss in efficiency may result in more fuel being used.

Recent research shows that past use of antifouling paints, such as TBT (tributyl tin) based products, had a severe impact on wildlife in the Broads. Although today's antifouling products are less persistent, they are still potentially harmful to aquatic life. For example increased copper levels are now being found in the sediment, which can have harmful effects on water snails.

Our current Development Management Policy DP16 states that 'Any purpose-built wash down facility provided in a mooring basin or marina should enable the filtration and re-use of waste water from the washing of boat hulls'.

⁹ http://www.broads-authority.gov.uk/_data/assets/pdf_file/0010/398791/Env-agency-septic-tanks.pdf

¹⁰ http://www.broads-authority.gov.uk/_data/assets/pdf_file/0020/404318/WQP-Group-Profile.pdf

However there is no reference to how the paint should be disposed of and limited explanation of the policy content.

Issue 1: how should we address run off from boat wash in the new Local Plan?

Options	Potential Content	Issues to Consider
Option 1: Roll forward DP16.	<ul style="list-style-type: none"> As per DP16. 	<ul style="list-style-type: none"> Does not address disposal of antifouling paint. Does not provide detailed reasoning relating to this policy. Could benefit from its own policy.
Option 2: Separate improved policy relating to boat wash down.	<ul style="list-style-type: none"> Similar to DP16. Would relate to storage and disposal of collected waste. 	<ul style="list-style-type: none"> Could provide better reasoning for policy. Could see improved application of this policy content.

8.5 Water Efficiency of New Dwellings

All new homes already have to meet the mandatory national standard set out in the Building Regulations (125 litres/person/day). The NPPG says:

Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

The NPPG goes on to say that the following sources of information could inform changes to policy relating to water resources:

Document	Description	What it says about the Broads Executive Area
The Water Stressed Areas Classification (Environment Agency, 2013).	This identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.	The summary table shows that the area of Essex and Suffolk Water and Anglian Water are water stressed.
Essex and Suffolk Water Resource Management plan (2014)	Essex and Suffolk Water and Anglian Water Services have a statutory duty to prepare and maintain a Water Resources Management Plan (WRMP) under the Water Resources Management Plan Regulations 2007. These set out how the companies plan to maintain the balance between supply and demand over the next 25 years.	Some of the Broads are in the Northern and Central Water Resource Zone. Demand in the WRZ is heavily influenced by the large population centres of Lowestoft and Great Yarmouth. Essex and Suffolk Water were contacted to clarify the following. No Water Resource Zones in Essex and Suffolk Water's area are in deficit. Currently, they are not supportive of 110 l/h/d mainly because of the area not being in deficit but also customer experience of using water facilities and the customer could become frustrated and

Document	Description	What it says about the Broads Executive Area
Anglian Water Services Water Resource Management Plan		replace the efficient water fittings. They consider 125 l/h/d to be reasonable
		<p>North Norfolk Coast and Norwich and the Broads Water Resource Zone.</p> <p>North Norfolk Coast: No deficits are forecast in the North Norfolk Coast RZ. No significant climate change or levels of service sensitivities have been identified. One likely sustainability reduction has been included for a maximum quantity of 1.3MI/d in 2024/25.</p> <p>Norwich and the Broads: Large AMP6 deficits are forecast in the Norwich and the Broads RZ. These result from a sustainability reduction and at the end of the forecast period are equivalent to 51.9MI/d under dry year annual average conditions and 57.6MI/d under critical period conditions.</p> <p>Excluding the WFD no-deterioration and worst case climate change risks, the plan for maintaining the supply-demand balance combines source relocation with water efficiency, enhanced metering and additional leakage control. In the long-term, additional supplies will also be required.</p>
Anglia District River Basin Management Plan.	This describes the river basin district and the pressure that the water environment faces. These include information on where water resources are contributing to a water body being classified as 'at risk' or 'probably at risk' of failing to achieve good ecological status, due to low flows or reduced water availability.	<p>According to some maps, the status of the Broads area varies generally, depending on type of assessment:</p> <ul style="list-style-type: none"> • Groundwater quantitative status – poor. • Abstraction and other artificial flow pressures (rivers) – varies from 'not at risk' to 'probably at risk'. • Abstraction and Flow Regulation - Impact on surface water (groundwater) – at risk. • Abstraction and Flow Regulation - Impact on water balance (groundwater) – probably at risk.

Another source of information is existing water cycle studies completed by our districts.

District	Evidence	Policy	Future plans
Broadland	WCS (2007) was produced for Norwich, SN, BDC, Norfolk County Council and the Broads Authority. 2015 version of the GNGB Water Efficiency Guidance Note	The study resulted in JCS policy 3 being produced, which set more demanding standards for water efficiency in new development than the Building Regulations. However the government has recently required that the most demanding standards be dropped (former code level 6 i.e. 80 litres per person per day for development as of 500 dwellings+) on the grounds that this approach is too expensive. The policy is still valid for developments of less than 500 dwellings and for all of its other aspects.	Likely to be considered through the Norfolk Strategic Framework Infrastructure Group.
Norwich			
South Norfolk			
North Norfolk	Not aware of any evidence.	Core Strategy and Development Management DPD policy relates to Code for Sustainable Homes.	
GYBC	The Water Cycle Scoping Study was a stage 1 report and was completed in 2009. This was not taken any further as the issues raised in the Scoping study were not significant to development plans at the time. This did include the Broads Authority Executive Area.	No policy on reducing water usage to 110 l/h/d. General reference to using water wisely.	
Waveney		Following the changes to National Policy, Waveney DC have produced a position statement:: http://www.waveney.gov.uk/site/scripts/download_info.php?fileID=6779	Likely to commission new study in 2016.

Some of our constituent districts considered water usage to be an issue warranting strong water resource policies in their LDFs. However, new studies will be commissioned in the near future. Future work will be monitored as progress is made and as the next version of the Local Plan is produced. The Broads Authority, at this stage, would still like to explore the potential to reduce water usage in new development beyond Building Regulations.

Issue 2: How to address water efficiency of residential developments in the Local Plan

Options	Potential Content	Issues to Consider
Option 1: do not address water efficiency any further than DP3	<ul style="list-style-type: none"> DP3 encourages water efficient development. 	<ul style="list-style-type: none"> Likely to see dwellings continue to be built to 125 l/h/d. Would not have a great impact on reducing water usage of new development in the Broads.
Option 2: policy requirement for new dwellings to be built	<ul style="list-style-type: none"> All new dwellings to be built to 110 l/h/d Would apply to new 	<ul style="list-style-type: none"> Viability would be an important consideration. Would reduce water resource use of new dwellings.

Options	Potential Content	Issues to Consider
to 110 l/h/d	dwellings/replacement dwellings/conversions. <ul style="list-style-type: none"> Would apply to second and holiday homes. 	<ul style="list-style-type: none"> Would go further than the building regulations.

8.6 Water Efficiency of Non Residential Development

It seems prudent to also consider how the water consumption of non-residential development can be assessed through the Local Plan, reflecting the reasons for the potential to address residential development as set out previously.

There is potential to relate water use of non-residential buildings to BREEAM¹¹ requirements. The Water Calculator Tool¹² can assess a building's consumption of potable water for sanitary use. The credits that are awarded as a result of this assessment reflect the percentage improvement of the proposals against a baseline performance. We are talking to BREEAM about this.

Q: Do you have any thoughts on how the Local Plan should address water usage of non-residential development?

8.7 Water Supply and Wastewater Infrastructure

Anglian Water Services advise that they require more detailed site-specific information to determine the impact of development on water supply and wastewater infrastructure as acceptability in water infrastructure terms is site-related and depends on the local infrastructure. As the assessment of the call for sites is progressed, water supply and wastewater infrastructure will be a key consideration.

Anglian Water is implementing a series of first time sewerage projects of some villages in the Broads Area. Stokesby for example is one area that has benefitted from this project recently.

With regards to how wastewater is transferred from a property, due to the low lying nature of the area and remoteness of some settlements connection to a public sewer is not always possible in the Broads. The alternative disposal methods employed can have a significant local impact on water quality.

Issue 3: How to address sewerage treatment in the Broads.

Options	Potential Content	Issues to Consider
Option 1: roll forward DP3.	<ul style="list-style-type: none"> As per DP3. 	<ul style="list-style-type: none"> Does not specifically discuss extensions as option 3 would.
Option 2: adopt the hierarchy of preferred treatment methods.	<ul style="list-style-type: none"> Similar to DP3. Will further reflect Pollution Prevention Guidance 4 (PPG4)¹³ 	<ul style="list-style-type: none"> Approach not dissimilar to current, but would be formalised in a policy. Would aim for the highest level where possible.

¹¹ A BREEAM assessment uses recognised measures of performance, which are set against established benchmarks, to evaluate a building's specification, design, construction and use.

¹² http://www.breeam.com/BREEAM2011SchemeDocument/Content/08_Water/wat01.htm

¹³ <https://www.gov.uk/government/publications/sewage-treatment-and-disposal-where-there-is-no-foul-sewer-ppg4>

Options	Potential Content	Issues to Consider
Apply to new build and rebuild.	which provides advice to domestic properties on choosing, installing and maintaining septic tanks, package treatment plants and drainage fields, where no foul sewer is available for use.	<ul style="list-style-type: none"> • Could achieve improvements in issues relating to wastewater. • Could affect viability of development. • Would set out clearly the intent of the Broads Authority.
Option 3: the policy as set out in option 2 applies to extensions, new and rebuild.	<ul style="list-style-type: none"> • Similar policy to option 2. • Would apply to extensions as well. 	<ul style="list-style-type: none"> • Need to apply a threshold/definition of the extension type to which this policy would refer. • Same considerations as option 2.
Option 4: promote use of reed bed filtration systems.	<ul style="list-style-type: none"> • Policy includes this as an option. 	<ul style="list-style-type: none"> • This is a more natural way of treating sewerage which provides habitat as well as being a low energy and low carbon option. • Could take more space than other treatment options. • The end discharge from a reed bed system could be similar or even better quality than other methods.

8.8 Horning Knackers Wood Water Recycling Centre

As the Sites Specifics Local Plan was nearing completion, it became apparent through discussions with North Norfolk District Council, Anglian Water Services and the Environment Agency that there were capacity issues at the Horning Knackers Wood Water Recycling Centre. This Water Recycling Centre discharges to the River Bure and contributes nutrient loads to the downstream watercourses as well as the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC)/ Broadland Special Protection Area (SPA).

Both Anglian Water and the Environment Agency agree that the Horning Knackers Wood Water Recycling Centre (WRC) does not currently have capacity to accommodate further foul flows. Anglian Water Services (AWS) have undertaken investigations to identify why the WRC is receiving excessive flows. This work has indicated infiltration from groundwater into the sewer network as the main reason. AWS have developed a scheme to address the infiltration, and by relaying and relining sewers should resolve the issue and provide modest capacity for further foul flows. This scheme was completed in March 2015 and at the time of writing was under monitoring for a subsequent period of 12 months to assess the efficacy of the scheme and whether there is capacity to accept additional flows. As the Local Plan progresses to the next stage, this issue will be monitored.

8.9 Flood Risk

While flooding is a natural process within a flood plain, it can disrupt and endanger life and cause significant damage to property and infrastructure. The Strategic Flood Risk Assessment for the Broads Executive Area and the Environment Agency flood maps¹⁴ place the majority of the area in Flood Zone 3a, defined as 'High Probability' of flooding; over time, with rising sea levels, the majority of the area will be in Flood Zone 3b,

¹⁴ <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

‘The Functional Floodplain’. As such, flood risk is a major constraint on sustainable development in the Broads.

The NPPG defines flood risk as

‘a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.’

The Government emphasises the importance of a **Strategic Flood Risk Assessment** to support the production of Local Plans. The Broads completed a Strategic Flood Risk Assessment in 2007. As part of the Infrastructure Group of the Norfolk Strategic Framework, the issue of updating SFRA will be discussed. The Broads Authority will work with partners and progress will be reflected through the next stage of the Local Plan. Looking at the ‘What’s in Your Backyard’ website of the Environment Agency, it shows that the Broads Authority Executive Area is at risk of surface water flooding, reservoir, sea and river flooding and is an area of flood warnings and flood alerts. This information will be important to the production of any future SFRA which covers the Broads.

The Broads Authority has a **policy** on flooding in the Development Management Policies document (DP29). Before this policy was adopted, to support the Core Strategy (policy CS20), the Authority produced the Development and Flood Risk Supplementary Planning Document. Then following the adoption of the Development Management Policies document, the Government produced the Technical Guidance to the NPPF which includes a section on flooding. We intend to roll forward the Development Management policy, ensuring it is fully in line with the NPPF. We will assess the SPD to ascertain whether we wish to continue using that document, replace it with a more up to date SPD or rely on local and national policy as well as the Technical Guidance.

We will work with Suffolk and Norfolk County Councils as the **Lead Local Flood Authorities** as the Local Plan progresses. The Flood Investigation Reports (formal investigations into flooding events) as well as Register of Assets (shows structures such as Pumping Stations, Flood Defence Banks, Weirs and Sluices currently being used to manage flood risk and drainage across the county) of each of the LLFAs could be of importance to the Local Plan.

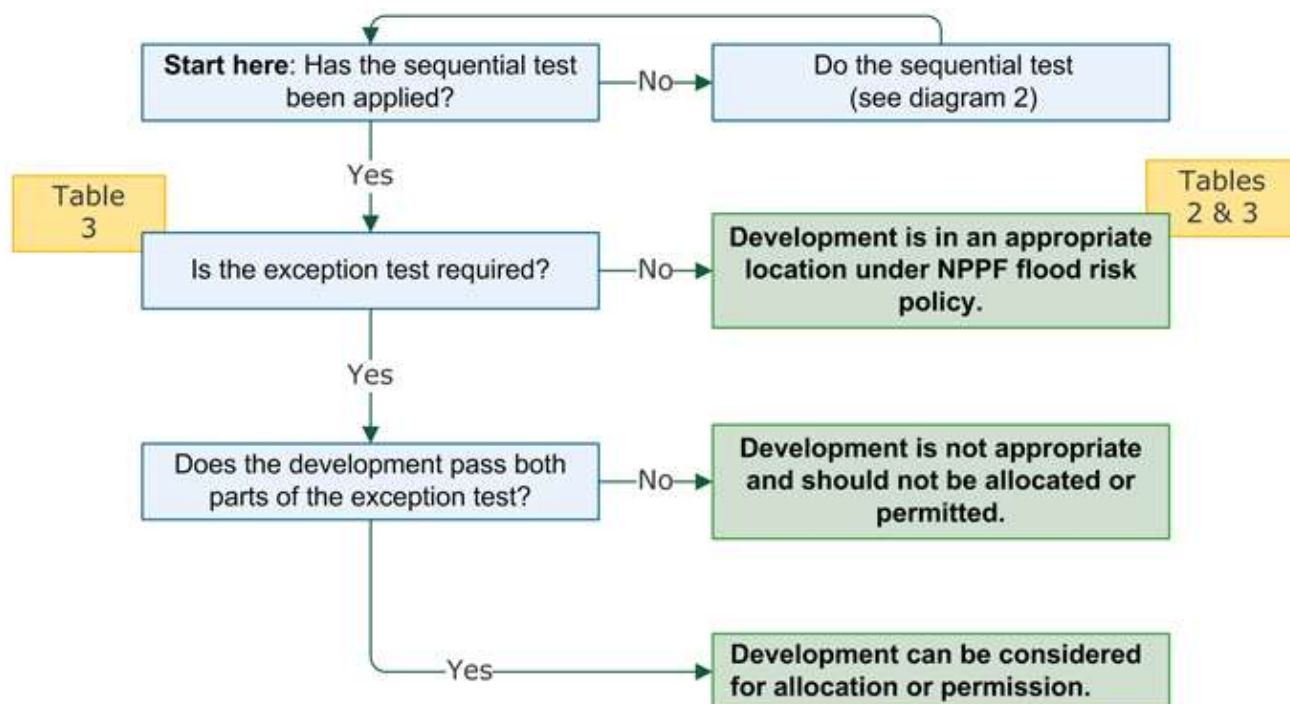
The underlying principle of development and flood risk is summarised in the NPPF (100): *‘Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere’*. As the **site allocations** part of the Local Plan progresses, flood risk to specific sites will be an important consideration. The NPPF paragraph 100 goes on to say:

Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- *applying the Sequential Test;*
- *if necessary, applying the Exception Test;*
- *safeguarding land from development that is required for current and future flood management;*
- *using opportunities offered by new development to reduce the causes and impacts of flooding; and*

- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

We will use the Technical Guidance for the **Sequential and Exception Tests** as we formulate site allocations for various types of development. The process is neatly summarised in this diagram from the NPPG.



The Government also states in the NPPG that ‘*Local authorities and developers should seek opportunities to **reduce the overall level of flood risk in the area and beyond***’. As the Local Plan is progressed, we will seek opportunities to reduce the overall level of flood risk.

Anecdotally, some of the developers in the Broads report that **flooding in the Broads is different** to elsewhere. They consider that there should be a different approach to considering flood risk in the Broads as opposed to relying on national policy.

Q: Do you have any thoughts on flood risk in the Broads Executive? Do you have any thoughts on how the Local Plan should address flood risk? Is there scope to have a Broads-specific exceptions test?

8.10 Sustainable Drainage Systems (SuDS)

SuDS are the current favoured technique for dealing with surface water and the Broads is ideally suited for this sort of approach as ditches and other forms of holding basins are characteristic of the landscape. Examples of SuDS include retention ponds (a depression which holds water even during dry weather

conditions) and swales (long vegetative depression which is normally dry except during and after heavy rainfall).

The NPPG says:

Sustainable drainage systems are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible. They provide opportunities to:

- *reduce the causes and impacts of flooding;*
- *remove pollutants from urban run-off at source;*
- *combine water management with green space with benefits for amenity, recreation and wildlife.*

As we progress the site allocations section of the Local Plan, we will follow Government guidance to see if SuDS are required on the site as well as assess if any particular SuDS technique is inappropriate. We will ensure we discharge surface water run off as high up the following **hierarchy** (as set out in the NPPG) as possible:

- into the ground (infiltration);
- to a surface water body;
- to a surface water sewer, highway drain, or another drainage system;
- to a combined sewer.

Q: Do you have any thoughts on how the Local Plan should address SuDS and whether there should be any requirement for particular types of SuDS in the Broads?

Rural SuDS slow down or prevent the transport of pollutants to watercourses by breaking the delivery pathway between the pollutant source and the receptor. By intercepting run-off and trapping sediment before it leaves the field they help maintain and manage the provision of good water quality by preventing the loss of soil, chemicals, nutrients and faecal organisms. The Broads Catchment Partnership secured £31,000 from Defra's Catchment Partnership Action Fund (CPAF) for a 'Slow the Flow' project 2015/16 to construct and promote demonstration Rural Sustainable Drainage Systems (RSuDS). The fund is for projects that help to improve Water Framework Directive status of water bodies in 2015/16.

8.11 Evidence that has informed this section:

Water stressed areas – final classification July 2013 Developed by the Environment Agency and Natural Resources Wales:	http://planningguidance.planningportal.gov.uk/blog/guidance/housing-optional-technical-standards/water-efficiency-standards/
Anglian District River Basin Management Plan	https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan
AWS Water Resources Management Plan	http://www.anglianwater.co.uk/environment/our-commitment/our-plans/water-resource-management.aspx

Essex and Suffolk Water Resource Management Plan	https://www.eswater.co.uk/your-home/environment/water-res-man-plan.aspx
Broadland Rivers Catchment Plan	http://www.broads-authority.gov.uk/_data/assets/pdf_file/0004/457177/Catchment-Plan-website-final.pdf
Anglian Water Services Strategic Direction Statement	http://www.anglianwater.co.uk/about-us/statutory-reports/strategic-direction.aspx
Technical Guidance to the National Planning Policy Framework	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6000/2115548.pdf
Strategic Flood Risk Assessment (2007)	Not available for download.
Broads Development and Flood Risk SPD (2008)	http://www.broads-authority.gov.uk/_data/assets/pdf_file/0005/421646/EPS4.pdf
Greener and Cleaner (Broads Authority)	http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/398625/Greener and cleaner .pdf

8.12 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS20	Core Strategy	
DP3	Development Management	
DP4	Development Management	
DP29	Development Management	
Mentioned in numerous Site Specific Policies		

9. Open Space (land and water), Play and Allotments

9.1 Introduction

Open space, play areas and allotments provide for a variety of recreational, sporting, play and social needs for the community.

The provision of public **open spaces** is essential in promoting active living and providing important physical, psychological and social health benefits for the community. Public open space can also contribute to mental health and community wellbeing. The NPPF defines open space as ‘*all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity*’. The Broads is therefore well provided for in terms of open space in relation to water. The NPPF goes on to say:

*73: Access to high quality **open spaces** and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for **open space**, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of **open space**, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what **open space**, sports and recreational provision is required.*

The Government is clear in the importance of **play**. The NPPG says:

*‘A good mix of uses and tenures is often important to making a place economically and socially successful, ensuring the community has easy access to facilities such as ... **play areas**....’*

*‘The most successful spaces ... include facilities such as seats and **play** equipment.’*

*‘Active healthy lifestyles that are made easy ... safe places for active **play** ...’*

*‘The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and **play** in the same area.’*

Allotments are part of the definition of Green Infrastructure (see 10.1) and also can be designated a Local Green Space (see 10.3). Allotment gardening:

- Brings people together from all age groups around a common interest
- Increases people's awareness about food and how it is made and grown and can encourage people to eat more fresh vegetables and fruit.
- Offers healthy physical recreation for all people.

9.2 The Issue

Currently there is no formal approach to providing for play, allotments or open space in the adopted policies of the Broads Authority. To date we have relied on liaison with our constituent district councils who have standards for such infrastructure as well as being the organisation to usually adopt and maintain open space and play.

Some of the Authority's constituent councils have adopted the Community Infrastructure Levy (CIL) and play, allotments and open space are part of the charging schedule. There is no CIL in the Broads Authority and therefore the Authority relies on S106 agreements (to which there are pooling restrictions now in place – see [Developer Contributions/Planning Obligations](#) for more information).

The new Local Plan offers the opportunity to acknowledge the importance of play and open space and formalise the approach to the provision of these infrastructure types.

9.3 Play, Open Space (land), Allotments and our Constituent Authorities

The following table sets out the approach currently taken by our constituent councils. They were also asked about their plans for updating their data and potential approach to open space, allotments and play as they review their policies when producing their new Local Plans.

Council	Play – current approach	Open Space (land) – current approach	Allotments – current approach	Future Plans (May 2015)	CIL Status
Broadland	<ul style="list-style-type: none"> Development Management Policies RL1 relating to on-site provision. Children’s Play Strategy 	<ul style="list-style-type: none"> Development Management Policy EN3, RL1 sets a standard relating to on-site provision. SPD on recreational Open Space (2007) PPG17 Open Spaces Indoor Sports and Community Recreation Assessment (2007) PLAYING PITCH STRATEGY & ACTION PLANS GREATER NORWICH AREA FINAL STRATEGY (OCTOBER 2014) 	<ul style="list-style-type: none"> Development Management Policy EN3 sets standards relating to on-site provision. Some Site Allocations policies refer to allotments 	<ul style="list-style-type: none"> New SPD being produced. 	<ul style="list-style-type: none"> CIL in place. Open space and play on Regulation 123 register.
Great Yarmouth ¹⁵	<ul style="list-style-type: none"> Draft Core Strategy CS9, CS15 and CS18 refers to play being an integral part of developments Has a playground map showing where facilities are. Open Space Study 2013. 	<ul style="list-style-type: none"> Open Space Study 2013. 	<ul style="list-style-type: none"> Open Space Study 2013. 	<ul style="list-style-type: none"> Development Management and Site Allocations Local Plan will commence summer 2015. Potential Planning Obligations SPD. Sport, Play and Leisure Strategy underway. 	<ul style="list-style-type: none"> No CIL as at May 2015.
Joint Core Strategy	<ul style="list-style-type: none"> No Planning related references to play 	<ul style="list-style-type: none"> Refers to Open Space with associated policies. 	<ul style="list-style-type: none"> Policy 20 in relation to open space and allotments, which are identified as essential infrastructure to secure sustainable development. Policies 7 and 8 show generic support for open space provision as part of supporting sustainable communities. 	<ul style="list-style-type: none"> Joint Core Strategy review at an early stage. 	<ul style="list-style-type: none"> Constituent Authorities have CIL.
North Norfolk	<ul style="list-style-type: none"> Core Strategy refers to Play standards. North Norfolk Open Space and Recreation Study, July 2006. 	<ul style="list-style-type: none"> North Norfolk Open Space and Recreation Study, July 2006. Development Management Policy CT1 and Appendix A sets standards. 	<ul style="list-style-type: none"> Core Strategy sets standards 	<ul style="list-style-type: none"> Review existing study as produce new local plan. 	<ul style="list-style-type: none"> No CIL as at May 2015.
Norwich	<ul style="list-style-type: none"> Development Management Policies DM8 sets standards. Norwich City Play Strategy (2007) 	<ul style="list-style-type: none"> Open Space Needs Assessment 2007 Development Management Policy DM8 sets standards PLAYING PITCH STRATEGY & ACTION PLANS GREATER NORWICH AREA FINAL STRATEGY (OCTOBER 2014) 	<ul style="list-style-type: none"> Development Management Policy DM8 includes allotments but not standards. 	<ul style="list-style-type: none"> Review existing study as produce new local plan. 	<ul style="list-style-type: none"> CIL in place. Open space and play on Regulation 123 register.
South Norfolk	<ul style="list-style-type: none"> Recreational Open Space Requirements for Residential Areas (1994) 	<ul style="list-style-type: none"> Development Management Policy DM3.16 Recreational Open Space Requirements for Residential Areas (1994) PLAYING PITCH STRATEGY & ACTION PLANS GREATER NORWICH AREA FINAL STRATEGY (OCTOBER 2014) 	<ul style="list-style-type: none"> Not currently addressed. 	<ul style="list-style-type: none"> Updating play and open space standards document. 	<ul style="list-style-type: none"> CIL in place. Open space and play on Regulation 123 register.
Waveney	<ul style="list-style-type: none"> Waveney Play Partnership: oversees the development and delivery of the local Waveney Play Strategy and action plan for the Waveney District. Open Space Supplementary Planning Document - January 2012. 	<ul style="list-style-type: none"> Consultation on Open Space Needs Assessment Jan 2015. Open Space Supplementary Planning Document - January 2012. Development Management policy DM25 sets standards. 	<ul style="list-style-type: none"> Allotments, Cemeteries and Churchyards Needs Assessment: Supplement to the Open Space Needs Assessment (July 2007). Now replaced by the Open Space Needs Assessment and Green Infrastructure Strategy. 	<ul style="list-style-type: none"> Open Space Needs Assessment and Green Infrastructure Strategy (August 2015). 	<ul style="list-style-type: none"> CIL in place. Open space and play on Regulation 123 register.

¹⁵ GYBC’s Core Strategy at examination stage at May 2015. Development Management Policies to follow.

Issue 4: How to address land-based open space, allotments and play requirements in the Broads.

Options	Potential Content	Issues to Consider
Option 1: do not address play, allotments and open space in the Local Plan	-	<ul style="list-style-type: none"> Effectively continuing the current approach - leave it for the planning application discussions. An informal approach. Issue of some open space and play policies being superseded as CIL introduced which will affect off-site provision only.
Option 2: set specific rates for play, allotment and open space in the Broads.	<ul style="list-style-type: none"> Would reflect bespoke evidence base. Would set open space standards for schemes in the Broads. 	<ul style="list-style-type: none"> Work relating to such standards will be required. It is important to note that districts assess their entire area for open space and play provision, including that which is the Broads. Repeating assessment work could skew open space and play provision. The NPPF is clear in requiring Local Plans to be produced based on existing evidence where possible and in a proportionate manner.
Option 3: include a policy that refers/defers to existing and future play and open space policies in constituent district's policy documents	<p>If above the relevant council's threshold for on-site contributions:</p> <ul style="list-style-type: none"> Defer to standards and/or policies of constituent councils for on-site provision. Regarding off-site contribution, assess on application by application basis in liaison with the relevant council and use planning obligations where appropriate and viable to secure contributions. <p>If below threshold for on-site contributions:</p> <ul style="list-style-type: none"> If relevant council has CIL in place, base off-site commuted sum on that Council's commuted sum rates which could be pre-CIL and adjusted for inflation. 	<ul style="list-style-type: none"> It is important to note that districts assess their entire area for open space and play provision, including that which is the Broads. Pooling restrictions for S106 schemes will apply. Will formalise the approach to onsite and offsite open space and play provision for developments above the threshold. Discussions with councils indicate that their Local Plan process is around six months to a year behind the Broads. As such, it is possible to work with the districts on this issue as the Broads and their Local Plans are produced.
Option 4: have a less specific policy which discusses principles of open space, play and allotments.	<ul style="list-style-type: none"> Could be a criteria based policy. General principles about allotments, play and open space. 	<ul style="list-style-type: none"> Could still defer/refer to our constituent district's policy for specifics. Could be Broads-specific criteria that inform the design of the open space, rather than the amount.

9.4 Water open space

The water open space of the Broads can be enjoyed by:

- being on the water by hiring a boat, sailing, canoeing, waterskiing where permitted etc
- being by the water at the open spaces and paths and roads that run by the water.
- being in the water where open water swimming events are permitted and organised.

A **staithe** (as defined in the 1988 Broads Act) means any land which is adjacent to a waterway and which the inhabitants of the locality are entitled to use as a landing place. A staithe is for loading and unloading.

There have been a number of instances where staithe have been possessed by individuals. For example they can be fenced off or claimed as an individual's property. By losing staithe, there is a negative impact on public access to the water as well as use of the staithe for loading. The Broads Act 1988 sets powers on the Broads Authority to protect the existence of staithe and the ability of the public to use and access them (Part 2, section 37).

The Authority has commissioned the University of East Anglia (UEA) to undertake a study on staithe on the Broads. This will look into their history, identify their type as well as understand what rights relate to specific staithe. This is likely to be completed early in 2016. This work will be assessed as future versions of the local plan are produced.

There are gaps in slipway provision/canoe **launching facilities** throughout the Broads, but a high demand for facilities for these small boats to access the water. The Authority has identified priority stretches of water for the provision of improved access to the water. It is intended that this work will be refreshed.

As sites are allocated in later stages of the Local Plan production, they will be assessed for their potential to provide launching facilities as part of their development.

Q: Do you have any thoughts on water open space, staithe and slipways?

9.5 Evidence that has informed this section:

Waveney Open Space and Developer Contributions (2012)	http://www.waveney.gov.uk/site/scripts/download_info.php?fileID=2925
Norwich City Council ANNEX TO OPEN SPACE AND PLAY PROVISION ADOPTED SPD (2013)	http://www.norwich.gov.uk/Planning/documents/Openspaceandplayannexcommutedsums.pdf
PLAYING PITCH STRATEGY & ACTION PLANS GREATER NORWICH AREA FINAL STRATEGY (OCTOBER 2014)	http://www.south-norfolk.gov.uk/planning/media/G7_Greater_Norwich_Pitch_Strategy_Oct_2014.pdf
North Norfolk Open Space and Recreation Study, July	https://www.northnorfolk.org/files/Open_Space_Study_-_Volume_1.pdf

2006.	
Great Yarmouth Borough Council Open Space Study 2013.	http://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1237&p=0
Slipway audit.	Link to follow.

9.6 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
DP12	Development Management	
DP30	Development Management	
ACL2	Sites Specifics	
DIT1	Sites Specifics	
HOR3	Sites Specifics	
TSA6	Sites Specifics	
THU1	Sites Specifics	

10. Green Infrastructure

10.1 Introduction

The NPPF defines Green Infrastructure (GI) as:

... a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Green Infrastructure typologies include:

- **Parks and Gardens** – urban parks, Country and Regional Parks, formal gardens
- **Amenity Greenspace** – informal recreation spaces, housing green spaces, domestic gardens, village greens, urban commons, other incidental space, green roofs
- **Natural and semi-natural urban greenspaces** - woodland and scrub, grassland (e.g. downland and meadow), heath or moor, wetlands, open and running water, wastelands and disturbed ground), bare rock habitats (e.g. cliffs and quarries)
- **Green corridors** – rivers and canals including their banks, road and rail corridors, cycling routes, pedestrian paths, and rights of way
- **Other** - allotments, community gardens, city farms, cemeteries and churchyards

Green Infrastructure can provide the following benefits:

- contributes to high quality and accessible landscapes benefitting people and wildlife;
- plays an essential role in maintaining and enhancing the health of the natural environment and its ability to provide a wealth of 'ecosystem services';
- increases ecological connectivity to overcome habitat fragmentation and increase the ability of the natural environment to adapt to climate change;
- in coastal locations, helps to provide recreational space and to enhance and protect our marine environment;
- creates attractive and accessible places for people to socialise, enjoy direct and regular contact with as well as learn about the natural environment;
- strengthens links between urban areas and their surrounding countryside, and brings the natural world into every neighbourhood, with benefits for individual and community health and wellbeing;
- supports the efficient management of water resources. A network of green spaces reduces the likelihood of flooding by allowing water to permeate through the ground;
- can act as flood storage areas, holding large volumes of water in temporary ponds to protect built up areas from flooding;
- can also contribute to delivery of sustainable land management;
- can also create a range of social and economic benefits, both directly (through employment in capital projects and future management) and indirectly (increased visitors and visitor spend);
- supports functioning ecosystems and robust natural systems for the management of basic resources such as water, clean air, soil, and the maintenance of biodiversity;
- delivers a broad range of ecosystem services and linked social and economic benefits that clearly demonstrate the relevance of the natural environment to the lives and livelihoods of individuals and communities;
- makes a direct contribution to the climate change 'proofing' of peoples' homes and communities; and
- enhances the self sufficiency of communities through providing local food production and recreational areas.

10.2 Strategic Green Infrastructure

It is important to note that the Broads Authority makes its own contribution to the delivery or maintenance of Green Infrastructure in the following ways for example:

- Land management schemes such as livestock grazing and digging or creating scrapes to enhance biodiversity.
- Providing and maintaining areas for recreation such as Carey's Meadow in Norwich.
- Promoting, maintaining and providing tracks, paths and trails.

The NPPF says:

114. 'Local planning authorities should:

- *set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'*

Issue 5: how do we address Green Infrastructure in the Broads Executive Area?

Options	Potential Content	Issues to Consider
1: Roll forward existing policies only.	<ul style="list-style-type: none"> • As per current policies. 	<ul style="list-style-type: none"> • Issues discussed in option 2 not addressed. • Would relate to those sites that are already covered by policy. So no policy on other potential GI projects.
2: A Strategic Green Infrastructure Policy	<ul style="list-style-type: none"> • A criteria based policy which could cover such aspects as: <ul style="list-style-type: none"> ➤ protect landscape, habitat and biodiversity assets; ➤ demonstrate how schemes have taken GI into account in scheme design and delivery, and ➤ not compromise the delivery of GI studies of constituent districts. • Could also reflect forthcoming evidence base relating to the recreational impact of visitors to protected sites. • Could include content of the current more strategic GI policies. 	<ul style="list-style-type: none"> • Would elevate importance of Green Infrastructure in the Local Plan. • Could aid the delivery of GI to the benefit of wildlife and people outside of the Broads Executive Area.
3: Specific policies covering some GI projects.	<ul style="list-style-type: none"> • Policy content would reflect the specific element of Green Infrastructure. • Could also reflect forthcoming evidence base relating to the recreational impact of visitors to 	<ul style="list-style-type: none"> • Projects could originate from the Authority's work or from constituent Council's Green Infrastructure Studies. • Could aid the delivery of these projects and prevent them from

Options	Potential Content	Issues to Consider
	protected sites.	being obstructed.

10.3 Local Green Space

Communities are now able to identify areas of green space that are of particular importance to them. The NPPF states that:

*76. 'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as **Local Green Space** local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period'.*

Q: Are there any areas you would like to nominate as Local Green Space?

Please note that Village Greens and Common Land are protected under different legislation¹⁶.

We would like you to consider whether there is any green space in your area that you feel meets the criteria set out below. If you feel there is an area of Local Green Space that you wish to nominate for allocation, please get in touch. You will need to fill out the form at Appendix D and state how/why the green space meets the criteria set out in the NPPF (see below). You will also need to provide a map with a line around the green space and you may wish to consider including some photographs of the area with your nomination. Your nomination will then be assessed by a panel of Officers from the Broads Authority as well as the relevant District Council. We will allocate draft Local Green Spaces in the next version of the Broads Local Plan. If we do not take your proposal forward, we will explain why we think it is not suitable.

Please note that:

- You need to use the form at Appendix D to nominate an area.
- We need a map that clearly shows the area nominated.
- We cannot guarantee that your nomination will be allocated a Local Green Space as the nomination may not meet the criteria.
- Your nomination will be made public.

A nomination for Local Green Space needs to meet the following criteria (in no particular order):

- If protected, do you think the green space will remain as green space to 2036 and beyond?
- How far is the green space from the community it serves?
- Why/how is this green space special/how is it significant to the local community? (For example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife)?

¹⁶ <https://www.gov.uk/common-land-village-greens>

- Is the green space local in character?

10.4 Evidence that has informed this section

Natural England's Green Infrastructure Guidance (NE176)	http://publications.naturalengland.org.uk/publication/35033
Open Spaces Society Information Sheet	http://www.oss.org.uk/wp-content/uploads/2014/03/C20-Local-Green-Space-Designation.pdf
Get the green space you want: How the Government can help	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5907/2203637.pdf

10.5 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS1	Core Strategy	
CS4	Core Strategy	
CS17	Development Management	
DP1	Development Management	
DP2	Development Management	
DP11	Development Management	
ACL1	Sites Specifics	
ACL2	Sites Specifics	
BRU5	Sites Specifics	
HOR3	Sites Specifics	
HOV2	Sites Specifics	
NOR1	Sites Specifics	
NOR2	Sites Specifics	
POT3	Sites Specifics	
TSA1	Sites Specifics	
TSA6	Sites Specifics	
WHI1	Sites Specifics	
XNS3	Sites Specifics	
XNS7	Sites Specifics	

11. Climate Change

11.1 Introduction

The low-lying and coastal nature of the Broads and the dominance of water as a feature in the landscape make it particularly vulnerable to the effects of climate change and sea level rise. The current projections are that by mid-century we will start to see significant climate change and early adaptation planning is likely to save money and better protect property and lives in the long run. It is important to note that other sections of this Issues and Options document are of relevance to climate change, including renewable energy, transport, peat, flood risk and green infrastructure.

11.2 The likely effects of a changing climate

The UK CIP (Climate Impacts Programme) 2009 'medium emissions' scenario for the East of England predicts the following by the end of the century:

- Warmer, wetter winters
- Drier, hotter summers
- More frequent and more intense extreme events (e.g. storms and heavier rainfall)
- Sea level rise on the Norfolk and Suffolk coast of 1m

Some potential impacts of these scenarios may be beneficial. For example the increase in winter temperatures could lengthen the tourist season. However, there are a range of impacts that would be negative such as the combination of increased maximum temperature, increased water temperature in water bodies and reduced precipitation increasing the probabilities of blue green algal blooms, eutrophication and excessive growth of surface aquatic vegetation. These would affect the health of the freshwater system as well as affect tourism (through the loss of some key species which were an attraction as well as affecting the attractiveness of the waterscape for example). Furthermore, the increased stream temperature may affect the overall distribution and abundance pattern of freshwater species by favouring warm water rather than cold water species. Finally, the current projections are for a global sea level rise of up to 0.98m by the end of the century. Even a 0.37m rise will mean that sea water will move further upstream in extreme tides and air draught under bridges at high tide could be reduced. The influx of saltwater will impact the distribution of the terrestrial and aquatic flora and fauna of the Broads.

11.3 How can we approach climate change?

So the threat to the Broads from climate change is real and varied. There are two general approaches to the issue of climate change, both of which have a role.

- Climate change adaptation and resilience is about being prepared for a changing climate. For example connecting up habitats to allow species to move according to climate conditions or identifying particular areas ready to take excess water in times of flood.
- Climate change mitigation is about reducing greenhouse gas emissions through changing behaviour. For example improving housing insulation to reduce energy demand, installing solar panels so relying less on fossil fuels and using the car less.

11.4 National Policy Context

The NPPF at Paragraph 93 says:

‘Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development’

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to include in their Local Plans:

‘policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change’.

National Planning Policy Guidance says:

‘When preparing Local Plans and taking planning decisions local planning authorities should pay particular attention to integrating adaptation and mitigation approaches and looking for ‘win-win’ solutions that will support sustainable development.’

Issue 6: how should we address climate change in the Local Plan?

Options	Potential Content	Issues to Consider
Option 1: Roll forward existing policy CS8.	<ul style="list-style-type: none"> • A high level policy. • General refresh required. 	<ul style="list-style-type: none"> • The current policy only relates to mitigation and doesn’t guide adaptation and resilience
Option 2: Climate Change Ready and Carbon Reduction guide.	<ul style="list-style-type: none"> • Covers adaptation, resilience and mitigation. 	<ul style="list-style-type: none"> • Intended to help encourage developers consider climate change when designing schemes. • Could relate to the current Sustainable Development in the Broads guide. •
Option 3: Scoping of development type and scale.	<ul style="list-style-type: none"> • Likely to be part of a policy that requires further action relating to considering climate change. • Would scope out need for further action relating to climate change to reflect type and scale of development. 	<ul style="list-style-type: none"> • Would effectively set a threshold of development type and size to which any policy applies. • Would ensure that any requirements are not applied unnecessarily.
Option 4: Require assessment as part of applications showing how climate change mitigation and adaptation have been incorporated into the design of the proposal and how the	<ul style="list-style-type: none"> • A checklist type approach where detail can be written (by applicant) showing how the scheme meets each criterion. • Would highlight the consideration given to mitigation and low carbon options along with resilience and adaptation needs to accompany the application. 	<ul style="list-style-type: none"> • Would accompany planning applications. • Developers may find the checklist onerous to follow/complete. • Likely to need a threshold/trigger for when actions would be required. • Understanding is still growing and could be a challenge for producing

Options	Potential Content	Issues to Consider
development will be used.		<p>the checklist as well as assessing if its content is sufficient.</p> <ul style="list-style-type: none"> • The range of responses could be great and a fair process of gauging appropriateness would be needed. • Would there be a willingness to block development if checklists were insufficient?
Option 5: community or landscape scale mitigation or adaptation.	<ul style="list-style-type: none"> • Proposals could only mitigate or adapt to a limited extent on site. • Could contribute to a larger community wide scheme. • Could be a monetary contribution to a pot. 	<ul style="list-style-type: none"> • Viability to be considered. • S106 pooling contribution restrictions of importance. • Threshold to reflect scale and type of development?

Energy previously expended in the construction of existing buildings should be a consideration taken into account in development proposals.

11.5 Evidence that has informed this section

2009 Met Office UK Climate Projections.	http://ukclimateprojections.metoffice.gov.uk/
Broads Climate Adaptation Plan (Revised draft June 2015)	http://www.broads-authority.gov.uk/looking-after/climate-change
The Potential Impacts of Climate Change on the Norfolk Broads,	Price (2013). http://www.broads-authority.gov.uk/_data/assets/pdf_file/0003/438816/Jeff-Price-report.pdf
Sustainability Guide (Broads Authority)	http://www.broads-authority.gov.uk/_data/assets/pdf_file/0015/410307/SustainabilityGuide.pdf

11.6 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF Compliant?
CS4	Core Strategy	
CS8	Core Strategy	
DP2	Development Management	
DP4	Development Management	
DP7	Development Management	
DP8	Development Management	

12. Peat

12.1 Introduction

Peat is an abundant soil typology in the Broads and is an important asset as it provides many ecosystem services:

- **Climate change:** The flood plain fen peat soils formed by the Broads wetland vegetation stores 38.8 million tonnes of carbon (NCA Profile 80, Natural England). Peat soils release previously stored carbon when they are dry. UK peats represent both a threat and an opportunity with respect to greenhouse gas emissions because correct management and restoration could lead to enhanced storage of carbon and other greenhouse gases in these soils while mismanagement or neglect could lead to sinks becoming net sources of greenhouse gases.
- **Biodiversity:** Peat soils support internationally important lake, fen, fen meadow, reed-bed and wet woodland habitats. Some 75 per cent of the remaining species-rich peat fen in lowland Britain is found in the Broads. Milk Parsley only grows on peat soils and this is the food plant of the Swallowtail Caterpillar. Fen Orchids have their UK stronghold in the Broads so the peat soils in the Broads are critical for the survival of this species. Rare plant and invertebrate communities (collection of species) are supported by the peaty soils.
- **Archaeology:** From around the 11th Century, the demand for timber and fuel was so high that most woodland was felled, and the growing population then began digging the peat in the river valleys to provide a suitable fuel alternative. Rising sea levels then flooded these early commercial diggings and, despite numerous drainage attempts, the flooding continued and subsequently today's broads were formed. Historic England has identified the Broads as an area of *exceptional waterlogged heritage*. Fundamentally, because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved giving an insight into the past. Archaeology is discussed in more detail in the [Heritage section](#) of this document.
- **Palaeoenvironments:** The peat has accumulated over time and thus incorporates a record of past climatic and environmental changes that can be reconstructed through, for example, the study of its stratigraphy and pollen content. This leads to increased knowledge of the evolution of the Broads landscape.
- **Water:** Peaty soils help prevent flooding by absorbing and holding water like a sponge as well as filtering and purifying water. Peat can absorb large quantities of nutrient and other pollutants, although peat soils can under certain conditions release these chemicals back into the surrounding water.

12.2 The Issue

Peat is a finite resource taking thousands of years to form. It can be destroyed in a matter of hours. Land management that could impact on the quality of the peat includes: land drainage, introduction of polluted water, burying the peat under hard surfaces or gardens and peat removal to change the land use. Peat is not a habitat that can easily be recreated elsewhere. Some practices can also compact peat. It should be noted that on occasion, for nature conservation benefits, peat can be removed to create very shallow turf ponds or scrapes (areas of temporary open water) on areas of fen or scrub habitat to maximise the biodiversity value and hold back succession to woodland habitat.

The NPPF and NPPG only mention peat in relation to its excavation as a mineral resource rather than the issue in the Broads relating to impact due to groundworks from development and inappropriate land management:

NPPF 143: *'identify and include policies for extraction of mineral resource of local and national importance in their area, but should not identify new sites or extensions to existing sites for peat extraction'*

NPPF 144: *'not grant planning permission for peat extraction from new or extended sites'*

Issue 7: how should we address peat affected by land use change in the Broads?

Options	Potential Content	Issues to Consider
Option 1: No specific policy	<ul style="list-style-type: none"> Rely on existing policy DP1 	<ul style="list-style-type: none"> The current situation is continued whereby there is no specific policy on peat. This does not address the loss of peat and the effect on water, biodiversity, climate change and archaeology (ecosystem services).
Option 2: A policy which seeks to minimise peat disruption	<ul style="list-style-type: none"> Development that is on peat and requires earth works should be designed in such a way so as to minimise disturbance to the qualities of the peat and the amount of peat removed. This could be a smaller development or different layout to reduce the amount of the development affecting peat. Development proposed on areas of peat would require a peat assessment which shows how efforts have been made to reduce adverse impacts on peat. Proposals to enhance peat and protect its qualities will be supported. Development that over-compacts peat by trafficking across it with heavy machinery and affects its ability to hold or transmit water would be resisted. Archaeological assessment for development proposals in peat required. 	<ul style="list-style-type: none"> A certain irony in protecting the peat in an area where the lakes originated from peat extraction. Could be seen as 'tinkering at the edges' rather than fundamental protection of peat. But could reduce the amount of peat that is removed by development (thus protecting its qualities). Removal of peat can be necessary for conservation management e.g. the most biodiverse areas of fen occur on turf stripped areas. Such scrapes are very shallow. The assessment process could draw out the issues around some actions that benefitted certain aspects of the peat but were problems for other qualities e.g. introduction of polluted water. Does not necessarily address the issue of archaeology.
Option 3: A policy which seeks to	<ul style="list-style-type: none"> Could require that peat which is affected as a result of 	<ul style="list-style-type: none"> A form of mitigation rather than a way of protecting peat in situ.

Options	Potential Content	Issues to Consider
address the disposal of peat	<p>development is disposed of in a way to limit carbon loss to the atmosphere.</p> <ul style="list-style-type: none"> • Could be additional content to option 2. • Proposals to enhance peat and protect its qualities will be supported. 	<ul style="list-style-type: none"> • A certain irony in protecting the peat in an area where the lakes originated from peat extraction. • Peat needs to go somewhere where it can remain wet (and hence retain its function to lock up carbon and prevent it being released into the atmosphere), potentially provide a seedbank (the potential for ancient peat to provide a viable seedbank may need to be evidenced) or be reused for local benefit (for example by boosting organic matter in degraded arable soils). • Guidance would need to be developed to support this. • Would be unique and difficult to do unless had adjacent site to that being developed. • When dry, peat loses its properties and oxidizes, so transfer would need to be immediate. • Does not necessarily address the issue of archaeology. • Best left in situ.
Option 4: Provide guidance to elaborate on any policy which seeks to minimise peat disturbance and/or seeks reuse of peat	<ul style="list-style-type: none"> • Detailed advice on minimising removal of and minimise adverse impacts to peat. • Detailed advice on the re-use of peat. 	<ul style="list-style-type: none"> • Guides tend to be welcomed by developers in the Broads. • Would expand on policy. • Would give detailed advice and be consulted on to give more weight in the planning system.
Option 5: Offsetting the loss of peat	<ul style="list-style-type: none"> • Would relate to reducing the impact on peat as discussed at Option 2. That is to say that if peat is to be removed, even though the design is amended to reduce impact, the next stage is offsetting for the impact that is caused. • Offsetting would relate to the four identified functions of peat: climate change, water, archaeology, biodiversity. 	<ul style="list-style-type: none"> • Evidence base required to assess and justify monetary value of peat. • Viability of such a scheme is a consideration. • Removal of peat can be necessary for conservation management e.g. the most biodiverse areas of fen occur on turf stripped areas. • Would need schemes to offset loss of peat and as peat is a finite resource and landowners willing to

Options	Potential Content	Issues to Consider
	<ul style="list-style-type: none"> Would reflect a monetary value of the impact of a loss of peat and could involve a monetary contribution to manage peat elsewhere better as mitigation/compensation. 	<ul style="list-style-type: none"> raise water levels to create new areas of peat are limited finding local schemes could be challenging. Schemes to create new areas of peat could be very expensive with long term land use change and water control possibly required. Planning obligation pooling restrictions could be of importance.
Option 6: A policy which protects peat and restricts development on peat	<ul style="list-style-type: none"> Development on peat unacceptable if it requires groundworks and/or alters its quality/operations e.g. introduction of polluted water / restricts water flow Proposals to enhance peat and protect its qualities will be supported. 	<ul style="list-style-type: none"> Likely to not be seen as compliant with the NPPF in terms of economic development and therefore unlikely to be found sound. Would meet the climate change and carbon emission aspects of the NPPF. Could make boating related development difficult which could prove unpopular locally and have economic impacts on businesses. Removal of peat can be necessary for conservation management e.g. the most biodiverse areas of fen occur on turf stripped areas Would protect peat in the Broads.

12.3 Evidence that has informed this section

NCA Profile: 80 The Broads (NE449), Natural England.	http://publications.naturalengland.org.uk/publication/11549064
Positive Carbon Management of Peat Soils, Broads Authority.	http://www.broads-authority.gov.uk/_data/assets/pdf_file/0010/416494/BA_PeatCarbonManagement.pdf
Peatlands and Climate Change Worrall et al, Scientific Review December 2010	http://www.iucn-uk-peatlandprogramme.org/sites/www.iucn-uk-peatlandprogramme.org/files/Review%20Peatlands%20and%20Climate%20Change,%20June%202011%20Final.pdf
NORFOLK BIODIVERSITY ACTION PLAN – Fen Orchid (Norfolk Wildlife Trust)	http://www.norfolkbiodiversity.org/pdf/SAPsHAPs/SAPs/27fen%20orchid-april%202004.pdf
FEN PLANT COMMUNITIES OF BROADLAND Results of a Comprehensive Survey 2005-2009 (Broads Authority and Natural England)	http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/416391/Fen-plant-report-summary.pdf
England's peatlands Carbon storage and greenhouse gases,	http://publications.naturalengland.org.uk/publication/30021?category=10003

Natural England, 2010.	
Wetland and Waterlogged Heritage Survey NHPP Activity 3A5, Historic England, 2011 to 2015.	http://historicengland.org.uk/research/research-results/activities/3a5
The Archaeology of the Broads: a review.	To be published.

12.4 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
DP1	Development Management	
DP5	Development Management	

13. Heritage and Historic Assets

13.1 Introduction

The Broads has a rich and varied cultural heritage recognised by the statutory protection or designation given to many assets in the Broads. The Broads has:

| **270** listed building | **25** conservation areas | **15** Scheduled Monuments | **1** Registered Park and Garden |

There are many other landmark buildings, structures, historic landscape or landscape features that contribute to local character and heritage but are not statutorily protected. The Broads Local List currently includes examples of the following Undesignated Heritage Assets¹⁷: Rail structures, World War I and II structures, Drainage Mills and Waterside Chalets. Each year the Broads Authority assesses other groups of interesting structures in the Broads for consideration for addition to the Local List. The Local List will grow and become more varied over time.

Much of the landscape of the Broads is a product of historic and cultural practices and is of itself an historic landscape, providing the context for individual sites of archaeological interest. Archaeological remains are a finite resource, often highly fragile and vulnerable to damage and destruction.

One of the statutory purposes of the Broads Authority is ‘*Conserving and enhancing the natural beauty, wildlife and **cultural heritage** of the Broads*’.

13.2 Non-Designated Heritage Assets and Local Listing

National Planning Policy Guidance identifies Non-Designated Heritage Assets as:

‘...monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as ‘locally listed’.’

Local built heritage listing is a means for a community and a local authority to jointly identify heritage assets that are valued as distinctive elements of the local historic environment and landscape. It provides clarity on the location of assets and what it is about them that is significant, guaranteeing that strategic local planning properly takes account of the desirability of their conservation. Locally listing a heritage asset does not bring additional consent requirements over and above those required for planning permission. It can, however, help to influence planning decisions in a way that conserves and enhances local character. The NPPF paragraph 135 says:

‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.

¹⁷ <http://www.broads-authority.gov.uk/planning/Other-planning-issues/protected-buildings/broads-local-list-of-heritage-assets>

The local list for the Broads is becoming larger and more varied and will continue to change. But it is not just those assets on the Local List that are of importance, there are other categories of assets. Non-designated heritage assets are:

- Those that are on the Local List
- The known knowns - those being assessed in the future (such as boatyards and staithes)
- The known unknowns and unknown unknowns – i.e. those assets that are discovered in the future that we either know about or do not know about. These may be identified in pre-application discussions.

The National Planning Policy Guidance¹⁸ says:

‘Local lists incorporated into Local Plans can be a positive way for the local planning authority to identify non-designated heritage assets against consistent criteria so as to improve the predictability of the potential for sustainable development’.

Issue 8: how do we give further weight to the Local List and undesignated heritage assets (that we know about and those that we do not know about)?

Options	Potential Content	Issues to Consider
Option 1: No policy	<ul style="list-style-type: none"> • No policy 	<ul style="list-style-type: none"> • Rely on the NPPF. • Does not address the unknowns.
Option 2: Policy approach that simply rolls DP5 forward.	<ul style="list-style-type: none"> • See DP5. 	<ul style="list-style-type: none"> • The NPPF provides a stronger stance than DP5. • Does not address the unknowns. • Internal assessment identified areas of the policy that need improving.
Option 3: A stronger policy on undesignated heritage assets.	<ul style="list-style-type: none"> • This would use DP5 as a basis and relate to elements of the NPPF. • The policy would address designated and undesignated assets. • Stronger wording would seek to protect assets. • Criteria relating to circumstances when harm or loss of a non – designated heritage asset will be considered would form part of the stronger policy. • The issue of the assets we know about, as well as those which we do not know about will be addressed in the policy as well. 	<ul style="list-style-type: none"> • Existing policy approach would be strengthened. • Would address the unknowns. • Would align with the NPPF. • Would better reflect the importance of heritage assets in the Broads. • Policy could reflect the local heritage assets and specific Broads related issues especially public benefits (referred to in the NPPF).

¹⁸ Paragraph: 041 Reference ID: 18a-041-20140306

13.3 Waterside Chalets

Waterside chalets in the Broads can be primary residences, second homes or holiday lets. They typically face the river with road and pedestrian access to the rear. Their form, design and size varies significantly around the Broads. Each has its own story. They are now considered an important aspect of the Broads; not only from a landscape viewpoint, but also from a visitor and community viewpoint.



Picture Dutch Touch: Dutch Touch Started life as a helter skelter on the end of Britannia Pier at Great Yarmouth. After a fire, what was left was transported by horse and cart to Potter Heigham. The bottom section is a holiday cottage and the top section used as a shed and outside toilet.

Waterside chalets were until recently, in the main, un-designated and seemed to be threatened by loss of character through incremental changes or through demolition and replacement. Even on a small scale the character of the chalets is under threat from changes such as the replacement of timber windows with plastic and even the replacement of thatched roofs with an alternative material.

In May 2015, 58 of the waterside chalets in the Broads became part of the Local List and are now considered as non-designated heritage assets¹⁹.

With some chalets being on the Local List, the existing policies of the Broads Local Plan, as well as the NPPF, combined with the potential Locally Listed Buildings and Structures policy, it is considered there are adequate policies that cover change to waterside chalets. A policy relating to waterside chalets is therefore not proposed.

There are existing guides relating to these buildings, but these were created in the 1990s and 2000s. The Authority is reviewing these guides to update and improve in order to provide advice to those wishing to improve or change their waterside chalets.

Q: Is having a guide and no specific policy an approach which you support?

¹⁹ <http://www.broads-authority.gov.uk/planning/Other-planning-issues/protected-buildings/broads-local-list-of-heritage-assets>

13.4 Drainage Mills

Drainage Mills are a defining feature of the cultural heritage of the Broads and significantly contribute to the landscape scene of the Broads, viewed from the land and from water. The mills vary in size and design but all had the fundamental purpose of draining water from the land to enable the fields to be grazed and then latterly to be used for other agricultural uses.

Redundancy, exposure to elements and vulnerability to vandalism mean a number of the mills are recorded locally as being 'at risk' and the Halvergate Marshes Conservation Area is currently the only Conservation Area in the Broads that is at risk and is included on Historic England's Heritage at Risk Register.

Picture Hardley Mill²⁰. This windmill²¹ was capable of raising twelve tons of water per minute via a twelve foot high vertical shaft, five feet in diameter. The mill was built in 1874. It operated until around 1950 when it was tail winded and badly damaged. It was abandoned by the Internal Drainage Board and, like most other drainage windmills, replaced by an electric drainage pump.



The mills are in varying conditions (according to the Drainage Mill Action Plan and Strategy, Broads Authority). Hardley Mill for example has been restored and now has cap, sails and a full working mechanism. Black Mill has a temporary cap on to make it weather-tight and protect the internal mechanism. Stone's Mill in Freethorpe is rated as being very fragile, vulnerable and highly at risk due to lack of maintenance since it became redundant.

Sites Specifics Policy XNS6 encourages the restoration of the mills. However, due to their isolated location, usually in areas at risk of flooding as well as the extent of works required to restore some of the mills, proposals for restoration are not easy to develop and can be costly.

The mills tend to be the largest and most obvious structures in the landscape which is very flat and open. The Broads Authority wants the mills to be restored or at the very least made safe now for future restoration. Although not the only way to enable this, consideration of the issue as part of the Local Plan could help restore the mills.

²⁰ http://www.broads-society.org.uk/?page_id=2330

²¹ http://www.hardley-windmill.org.uk/index_files/about.htm

Issue 9: how can the Local Plan help enable restoration of the drainage mills of the Broads?

Options	Potential Content	Issues to Consider
Option 1: No policy other than rolling forward XNS5 of the Sites Specifics Local Plan.	<ul style="list-style-type: none"> No Policy 	<ul style="list-style-type: none"> The current situation would continue, whereby the Authority encourages the maintenance, restoration and re-use of mills, but the difficulty in producing acceptable schemes either due to constraints or costs remains. Other structures that are equally locally important are not addressed through policy.
Option 2: An additional generic policy relating to restoring and re-use of heritage assets.	<ul style="list-style-type: none"> The policy would address alternative uses and how these could be considered if they benefit the structure. It is important that the policy does not 'reward' the lack of maintenance to such structures. The policy would include criteria to be addressed as part of any application for such structures. Careful wording of the policy is required to ensure that restoration and change to an asset is reasonable, can be delivered, and is justified and appropriate. 	<ul style="list-style-type: none"> Such a policy could enable the restoration of structures such as the mills. Such a policy could be seen as 'rewarding' owners for lack of maintenance to such structures. Would benefit different structures, not just the mills. Would mean that proposals would be assessed on a case by case basis. Such a policy could show that the Authority is willing to consider bespoke options for the restoration and use of mills and other structures. Historic England provides advice on the issue of enabling development.
Option 3: An additional policy or extra wording to XNS5 relating to 'enabling development' ²² of mills only.	<ul style="list-style-type: none"> The principle of such an approach is effectively allowing some related development to fund improvements to the mills. The related development could be something that is not necessarily normally accepted in planning terms due to the constraints in the area. Emphasise that building something next to a mill is not 	<ul style="list-style-type: none"> Such a policy could enable the restoration of heritage assets including mills. Enabling development should only be used in exceptional circumstances. Such a policy has the potential to normalise an approach that should only be the last resort. Could limit appetite of looking at less damaging ways of improving the structure. Historic England provides advice on

²² 'Enabling development' is development that would be unacceptable in planning terms but for the fact that it would bring public benefits sufficient to justify it being carried out, and which could not otherwise be achieved. While normally a last resort, it is an established and useful planning tool by which a community may be able to secure the long-term future of a place of heritage significance, and sometimes other public benefits, provided it is satisfied that the balance of public advantage lies in doing so.

Options	Potential Content	Issues to Consider
	necessarily enabling development.	the issue of enabling development.
Option 4: An additional policy relating to 'enabling development' of all heritage assets.	<ul style="list-style-type: none"> Would reflect the Historic England guidance. Historic England guidance refers to listed buildings. The potential policy would apply these principles to all heritage assets. 	<ul style="list-style-type: none"> Residential could be seen as the default type of enabling development in places not suitable for such a land use. The approach would be specific to the mills but does not address other structures. There is Historic England guidance on enabling development. Historic England has indicated that they would not likely support such a policy.
Option 5: An additional policy which allocates certain mills for development or change	<ul style="list-style-type: none"> A screening exercise would be completed to consider which mills are in most need of improvements. This could reflect historic significance, location and what is required to improve the mill. Mills are allocated using criteria based policies. A red line is drawn around the mill and potentially land associated with the mill. A range of options could be included in the policy, specific to that particular mill, which could not restrict opportunities for restoration. 	<ul style="list-style-type: none"> Such a policy could enable the restoration of mills. Such a policy could show that the Authority is willing to consider bespoke options for the restoration and use of mills. There could be a risk of inhibiting innovative solutions. Other solutions may become apparent over time which had not been considered when writing the policy. Specific to the mills but does not address other structures. Not all mills are likely to be allocated initially. Historic England advises against allocation of a structure as creating policy acceptance in one area could mean it becomes the norm elsewhere.

13.5 Archaeology

Archaeological remains are a finite resource, often highly fragile and vulnerable to damage and destruction. Compared to other wetland, or former wetland, areas of the East of England the archaeology of the Broads is comparatively under-investigated. Additionally, the lakes, dykes and in some cases the rivers in the Broads area are themselves archaeological features.

The main factors affecting the buried archaeology of the Broads are listed below. Viewed more positively, at least some of these threats provide opportunities for archaeological investigation and an increase in our understanding of the archaeology of the area.

- infill and commercial development;
- boat dyke/mooring extensions and the construction of wild-fowling ponds;

- groundworks associated with the Broads Flood Alleviation Project, which may protect historic buildings, but which may also adversely affect buried archaeology;
- changes in land use following the end of the ESA Scheme in 2014 and its replacement by Countryside Stewardship which is a scheme with different priorities and lower levels of funding) which may result in some ploughing on the marshland, with associated under-draining and dyke filling;
- changes in water quality, eutrophication, abstraction, input of saline water from tidal flooding, besides diffuse pollution from land management;
- seasonal variability in river flows;
- depleted groundwater resources;
- bank erosion;
- dredging and mud pumping, in line with maintaining navigation may have adverse effects
- nature conservation schemes including scrape development;
- offshore commercial development related to aggregate extraction and windfarm construction and underground cables;
- in the longer term, climate change and rising sea levels, and
- Construction/material movement which can compact or disrupt buried features.

Historic England has identified the Broads as an area of *exceptional waterlogged heritage*. Fundamentally, because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, for example the Clinker Boat found at Loddon.



Picture Loddon Clinker Boat²³. The date of the boat is not yet certain, but the shape of the boat along with the type of materials used and the construction techniques indicate a probable late medieval date (1400 to 1600). One artefact was recovered from within the boat; a knife of a type typically used during this period. This is an extremely rare and important find. The preservation of wooden artefacts requires very particular conditions. In this instance the waterlogged condition of the peat marsh has preserved the wooden boat.

The existing policies that refer to archaeology (CS5 and DP5) are set to be improved as discussed earlier in this section. Furthermore, Historic England is currently developing a Statement of Significance for the Broads as part of the National Heritage Protection Plan. Consequently, no *new* policy is proposed but the existing policies will be improved to reflect the identification of the Broads as an area of exceptional waterlogged heritage.

²³ http://www.bfap.org/ARCH_boat_find_Chert_page.html

Of relevance is the [Peat section](#) of this document.

Q: Do you have any thoughts on this approach?

13.6 Heritage and Cultural Interpretation

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

The NPPF says:

126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment (inter alia)

- *opportunities to draw on the contribution made by the historic environment to the character of a place.*

141. Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Issue 10: how can the Local Plan address interpretation of the historic environment and culture in the Broads?

Options	Potential Content	Issues to Consider
Option 1: No policy	-	<ul style="list-style-type: none"> • Rely on discussions through the planning application process only. •
Option 2: Policy or criteria that relates to interpretation of the historic and cultural environment.	<ul style="list-style-type: none"> • Would relate to development or change of historic or cultural asset and or site. • Could require a heritage interpretation Statement that discusses how the site will be interpreted. This could be as part of (a section of) a Heritage statement. If so then would only come into play when heritage either designated or undesignated triggered the need to submit a Heritage Statement with a Planning Application. 	<ul style="list-style-type: none"> • Would promote the recognition of the importance of the historic environment through heritage interpretation measures. • Could be seen as onerous to some applicants. • Could require a threshold in terms of level of significance. • Does not necessarily need to increase any financial burden as this will depend on the most appropriate way of interpreting the site. • Would ensure that the site's

Options	Potential Content	Issues to Consider
		<p>heritage and culture is remembered in an overt way.</p> <ul style="list-style-type: none"> Would meet one of the statutory purposes of the Broads Authority: <i>'Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public'</i>
Option 3: Guidance to heritage and cultural interpretation.	<ul style="list-style-type: none"> Content would improve understanding of the asset and or site as well as assisting developers in determining the most appropriate and proportionate way of addressing interpretation. 	

13.7 Evidence that has informed this section

Local List, Broads Authority.	http://www.broads-authority.gov.uk/planning/Other-planning-issues/protected-buildings/broads-local-list-of-heritage-assets
Good Practice Guide for Local Heritage Listing, Historic England.	https://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/
Historic Waterside Chalets of The Broads, Kayleigh Wood.	Not on line.
Enabling development and the conservation of significant places, Historic England.	http://www.historicengland.org.uk/images-books/publications/enabling-development-and-the-conservation-of-significant-places/
Drainage Mill Action Plan and Strategy, Broads Authority.	http://www.broads-authority.gov.uk/data/assets/pdf_file/0007/421855/EB5.pdf
Water, Mills and Marshes: the Broads Landscape Partnership. Application to the Heritage Lottery Fund, Landscape Partnership Scheme, May 2015.	http://www.broads-authority.gov.uk/looking-after/projects/water,-mills-and-marshes
Historic Environment Record	http://www.heritagegateway.org.uk/Gateway/CHR/
HISTORIC ENVIRONMENT GOOD PRACTICE ADVICE IN PLANNING, Historic England. Notes 1, 2 and 3.	http://historicengland.org.uk/images-books/publications/pps-practice-guide/
The Archaeology of the Broads: a review.	Not on line.
NHPP 3A5 IDENTIFICATION OF WETLAND/ WATERLOGGED SITES. 6240 Exceptional Waterlogged Heritage. Stage 1: Inventory	http://content.historicengland.org.uk/images-books/publications/6240-exceptional-waterlogged-heritage-stage1-inventory/6240-stage1-web-report-v2.pdf/
The Archaeology of Norfolk Broads Zones	http://www.heritage.norfolk.gov.uk/nmp

13.8 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS5	Core Strategy	
CS6	Core Strategy	
DP5	Development Management	
DP6	Development Management	
DP21	Development Management	
POT2	Sites Specifics	
XNS5	Sites Specifics	

14. Biodiversity

14.1 Introduction

The Broads is one of Europe's most important wetlands for biodiversity and nature conservation. Essentially it is a predominantly freshwater ecosystem made up of meandering rivers interconnecting expanses of shallow water - the broads themselves, extensive grazing marshes, fens, reedbed and wet woodland, a short coastal strip at Winterton – Horsey Gap and relict estuary at Breydon Water. The Broads National Park supports 11,000 species of which over 1,500 are priorities for conservation. The Fen Raft Spider is one of 66 species that depend on the Broads almost entirely for their survival in the UK.

The surrounding habitats include botanically rich fens, home to many rare invertebrates including swallowtail butterfly, Norfolk hawker dragonfly and birds including the bittern and crane. Wet woodlands, full of bird and invertebrate life, and grazing marshes with their unique aquatic plant and animal communities, make the Broads one of the most wildlife-rich areas in the family of national parks.

This fragile landscape has come under increasing pressure from a variety of sources in the last century including habitat loss and fragmentation, pollution of waterways, water abstraction and increasing threats from non-native species. Rising sea levels and drought associated with climate change also threatens species and habitats.

The NPPF says:

109. *'The planning system should contribute to and enhance the natural and local environment by:*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'*
114. *'Local planning authorities should:*
- *set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'*

14.2 Biodiversity enhancements guide

Developments need to consider and provide for biodiversity. Such provisions on a small scale can include bat bricks, bird boxes or wildlife ponds. These features are low cost ways of providing for biodiversity in the Broads as part of smaller schemes. The NPPF says:

18. *'When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles (inter alia):*
- *opportunities to incorporate biodiversity in and around developments should be encouraged'*

To enable early consideration when designing schemes and to assist in delivery of such features, we are working on a Biodiversity Enhancement Guide. It is intended to consult and adopt the guide in 2016.

14.3 Giving non-designated sites recognition – local sites

The Broads Authority is considering identifying sites that are of local interest for wildlife, similar to the local process for identifying heritage sites. Such sites are not part of the designated site network but may provide habitat corridors, buffers to arable land and will support species that are unable to exist in developed or intensive agricultural land. We would like to explore recognising such sites through the planning system.

Issue 11: how can we give non-designated sites recognition?

Options	Potential Content	Issues to Consider
Option 1: No policy	<ul style="list-style-type: none"> No policy 	<ul style="list-style-type: none"> Such sites are not given recognition in the planning system.
Option 2: Allocate sites for recognition	<ul style="list-style-type: none"> Highlight on a map, the sites of local interest. Identify features on the land that are of particular merit. Seek to ensure that proposals near to or on these sites fully understand the benefits the site provides to flora and fauna. Seek to ensure particular features are enhanced and retained. 	<ul style="list-style-type: none"> Whilst this may seek to elevate the importance of such sites, they will not have the protection afforded sites further up the network of sites.

14.4 Brownfield sites

Brownfield sites can be havens for wildlife, supporting some of the UK's most threatened species. Brownfield sites are any piece of land which has been altered by human activity. These can be extremely varied, including anything from former industrial estates to quarries, spoil heaps or disused railway. Brownfield sites are now listed as a Priority Habitat in Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act) under the name of 'Open mosaic habitat on previously developed land'. Open mosaic habitat on brownfield sites can be extremely diverse, supporting a wide range of terrestrial and aquatic habitats.

The NPPF says:

111. 'Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.'

The NPPG expands on this by saying:

'This means that planning needs to take account of issues such as the biodiversity value which may be present on a brownfield site before decisions are taken.'

The Wildlife and Countryside Link discuss what 'high environmental value' means:

'A site should be considered of 'high environmental value' in biodiversity terms if:

- It contains priority habitat(s) listed under section 41 Natural Environment and Rural Communities Act 2006
- The site holds a nature conservation designation such as Site of Special Scientific Interest, or is defined as a Local Wildlife Site (or equivalent) in local planning policy.'

Issue 12: how can we protect habitats and species on brownfield sites?

Options	Potential Content	Issues to Consider
1: No policy	<ul style="list-style-type: none"> No policy 	<ul style="list-style-type: none"> Rely on the NPPF and the Wildlife and Countryside Link guidance relating to 'High Environmental Value'.
2: Criteria based policy	<ul style="list-style-type: none"> Could be incorporated into policy DP1. Policy likely to require relevant species surveys to be undertaken (for example invertebrate or detailed bird surveys). Assessment of sites to determine if they are open mosaic habitat on previously developed land. Assessment to determine if the sites are of 'High Environmental Value'. Could require scheme design to protect and enhance areas of high environmental value and design appropriate compensation and off site mitigation measures. 	<ul style="list-style-type: none"> Elevates importance of habitats on brownfield land. Development in the Broads is likely to see the use of brownfield land. This is not about preventing development on brownfield land, but it is about ensuring development considers the potential habitat and taking this into consideration in its design and delivery. Viability is a consideration. Could consider a size threshold although small sites can have high ecological value. This is not at the expense of other habitats. This recognises that the majority of development in the Broads tends to occur on brownfield land.

14.5 Norfolk Recreation Impact Study

Underway at the time of writing, the Norfolk Recreation Impact Study seeks to understand the behaviour of visitors to protected sites in Norfolk. Surveyors at set points, usually near car parks, ask a series of questions to determine length of stay, route, and reason for visiting, activity and knowledge of the designation of the site. Surveys are being undertaken at various times through the year to reflect the season important to a particular site. The work, jointly commissioned by all Norfolk Local Planning Authorities, will seek to inform the Habitats Regulation Assessment process required to assess Local Plans. The Authority awaits the final report (due summer 2016) which could inform the Preferred Options version of the Local Plan.

14.6 If a developer cannot avoid or mitigate for significant harm to biodiversity on site

The NPPF require development to contribute to the '*Government's commitment to halt the overall decline in biodiversity*' (paragraph 109). It says that planning policies should '*promote the preservation, restoration and re-creation of priority habitats*' (paragraph 117)

The full package of mitigation/compensation measures required to fully offset any biodiversity impact of a development needs to be agreed at the time the planning application is being considered. Where possible the mitigation should take place on site.

The NPPF further sets out the process of considering a scheme that has impacts on biodiversity at paragraph 118:

When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- *if significant harm resulting from a development cannot be **avoided** (through locating on an alternative site with less harmful impacts), adequately **mitigated**, or, as a last resort, **compensated** for, then planning permission should be refused*

There is scope to compensate for residual adverse biodiversity impacts arising from a development after mitigation measures have been taken.

Issue 13: how can we compensate for residual adverse biodiversity impacts arising from a development after mitigation measures have been taken?

Options	Potential Content	Issues to Consider
Option 1: No policy	<ul style="list-style-type: none"> • No policy 	<ul style="list-style-type: none"> • Rely on the NPPF and negotiations at planning application stage.
Option 2: Compensation policy	<ul style="list-style-type: none"> • All development unable to mitigate its impact within development boundary, provides one off payment to the Broads Authority to undertake biodiversity enhancement projects in the Broads. 	<ul style="list-style-type: none"> • Value depends on scheme details. • Likely to require local work to determine scale and thresholds. • Viability a consideration. • S106 pooling restrictions. • Would need to identify particular projects. • Independent panel to ensure money spent appropriately. • Would need to be simple to operate with minimal administration burden. • Where there is high ecological value on a site but there might only be one dwelling being constructed this approach could not work. • Large schemes could be discussed on case by case basis using policy thrust. • Likely need some guidance regarding application of the policy.

14.7 Evidence that has informed this section

Open mosaic habitats high value guidance: when is brownfield land of 'high environmental value'? (Wildlife and Countryside Link)	http://www.wcl.org.uk/docs/Brownfield%20high%20environmental%20value%20FINAL%20June%2015.pdf
Identifying Open Mosaic Habitat (Buglife)	https://www.buglife.org.uk/sites/default/files/Identifying%20open%20mosaic%20habitat.pdf
Introduction to Brownfields. (Buglife)	https://www.buglife.org.uk/sites/default/files/Introduction%20to%20brownfields_0.pdf

14.8 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS1	Core Strategy	
CS2	Core Strategy	
CS4	Core Strategy	
DP1	Development Management	
DP2	Development Management	
Biodiversity a consideration in many Site Specifics policies.		

15 Renewable Energy

15.1 Renewable Energy Potential in the Broads

The NPPG says that:

'When drawing up a Local Plan local planning authorities should first consider what the local potential is for renewable and low carbon energy generation.'

The Broads Authority commissioned a study to review renewable energy solutions in the Broads (Hickey, 2013). The study concluded that:

'The most efficient and immediate solution for renewable energy generation in the Broads is a combination of GSHP (Ground Source Heat Pumps), ASHP (Air Source Heat Pumps), SG (Solar Greenhouses) and AD-CHP (Anaerobic Digestion Combined Heat and Power). SG or integrated amorphous technology (thin film a-Si) or Solar Slates offer the best form of domestic electricity generation taking the aesthetic constraints of the Broads into consideration.'

We intend to update this study in 2016/17 to take account of the requirements as set out in the NPPG, advances in battery storage capacity, solar slate techniques as well as ensuring the study addresses water source heat pumps.

15.2 Wind Energy

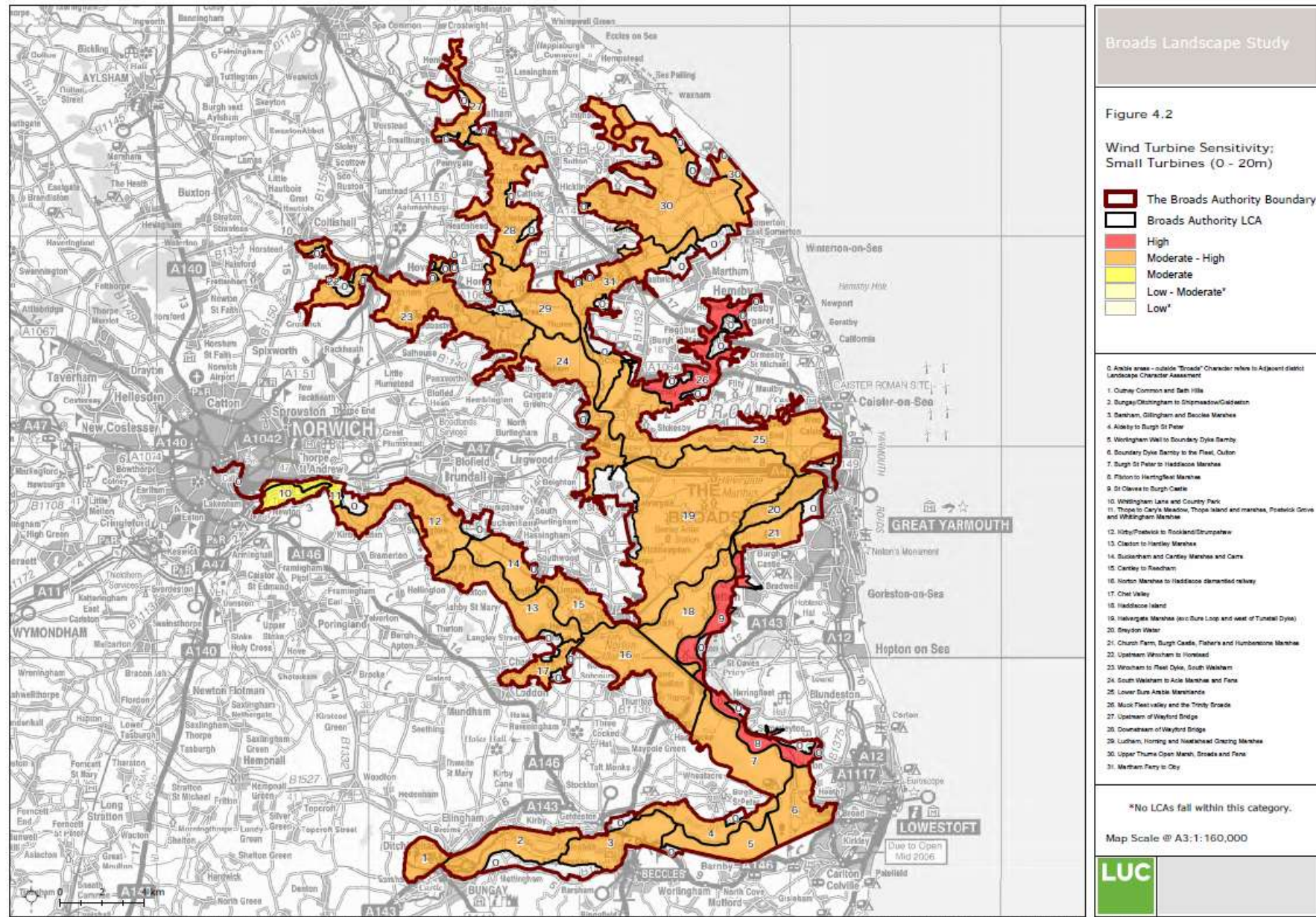
The NPPG says:

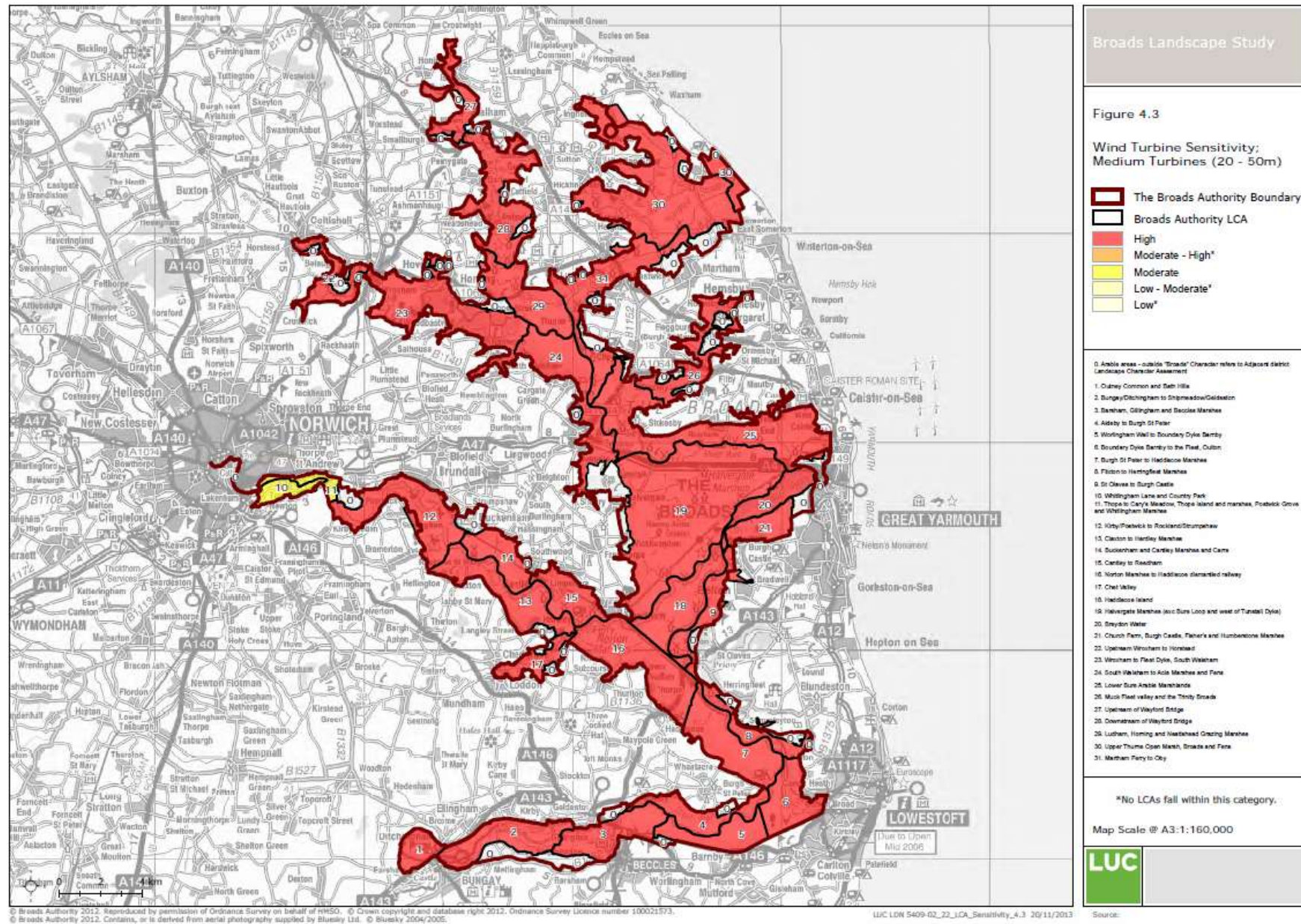
'The Written Ministerial Statement made on 18 June 2015 is quite clear that when considering applications for wind energy development, local planning authorities should (subject to the transitional arrangement) only grant planning permission if:

- *the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and*
 - *following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.*
- Whether the proposal has the backing of the affected local community is a planning judgement for the local planning authority.'*

The Broads Authority has a Landscape Sensitivity Study relating to wind power (and solar farms) (2012). This study has identified the sensitivity of the Broads landscape to wind turbines and provides guidance for new development within the Broads Authority Executive Area and also on land outside of the Broads, in neighbouring districts which might impact on the setting of the Broads. Further details are provided below, but in essence the study concludes that few areas will easily accommodate large turbines.

It is landscape areas 10 and 11 of the Landscape Sensitivity Study that are assessed as having moderate sensitivity to small and medium single turbines in the Broads Executive Area (see following maps). All other areas are moderate to high or high sensitivity. Definitions from the Broads Landscape Sensitivity Study are shown in the following table.





Sensitivity Level	Definition
High	The key characteristics and qualities of the landscape are highly sensitive to change from the type and scale of renewable energy being assessed.
Moderate – High	The key characteristics and qualities of the landscape are sensitive to change from the type and scale of renewable energy being assessed.
Moderate	Some of the key characteristics and qualities of the landscape are sensitive to change from the type and scale of renewable energy being assessed.
Low – Moderate	Few of the key characteristics and qualities of the landscape are sensitive to change from the type and scale of renewable energy being assessed
Low	Key characteristics and qualities of the landscape are robust and are less likely to be adversely affected by the type and scale of renewable energy development being assessed

The Landscape Sensitivity Study defines turbine size as

- small turbines - 0-20m height
- medium turbines - 20-50m height

The rensmart website²⁴ gives an indication of wind speed. Windspeeds for the Whitlingham area (areas 10 and 11 of the Landscape Sensitivity Study) are set out in the table below. As an indication, some companies use 5 m/s as a minimum for considering projects.

Height Above Ground	Wind Speed
At 10 metres	4.9 m/s 11 mph
At 25 metres	5.6 m/s 12.5 mph

As well as wind speed, it is important to note that a site's suitability for wind turbines reflects the specifics of the site (for example a tree to the south west of the site is likely to impact efficient energy generation) as well as the economics (for example the announcement in July 2015 that the Government intends to cease onshore windfarm subsidies).

Because of the conclusions of the Landscape Sensitivity Study showing that small and medium wind turbines would have at least a moderate effect on the Broads landscape sensitivity, **the Authority considers allocating land within the Broads Authority Executive Area is not appropriate.**

Q: Do you have any thoughts on our position on this matter?

15.3 Evidence that has informed this section

Broads Landscape Sensitivity Study (2012)	http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-sensitivity-studies
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²⁴ <http://www.rensmart.com/Weather/BERR>

15.4 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS8	Core Strategy	
DP2	Development Management	
DP7	Development Management	
DP8	Development Management	
DP17	Development Management	

16 Landscape Character

16.1 Introduction

The Broads is renowned as one of Europe's finest and most important wetlands, a delicately balanced mosaic of interconnected habitats that gives the area its biological richness and high conservation value. Comprising level, open marshland and valleys drained by three principal rivers - the Bure, Yare and Waveney - and their tributaries, the Thurne, Ant, Wensum and Chet, the Broads is a living and working cultural landscape influenced over time by patterns of human existence.

The Broads landscape faces a number of challenges from changes in the economy, population growth and mobility, agriculture and land use, technology, governance and, significantly, from the impacts of sea level rise and climate change.

The first statutory purpose of the Broads Authority is that of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads.

Through understanding how places differ we can also ensure that future development is well situated, sensitive to its location, and contributes to environmental, social and economic objectives. The NPPF says:

'109. The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;'*

'114. Local planning authorities should:

- maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast.'*

'115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.'

16.2 The European Landscape Convention (ELC)

The European Landscape Convention (ELC) is the first international convention to focus specifically on landscape, and is dedicated exclusively to the protection, management and planning of all landscapes in Europe. The ELC became binding from 1 March 2007. The convention highlights the need to recognise landscape in law. It seeks to influence rather than direct individual states to develop landscape policies dedicated to the protection, management and creation of landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. It also encourages the integration of landscape into all relevant areas of policy, including cultural, economic and social policies. Raising awareness of the landscape is an important thread running through all these measures.

The convention:

- a) promotes the importance of landscape, not as just scenery or a backdrop, but because it links culture with nature, and past with present;
- b) promotes its many values not all of them tangible; it matters to, and is valued by, people and provides a context for people's lives;

- c) emphasises the consideration of the whole landscape not just the 'best bits' and applies to all landscapes everywhere and in any condition – land, inland water, inter-tidal, marine, natural, rural, urban and peri-urban, outstanding, ordinary and degraded; and
- d) encourages a forward looking approach, and recognition of the dynamic nature of landscape – with an emphasis on management of change and creating new landscapes as well as managing the landscapes that we inherit.

16.3 Landscape Character Assessment (2006 and 2012)

The study concentrated on identifying a series of areas each with a unique set of characteristics, which combine to give them their own distinct sense of place. Thirty one character areas have been identified and the assessment looked into an area's remoteness and tranquillity, scale, pattern, skylines, visibility, accessibility, recreation and the experience of being in the area.

The LCA also identified generic landscape character types:

- Relict estuary
- Coastal strip
- Estuarine marshland
- Peat 'fen' areas
- Upper river valley and marshes
- Broad's
- Carr woodland
- Heathland
- Upland (non-wetland)
- Settlement
- Settlement fringe
- Industrial and
- Post-industrial – disturbed or made up ground

There is potential to produce guidance to assist in interpreting the LCA for certain areas around the Broad's. These could highlight specific landscape and design considerations for all types of development.

Q: Do you have any thoughts how the LCA could be interpreted to aid the planning application process?

16.4 Landscape Partnership Bid – Water, Mills and Marshes

The HLF Landscape Partnership Scheme is for projects led by partnerships of local, regional and national interests which aim to conserve areas of distinctive landscape character throughout the UK. A bid to the Heritage Lottery Fund (HLF) Landscape Partnership Scheme for £2.6m was successful in late October 2015 and with match funding the project will total around £4.5m.

Water, Mills and Marshes will work to further conserve and enhance, interpret and make more accessible the built and natural heritage and cultural landscape of the area between Norwich, Great Yarmouth, Lowestoft, Acle and Loddon following the course of the rivers Yare, Bure and Waveney. A total of 38 projects will now be developed over the next 18 months for delivery over a five-year period.

16.5 Land-Raising

This is whereby land or buildings are raised above the existing level, usually to reduce the risk of the site flooding, although results are not guaranteed. Dredging or material resulting from a new mooring basin for example may be disposed on a site and the land raised. Such land management to maintain land levels is a historic practice in the Broad's. However the impact of land-raising can see changes to the nature of habitats

that might exist on that site or nearby. There will also be a visual effect where a property is at a higher level than its neighbours. Such change could also make flood risk worse elsewhere. Of relevance to this topic is the section on peat.

Issue 14: how should we consider land-raising in the new Local Plan?

Options	Potential Content	Issues to Consider
Option 1: No Policy.	<ul style="list-style-type: none"> No specific policy. 	<ul style="list-style-type: none"> Accept that this happens. Would not address issues such as flood risk elsewhere and the visual impact. May provide a receptor for dredgings.
Option 2: Criteria based policy.	<ul style="list-style-type: none"> Criteria relating to location and scale as well as specifics of the site. Would include aspects such as tidal range of river. Would need to address impacts on landscape character and effects to the local habitat. Would require developer to justify land-raising. Would require developer to consider other options to address the issue land raising is to resolve. Would set out the information required to enable the Authority to fully assess the proposal. 	<ul style="list-style-type: none"> Provides a flexible approach with the sites on a case by case basis. Could still see land raising used if appropriate. Positive re-use of a local material such as dredging. Incremental changes to the local character of the area could result. Developer could use another way of addressing the problem other than land-raising. Land-raising will not automatically be accepted as a solution.
Option 3: Do not allow land-raising.	<ul style="list-style-type: none"> Policy approach does not allow raising of land. 	<ul style="list-style-type: none"> Restrictive policy. Not flexible. Does not acknowledge climate change and water level issues. By not raising the land, the landscape character and habitat are not affected immediately by land raising. The Broads has a history of maintaining land levels.

16.6 Disposal of excavated material

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

These developments can lead to materials which need to be accommodated somewhere on site or taken off site. The disposal of spoil/material is often an oversight by developers or on occasion there are presumptions of how to dispose of this material which may not be acceptable for the area.

Of importance to disposal of material is the section on peat, the section on archaeology as well as the guides referred to earlier in this section.

Issue 15: how should we consider disposing of excavated material in the new Local Plan?

Options	Potential Content	Issues to Consider
Option 1: No Policy	<ul style="list-style-type: none"> No specific policy. 	<ul style="list-style-type: none"> Leave for discussions as part of planning applications. Disposal of material could not be planned.
Option 2: Policy relating to excavated material.	<ul style="list-style-type: none"> Policy requests information relating to volume, plan for disposal, what options have been considered and justification for proposed approach. Can also signpost to the Environment Agency if over a certain volume in order to get waste licence. If keep on site, detailed plans required. 	<ul style="list-style-type: none"> Linked with land-raising section. Would ensure that disposal is considered earlier in the scheme design process and could be incorporated positively. Could result in improved disposal of material with landscape character and habitat benefits.

16.7 Landscape Character versus Landscaping

There can sometimes be confusion between these two terms.

- Landscaping is part of the design response to mitigate and/or enhance a proposal.
- Landscape means an area as perceived by people, whose character is the result of the action and interaction of natural and/or human factors (definition from the European Landscape Convention).

The Authority will seek to ensure our policies are clear with regards to landscaping and/or landscape character as we produce later versions of the Local Plan.

Some types and forms of hard (paving) or soft landscaping (planting) can have biodiversity, amenity and recreation benefits and are more appropriate in the Broads Executive Area than others. What is suitable on a site would reflect the location.

Issue 16: how should we address landscaping design in the new Local Plan?

Options	Potential Content	Issues to Consider
Option 1: No Policy	<ul style="list-style-type: none"> No specific policy. 	<ul style="list-style-type: none"> The issue of landscaping is not addressed in detail. Rely on discussions at planning application stage or rely on conditions.

Options	Potential Content	Issues to Consider
Option 2: Landscaping policy	<ul style="list-style-type: none"> Addresses preferred principles for landscaping. 	<ul style="list-style-type: none"> Would help clarify difference between landscape character and landscaping. Could result in appropriate landscaping and incorporation early in the design process. Enhancement would need to be appropriate.
Option 3: A guide	<ul style="list-style-type: none"> The guide could prescribe landscaping that is considered by the Authority to be appropriate to the area. Could reflect types of locations. 	<ul style="list-style-type: none"> Could result in appropriate landscaping.

16.8 Overhead lines

The Broads has benefitted from an agreement with OFGEM (regulates the electricity and gas markets in Great Britain) which allows EDF Energy (provides home and business energy in the UK) to remove overhead power lines in areas of outstanding natural beauty and national parks. Most recently, in 2014, three pylons were removed from the Barsham and Beccles area where the underground cables now pass underneath the river. OFGEM accept bids for funding to cover the cost of such grounding schemes. In a landscape like the Broads, such pylons and cables are very dominant on the skyline thus impacting the landscape character of the area.

Overhead telephone lines can also impact the landscape. There is not a similar initiative for undergrounding of overhead telephone cables.

Issue 17: how should we address overhead lines in the new Local Plan?

Options	Potential Content	Issues to Consider
Option 1: No Policy	<ul style="list-style-type: none"> No specific policy. 	<ul style="list-style-type: none"> Rely on discussions as part of planning applications.
Option 2: Policy relating to overhead lines and cables.	<ul style="list-style-type: none"> Seek no additional above ground cables or pylons in the Broads Executive Area. New developments, if feasible, could seek to underground some cables. 	<ul style="list-style-type: none"> Would set out a clear statement by the Broads Authority. Could result in no new electricity or telephone cables over the Broads. Some developments are covered by Permitted Development Rights so a policy is not often needed.
Option 3: An agreement or protocol.	<ul style="list-style-type: none"> Produced in liaison with OFGEM. Would relate to safeguarding the Broads from new cables in the future. 	

16.9 Settlement Fringe

There are always greater pressures and forces for change on land adjacent to settlements within the Broads than in the open countryside. Examples include the development of grazing marsh near Beccles for playing fields and the development of allotment and horsiculture for example at Oulton marshes. In the case of Oulton marshes, the pressure has resulted in an Article 4 direction²⁵. Article 4 directions are made when the character of an area of acknowledged importance would be threatened.

Settlement fringe is identified through the Landscape Character Assessment process as a landscape type and is defined as *'A type of land use found repeatedly throughout the Broads. Occurs where grazing land and settlement converge. Represents continued pressure on the grazing land through annexing, subdivision and mixed uses such as horsiculture, garden extension, allotments, chicken keeping, sports pitches, storage of scrap items e.g. caravans and redundant machinery. Identified through the Historic Landscape Characterisation Project as '20th Century Enclosures'.'*

Issue 18: how should we consider settlement fringe in the new Local Plan?

Options	Potential Content	Issues to Consider
Option 1: No Policy.	<ul style="list-style-type: none"> No specific policy. 	<ul style="list-style-type: none"> There is likely to be continued pressures of development in these areas. Could address this through more article 4 directions in the Broads Authority Executive Area.
Option 2: Criteria based policy.	<ul style="list-style-type: none"> Would assess schemes on a case by case basis. Would need to consider location, landscape impact, biodiversity archaeological, heritage and geodiversity impact. Siting and design would be an important consideration. 	<ul style="list-style-type: none"> Could be restrictive towards some development in some areas. Could see appropriately designed and screened development. Landscape enhancements could result from a scheme.
Option 3: Site specific policy.	<ul style="list-style-type: none"> Assess the Broads for areas where the most pressure from development on the Settlement Fringe could occur. Could provide design criteria appropriate for particular locations. Emphasise specific landscape , biodiversity archaeological, heritage and geodiversity issues 	

²⁵ A Notice under Section 4 of the Town and Country Planning Act 1990 is commonly known as an **Article 4 Direction**. Section 4 removes permitted development rights in a specific geographical area, and requires planning permission for all new development and any renovations to existing buildings.

Options	Potential Content	Issues to Consider
	for particular areas.	

At the time of writing, Waveney and Great Yarmouth Councils, supported by the Broads Authority, has commissioned work relating to the landscape sensitivity and capacity of urban fringe land located around key settlements within Great Yarmouth Borough and Waveney District. The aim is to provide a detailed understanding of the landscapes surrounding existing settlements and their capacity to accommodate future growth through evidence based approach using a systematic and widely accepted methodology. The Broads Local Plan will reflect any relevant findings of this work as it is progressed.

16.10 Evidence that has informed this section

Broads Landscape Character Assessment.	http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-character-assessments
Broads Landscape Sensitivity Study	http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-sensitivity-studies
NCA Profile: 80 The Broads (NE449)	http://publications.naturalengland.org.uk/publication/11549064

16.11 Adopted Policies Relevant to this Chapter

Mentioned through the Core strategy, Development Management DPD and Sites Specifics Local Plan, especially DP2, CS1, CS4.

17 Amenity and Tranquillity

17.1 Introduction

Amenity and Tranquillity are considered together in this document because they can include many similar perceptual factors, such as the impact of noise and light. Fundamentally, both are about how people perceive the impact of development on themselves.

In terms of amenity, protecting the amenity of both the future occupiers of new development and the occupiers of existing developments or uses of adjoining land or facilities is vital for the sustainability of communities in the Broads. For tranquillity, freedom from man-made noise and visual disturbance and a sense of wilderness is a key characteristic of the Broads.

17.2 Amenity

The NPPF says, at Paragraph 17:

‘...always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings’

We intend to roll forward our existing policy. This could be combined with a policy on tranquillity.

**Q: Do you have any
thoughts on existing policy DP28?**

17.3 Tranquillity

The most basic way of describing ‘tranquillity’ is ‘*getting away from it all*’. The elements of tranquillity include the perception of a lack of noise, low or no levels of light pollution and low or no impacts from built development. Please note that we tackle light pollution in detail in the next chapter.

The Campaign for the Protection of Rural England (CPRE) suggests tranquillity as:

“... the quality of calm experienced in places with mainly natural features and activities, and the absence of disturbance from manmade ones.”

A sense of tranquillity and wildness is integral to the distinctiveness of the Broads landscape character. Tranquillity mapping by the Campaign to Protect Rural England (CPRE) places most of the Broads at the ‘most tranquil’ end of the spectrum. Having said that, it is recognised that in some areas where there is a concentration of holiday or leisure development, tranquillity and wildness is not achievable and it is the bustling activity that gives the area its character, although this varies seasonally.

The NPPF at paragraph 123 says:

‘Planning policies and decisions should aim to:

- *identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.’*

We already seek to protect the most tranquil areas of the Broads through adopted policies in the Sites Specifics. Policies XNS1, XNS2 and XNS3 relate to the Upper Thurne, Trinity Broads and coastal area of the Broads Authority Executive Area, ensuring these areas can be used for quiet recreation.

Q: Are there any other areas in the Broads that you think are tranquil or offer quiet recreation which should be specifically protected?

Please let us know where these areas are and what makes you think they are tranquil and areas where people can 'get away from it all'. If you have a nomination, please fill out the form at [Appendix G](#).

Issue 19: how should we address tranquillity?

Options	Potential Content	Issues to Consider
Option 1: Roll forward policies XNS1, 2 and 3 only.	<ul style="list-style-type: none"> Similar content as current. 	<ul style="list-style-type: none"> Compliant with NPPF Protects these areas of the Broads for quiet recreation.
Option 2: Assess other areas of the Broads for consideration as tranquil areas.	<ul style="list-style-type: none"> Similar in content to XNS1, 2 and 3. 	<ul style="list-style-type: none"> Nominations from the public. Assessed using set criteria. Could protect the tranquillity of other areas of the Broads. Potential to lead to concentration of development in other areas. Could benefit wildlife as well.
Option 3: Have a strategic policy on tranquillity	<ul style="list-style-type: none"> Criteria based policy. Relating to the various elements of tranquillity. Support measures to enhance tranquillity. 	<ul style="list-style-type: none"> Some areas of the Broads are known for their hustle and bustle and this informs their particular character. A one size fits all strategic policy might not be appropriate. Policy could be very similar to the amenity policy. How can tranquillity be quantified and qualified? Would seek to protect the tranquillity of the Broads. Potential to lead to concentration of development in other areas. Could benefit wildlife as well.

17.4 Evidence that has informed this section

CPRE Tranquillity Maps.	http://maps.cpre.org.uk/tranquillity_map.html?lon=1.49527&lat=52.62241&zoom=10
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17.5 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF Compliant?
CS1	Core Strategy	
DP28	Development Management	
XNS1	Sites Specifics	
XNS2	Sites Specifics	
XNS3	Sites Specifics	

18 Light Pollution

18.1 The issue

No or low levels of light pollution are an important aspect of tranquillity. Light pollution comes in many forms, including sky glow, light trespass, glare, and over illumination:

- **Sky glow** is a product of light being scattered by water droplets or particles in the air.
- **Light trespass** occurs when unwanted artificial light illuminates an area that would otherwise be dark.
- **Glare** is created by light that shines horizontally.
- **Over illumination** refers to the use of artificial light beyond what is required for a specific activity.

It is important to note that artificial lighting is not detrimental in all cases. It has helped society by extending the length of the productive day for example. Indeed, the 'solution' to the issue is not necessarily turning off all lighting; artificial lighting does not necessarily produce light pollution. Light pollution is the term for artificial light that is excessive or intrudes where it is not wanted or expected. There are many sources of light pollution. For example some older street lights emit light pollution as do security lights mounted at an angle above the horizontal. Well-designed lighting, on the other hand, sends light only where it is needed without scattering it elsewhere; "The right amount of light and only when and where needed" (Campaign for Dark Skies motto).

However, there is evidence of issues arising as a result of artificial lighting.

- **Wildlife:** Artificial light has disrupted the natural day/night light regime of many organisms. Examples include the earlier start of the dawn chorus by the Blue tit, Chaffinch, Blackbird and Robin, delayed egg laying by European songbirds, disrupted daily commuting behaviour of lesser Horseshoe Bats and shorter foraging times (various authors as quoted in *Reducing the impacts of artificial lighting, British Wildlife 2014*). The creation or maintenance of unlit areas is likely to be the most effective solution for reducing the impact of artificial light on wildlife (Gaston et al 2012).
- **Economy:** Existing artificial lighting systems tend to be inefficient. More focussed lighting requires a lesser luminous flux to illuminate a given area. They can also be costly. For example Part Night Lighting has now been introduced across Norfolk. It involves limiting night time lighting to times of highest traffic volume. It involves the use of photocell technology which measures natural light levels and switches lights off for a period of 5 hours. Norfolk County Council is saving £167,000 per year with part night lighting.
- **Human health:** Exposure to light at night can disrupt the body's production of melatonin, a brain hormone. It can keep us awake at night.

18.2 Dark Sky Status

The International Dark Sky Places Program promotes preservation and protection of night skies across the globe. It is an award administered by the International Dark Skies Association (IDA). In dark sky places, councils, landowners, businesses, individuals and communities work together to reduce light pollution. There are three types of places: Reserve (large areas), Park (small with large population) and Community (smallest).

The Broads Authority is exploring the potential for applying to be a Dark Sky Place. The first step is to understand the quality of the dark sky of the Broads.

18.3 Assessment of dark skies

The skies of the Broads will be assessed in Autumn/Winter 2015/2016 using a Sky Quality Meter (lens). This measures the brightness of the night sky in magnitudes per square arcsecond. The higher the reading, the darker the sky. The entire area of the Broads will be surveyed over a six month period from land and water, thus giving a comprehensive assessment of the quality of the dark skies of the Broads Executive Area.

Regardless of whether the Authority seeks Dark Sky Status, it is proposed that light pollution is addressed through the new Local Plan. Currently, Light Pollution is mentioned in DP28 in relation to amenity, but the NPPF Paragraph 125 says:

“By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”.

Issue 20: how should we address light pollution?

Options	Potential Content	Issues to Consider
Option 1: Roll forward DP28	<ul style="list-style-type: none"> See DP28 of the Development Management document. 	<ul style="list-style-type: none"> Includes light pollution as a criterion. Does not go into more detail about light pollution.
Option 2: Address light pollution in a more detailed way	<ul style="list-style-type: none"> Thrust of the policy would be effectively to answer these questions: <ul style="list-style-type: none"> ➤ <i>Do you need light in the first place?</i> ➤ <i>What is the lighting task?</i> ➤ <i>What is the minimum lighting you require?</i> ➤ <i>Are you over lighting?</i> ➤ <i>If lighting is required, is it designed to not add to sky glow, not result in light trespass and glare and does not over illuminate?</i> The policy would also relate to the findings of the night sky survey. As such, there could be zones that relate to areas of varying levels of dark skies. 	<ul style="list-style-type: none"> Would give light pollution its own detailed policy and thus elevate its importance in the Broads. Would ultimately result in new lighting being fully justified and well designed. Would work well with guidance (see below). Would ensure lighting is considered early on in preparing the plans for a development. Lighting schemes on their own do not always need planning permission.
Option 3: Have a Broads Authority bespoke light pollution guidance	<ul style="list-style-type: none"> This would relate to the type of lighting that is common in the Broads (for example moorings and water side pubs and marinas) Would also reflect the night sky survey results. 	<ul style="list-style-type: none"> The Institute of Lighting Professionals has a guide (<i>GUIDANCE FOR THE REDUCTION OF OBTRUSIVE LIGHT</i>). Could adapt guide to make it more relevant for the Broads. Would ultimately result in new lighting being fully justified and well

Options	Potential Content	Issues to Consider
		<p>designed.</p> <ul style="list-style-type: none"> Would be linked to the new light pollution policy.

18.4 Evidence that has informed this section

Please note that as well as the evidence quoted below, the night sky survey undertaken by the Broads will provide essential evidence to inform this section of the Local Plan.

'Reducing the impacts of artificial lighting'.	British Wildlife, (2014); 25 (5).
'REVIEW: Reducing the ecological consequences of night-time light pollution: options and developments'.	Gaston et al, (2012). Journal of Applied Ecology. Article first published online: 2 NOV 2012. http://onlinelibrary.wiley.com/doi/10.1111/j.1365-2664.2012.02212.x/full
'Missing the Dark: Health Effects of Light Pollution'.	Environ Health Perspect. (2009); 117(1), A20–A27. http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2627884/
'Switch On the Night: Policies for Smarter Lighting'.	Environ Health Perspect. (2009); 117(1), A28–A31. http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2627885/
'Light at Night Co-distributes with Incident Breast but not Lung Cancer in the Female Population of Israel'.	Kloog, Itai, Haim, Abraham, Stevens, Richard G., Barchana, Micha and Portnov, Boris A. (2008), Chronobiology International, 25:1, 65-81. http://informahealthcare.com/doi/abs/10.1080/07420520801921572
GUIDANCE FOR THE REDUCTION OF OBTRUSIVE LIGHT.	https://www.theilp.org.uk/documents/obtrusive-light/
Dorset County Council street lighting and part night lighting.	https://www.dorsetforyou.com/travel-dorset/roads-and-driving/road-information/street-lighting
Norfolk County Council street lighting and part night lighting.	http://www.norfolk.gov.uk/Travel_and_transport/Roads/Road_maintenance/Street_lighting/NCC159261
'The effect of reduced street lighting on road casualties and crime in England and Wales: controlled interrupted time series analysis.'	Steinbach et al. (2015). Journal of Epidemiology and Community Health. http://jech.bmj.com/content/early/2015/07/08/jech-2015-206012.short?g=w_jech_ahead_tab

18.5 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
DP1	Development Management	
DP2	Development Management	
DP4	Development Management	
DP28	Development Management	

19 Retail

25.1 Introduction

Whilst the **Broads Authority Executive Area** may not include town centres, there are some important shopping areas in the larger villages. Five areas have been identified as having a degree of retail provision:

Location	Description
The Bridge area of Wroxham/Hoveton	Contains tourist related shops, restaurants, banks and some of the Roy's complex of shops. Contains a good range and number of shops capable of meeting most of the day-to-day needs of residents. This centre is of more than purely neighbourhood significance and draws in some shoppers from outside of the immediate community as well as catering for visitors in this important tourist hub. To the north east of this area, North Norfolk District Council allocates the area as a Town Centre.
Potter Heigham Bridge	QD (formerly Latham's) is the largest retail outlet in this area selling every day goods as well as clothes and electrical appliances. There are restaurants, an arcade and tourist/recreation related shops. Contains a good range and number of shops capable of meeting most of the day-to-day needs of residents. This centre is of more than purely neighbourhood significance and draws in some shoppers from outside of the immediate community as well as catering for visitors in this important tourist hub. There are no North Norfolk retail related policies at Potter Heigham Bridge.
Lower Street, Horning	Restaurants, a newsagent, post office, deli and tourist related shops (no supermarket, but a large village). There are no North Norfolk retail related policies in Horning.
Bridge Road, Oulton Broad	Restaurants, newsagents, takeaways (no supermarket, but a large village). The area to the east of this road is classed as a District Shopping Area by Waveney District Council in the Development Management DPD.
Bridge Street, Bungay	Some speciality shops. Further to the south west, but not adjacent to this area, is the town centre of Bungay as denoted on the proposals maps of Waveney District Council.

25.2 Definitions

The NPPF defines Town Centres as:

'Town centre: Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.'

Whilst deleted from National Policy, in the absence of other definitions, PPS4 provides an indication of the definition of Local and District Centres:

‘District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.’

‘Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre.’

25.3 Policy context:

The NPPF says at paragraph 23:

Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- *recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
- *define a network and hierarchy of centres that is resilient to anticipated future economic changes;*
- *define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;*
- *promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;*
- *retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;*
- *allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;*
- *allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;*
- *set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;*
- *recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and*
- *where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.*

The NPPG says:

‘A positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits.’

25.4 Permitted Development Rights

Planning permission is not needed when the existing and the proposed uses fall within the same “use class”, or if the Town and Country Planning (Use Classes) Order 1987 (as amended) says that a change of class is permitted to another specified class.

For example, a greengrocer’s shop could be changed to a shoe shop without the need for planning permission as these uses fall within the same “use class”, and a restaurant could be changed to a shop or an estate agency as the Use Classes Order allows this type of change to occur without requiring planning permission. Whilst a change of use might not need permission, any external building work associated with a change of use may still require planning permission.

The Permitted Development Rights as of 15 April 2015 are neatly summarised here:

<http://nlpplanning.com/uploads/ffiles/2015/08/776168.pdf>

It is important to note that not all of these apply to the Broads. For example changes from casinos and arcades to dwellings and storage and distribution to dwellings are not applicable in the Broads.

Issue 34: how to address retail issues in the Broads Local Plan

Options	Potential Content	Issues to Consider
Option 1: no specific policy	<ul style="list-style-type: none"> No policy. 	<ul style="list-style-type: none"> Could be contrary to national policy.
Option 2: set primary and secondary frontages	<ul style="list-style-type: none"> Primary and secondary frontages shown on map. Related policy seeks to restrict changes to the frontage. 	<ul style="list-style-type: none"> Could require a retail study. A new approach for the Broads. Recognises the important contribution made by these centres in the Broads. Seeks to maintain and improve the viability and vitality of centres.
Option 3: retail hierarchy	<ul style="list-style-type: none"> Allocates centres as district centre or local centre. Policy would promote and protect these centres. Is the PPS4 definition a reasonable one to use? 	
Option 4: Retail impact assessment requirement	<ul style="list-style-type: none"> Required for development outside of the defined centre boundary Locally set threshold would be required. 	
Option 5: Safeguard existing retail units	<ul style="list-style-type: none"> Evidence of a robust marketing campaign of at least 12 months will be required that clearly demonstrates that there is no market demand for the premises. 	

25.5 Evidence that has informed this section

PPS4 (not national policy any more)	http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement4.pdf
Planning Portal information	http://www.planningportal.gov.uk/permission/commonprojects/shops#lwanttochangearesidentialbuildingorlandintoashop .
	http://www.planningportal.gov.uk/permission/commonprojects/changeofuse

25.6 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF Compliant?
DP18	Development Management	
HOV1	Sites Specifics	
HOV4	Sites Specifics	

20 Transport

26.1 Introduction

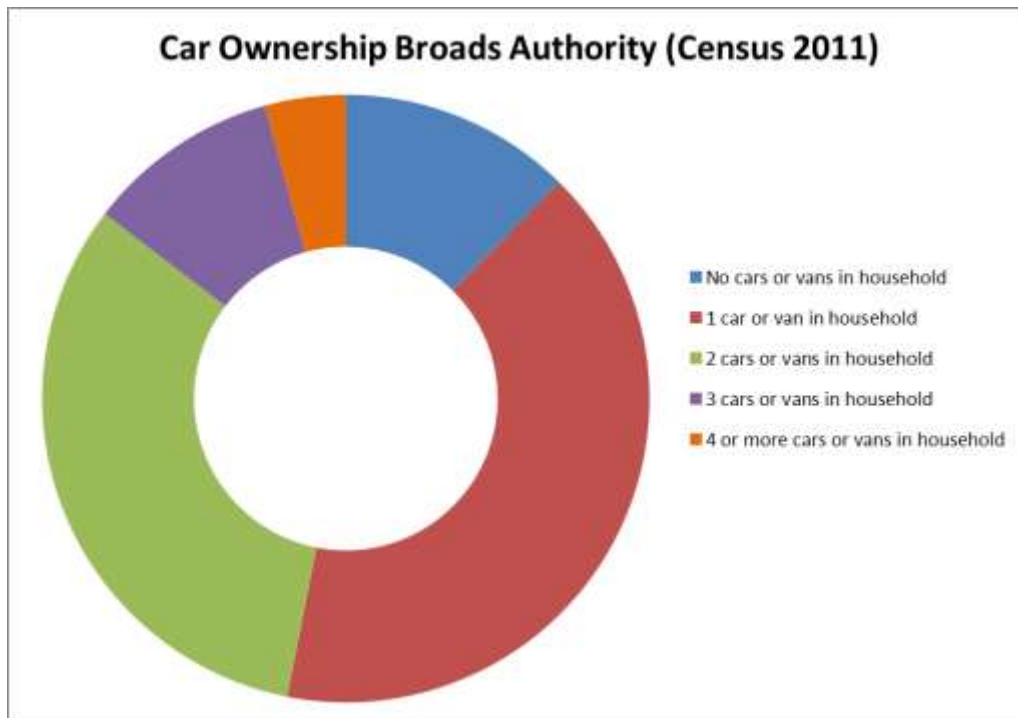
With the majority of the Broads Executive Area being rural, the **road network** can be limiting. That being said, there are urban areas of the Broads with good road connections and there are some major roads running through the area, such as the A47 Trunk Road.

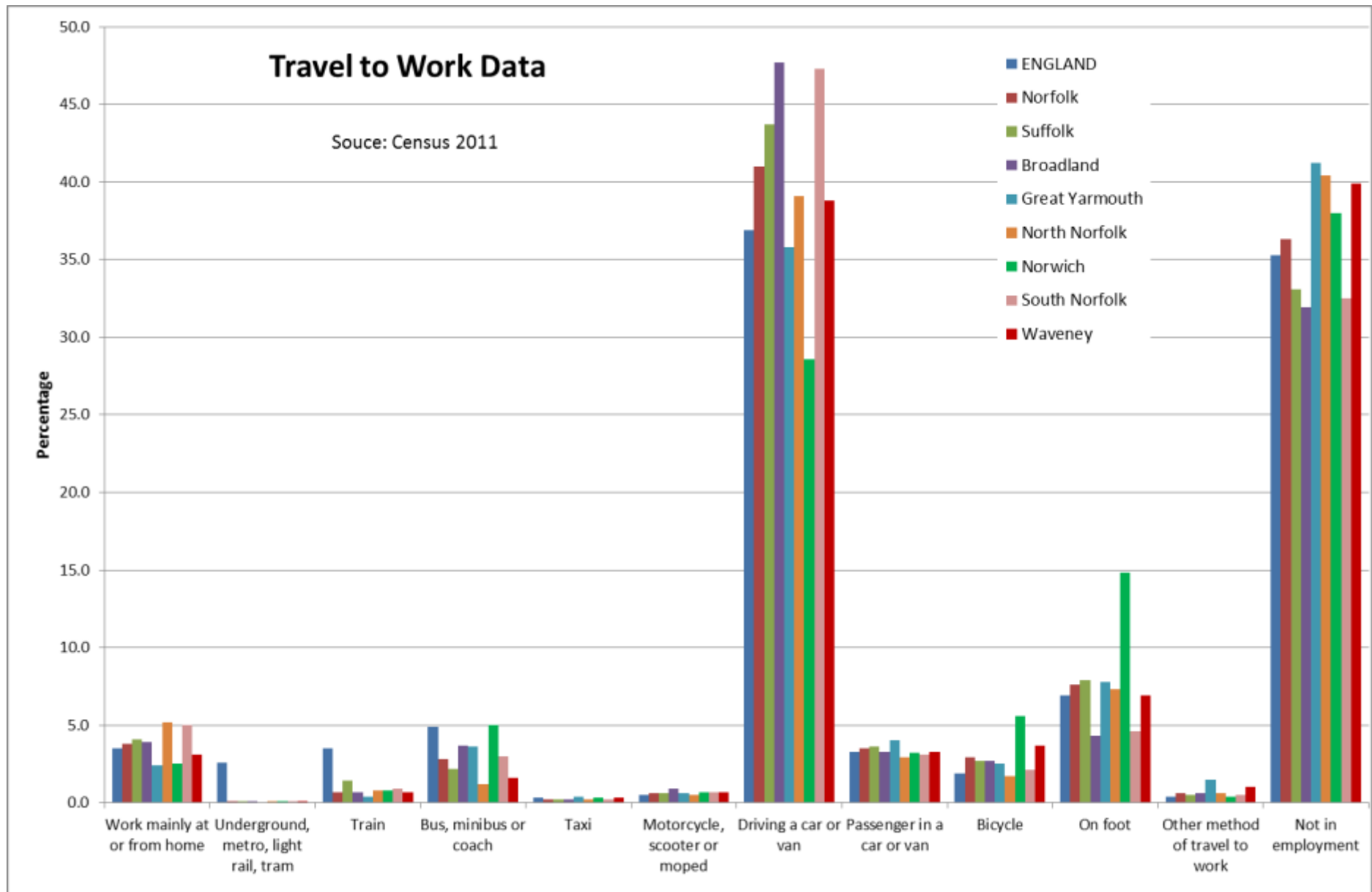
The availability of **public transport** varies around the Executive Area with Norwich and other urban areas being well served (even though the train stations might not necessarily be within the Broads Executive Area) whereas there are often limited alternatives to single occupancy car use in the more rural areas.

The NPPF at paragraph 29 recognises the difference between rural and urban areas:

- *the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.*

The **Census 2011** did not assess Travel to Work for National Parks (including the Broads), but the following graph shows the information for our six districts. Below that is information relating to the number of cars owned by households in the Broads. The most popular mode of travel to work is by car with this being especially popular in Broadland and South Norfolk. Walking, cycling and using the bus are most popular in Norwich. Turning to car ownership (assessed for the Broads), the majority of people own more than one car and 12% of people do not own a car in the Broads Authority Executive Area.



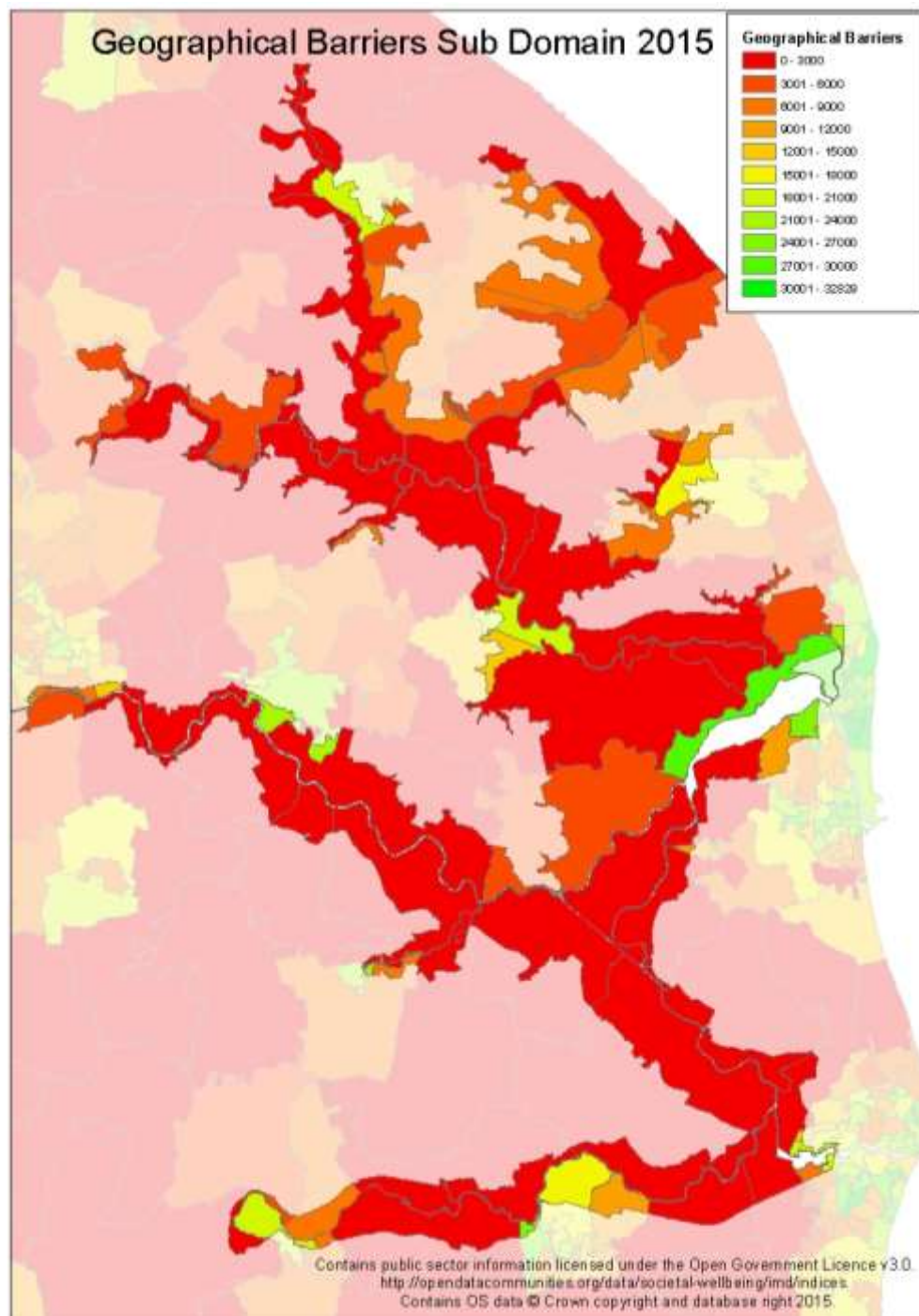


26.2 Access to Services and Facilities

With regards to accessibility, the Indices of Multiple Deprivation Barriers sub domain 'geographical barriers' relates to the physical proximity of local services:

- Road distance to a post office
- Road distance to a primary school
- Road distance to a general store or supermarket
- Road distance to a GP surgery.

The map uses a traffic light system whereby red indicates most deprived and green least deprived



Travel and transport and **access to services and facilities** in an area are key factors when determining the settlement hierarchy and if a settlement should have a development boundary. See [housing section](#). The NPPG Paragraph 17 says

- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*

26.3 Navigable Waterways

The **navigable water-ways** in the Broads are mostly used for recreation purposes. The Broads Authority (and contractors who also maintain the waterways) use the water to transfer maintenance equipment but other industry related use of the water is rare. There are ferries that operate on the water with Reedham Ferry transferring motor vehicles, pedestrians and cyclists and other smaller ferries transferring foot passengers in the tourist season.

Q: How can the waterways be used more for freight and transport purposes?

26.4 A47 Dualling

The A47 is the main east west connection in northern East Anglia. It links Great Yarmouth in the east with Norwich, King's Lynn and Peterborough to the A1. The A1 provides onward connections to the Midlands and north of England. At Great Yarmouth and Norwich connections to Europe and beyond are available via the port and airport. At Great Yarmouth the trunk road continues south, as the A12, to Lowestoft

The A47 passes through the Broads between Acle and Great Yarmouth – the Acle Straight.

There is an ambition promoted by the A47 Alliance to dual the A47 for its full length, including the stretch between Acle and Great Yarmouth. This is a long-term ambition, for post 2021. In the medium term, Highways England plan to undertake safety improvements at key hotspots on the Acle Straight. This could include the installation of safety barriers, junction improvements and road widening or capacity improvements.

In December 2014, funding was announced in the Autumn Statement to deliver improvements along the A47, including safety improvements along the Acle Straight. Two schemes in particular are of relevance:

- A47/A12 Great Yarmouth: junction improvements, including reconstruction of the Vauxhall roundabout.
- Safety improvements at key hotspots and joint working with Natural England to establish environmental impacts and mitigation measures for the medium and long term which could include installation of safety barriers, junction improvements and road widening or capacity improvements.

One of the issues which dualling of the Acle Straight would need to address is the Little Whirlpool Ramshorn Snail. The dykes around the current road are one of the few habitats of the Little Whirlpool Ramshorn Snail – which is on an international 'red list' of endangered species. Little Whirlpool Ramshorn Snail is a small aquatic snail with a flattened spiral shell of approximately 5mm in diameter. It has been declining from the UK since the 1960s, although the reason for decline is not clear.

A study investigated the potential to translocate the snail (AECOM, March 2015). It concluded that translocation was a potential option but identified various considerations such as:

- Pathogen transference has been highlighted as an issue and as such receptor and donor sites should derive from the same drainage unit.
- Donor sites must have a robust population and only sites with no current population should be used as receptor site.
- In order to ascertain these sites and to increase knowledge of the target species robust pre translocation survey is a necessity.
- In addition receptor sites will need to be properly assessed to ensure the receiving habitat is suitable.

Another key issue is the impact of a dualled road on the landscape character of the Halvergate Conservation Area. The A47 crosses an area known as the Halvergate marshes or Halvergate triangle. This area forms one of the defining landscapes of the Broads area being a vast panoramic expanse of grazing marsh dotted with windmills and often teaming with wildlife. The sheer scale, inaccessibility and emptiness of much of the marshland means it remains largely quiet and isolated. It is designated as a Conservation area and its biodiversity interest is recognised through national and international designations. The dualling of the Acle straight has the potential to have a very significant impact on both the existing landscape character of the area and nature conservation interests.

The Broads Authority would not determine any future planning application for dualling the Acle Straight. The scheme is likely to be determined as a Nationally Significant Infrastructure Project (NSIP) by the Planning Inspectorate.

Issue 35: How can the Local Plan address the dualling of the Acle Straight?

Options	Potential Content	Issues to Consider
1: No policy	<ul style="list-style-type: none"> • No policy 	<ul style="list-style-type: none"> • The dualling of the Acle Straight has the potential to come forward during the Plan Period. • No policy could leave the Authority in a weak position when discussing and assessing any proposals. • But other policies of the Local Plan could help influence an application.
2: Criteria based policy.	<ul style="list-style-type: none"> • Would include criteria to be addressed in the design, application and development of the scheme. • Could include: <ul style="list-style-type: none"> ➤ Assessing and understanding, addressing/mitigating landscape impacts, heritage and biodiversity impacts. ➤ Relate to any policy on tranquillity 	<ul style="list-style-type: none"> • A policy could place the Authority in a strong position when discussing and assessing any proposals. • Policy would be a material consideration in determining the application.

Options	Potential Content	Issues to Consider
	<p>and light pollution (see section 17 and 18).</p> <p>➤ Relate to provision for biodiversity and off setting.</p>	
3: Allocate site for dualling.	<ul style="list-style-type: none"> • Would allocate site for dualling. • Would have similar criteria as option 2. 	<ul style="list-style-type: none"> • A policy could place the Authority in a strong position when discussing and assessing any proposals. • The precise land take for the scheme is not known yet. What if the scheme needs more land (for supporting operations) than that allocated? • Policy would be a material consideration in determining the application.

26.6 The Integrated Access Strategy

Provision of facilities that enable visitors and residents to experience, explore and enjoy the Broads and access visitor destination points are guided by and driven in the main by the Integrated Access Strategy. Provision of public access points, routes and services is key to sustainable recreation and tourism. Historically, the strategic management of access in the Broads tended to focus on single elements such as moorings or rights of way. While access improvements were achieved, a need was identified to consider the access network in a more integrated way. The development of an integrated Access strategy was therefore identified as a priority for the Authority in the last Broads Plan (2011).

This Integrated Access Strategy seeks to deliver this long-term aim and meet the following key objectives:

- To improve links between land and water and to the water's edge
- To improve access links to local facilities, settlements and visitor destination points
- To encourage sustainable travel choices such as public transport, walking, cycling and non-powered boating, and improve links between public transport provision and visitor destination points and access routes
- To provide appropriate information and interpretation on access to recreational opportunities

The Integrated Access Strategy will be reviewed in the near future and the next versions of the Local Plan will take this into consideration.

26.7 River Wensum Strategy through Norwich

The River Wensum Strategy partnership was formed by Norwich City Council/the Broads Authority/Norfolk County Council/ the Environment Agency and The Wensum River Parkway Partnership. The strategy aims to breathe new life into the river corridor by enhancing it for the benefit of all and increasing access to, and greater use of, the river through Norwich. The overarching ambition for the river is to play an important part in the growth and vitality of the city again. The Strategy Objectives are:

- Management of the river and its surroundings for the benefit of the city, residents of the wider Norwich area, and visitors.
- Increased access to, and use of, the area by a variety of groups.
- Enhanced economy, particularly boosting leisure and tourism.
- Enhanced natural environment.
- Enhanced heritage.
- Identifying potential income and funding opportunities.

The Action Plan will be signed off in March 2016 and the Authority will consider its findings as the next versions of the Local Plan are produced.

26.8 Safeguarding and Protecting Recreation Routes

The Integrated Access Strategy has identified the potential for remnant disused railway lines to add to the access offer the Broads can provide particularly with regard to improving cycle route links and bridleway routes (there are only 17km of Bridleways in the Broads Executive Area). Lines include the Haddiscoe to Aldeby line, the Beccles to Ellingham line and the Gt Yarmouth to Fritton line. Establishing cycle routes on these disused railways linked to the rural road network would improve the cycling and riding opportunities and help deliver the Government's cycling ambition in the national parks programme which seeks to improve access to national parks by cycle and in and around national parks by cycle.

Issue 36: How can the Local Plan safeguard future recreation routes?

Options	Potential Content	Issues to Consider
Option 1: No policy other than XNS7	<ul style="list-style-type: none"> • XNS7 	<ul style="list-style-type: none"> • Other routes are not safeguarded.
Option 2: Policy that safeguards routes.	<ul style="list-style-type: none"> • Similar to XNS7. • Would safeguard Beccles to Ellingham line and Great Yarmouth to Fritton line. 	<ul style="list-style-type: none"> • Would safeguard these routes for future use as walking and cycle routes. • Would prevent development encroaching onto these routes that could prevent their use for walking and cycling. • Some parts of the entire route are outside of our area but the Authority can liaise with our constituent districts as they refresh their local plans.

26.9 Car parks

In order to improve facilities that provide tourism and access benefits there are some circumstances where provision of parking facilities is essential and in others desirable. For example canoes and boats tend to be transported to slipways by a motor vehicle so the canoeist/boater requires somewhere to leave their vehicle and trailer. Equally the provision of a new facility like a footpath may result in increased car use by people wanting to get to use the path as bus services may not drop off near to the access point.

The Authority does acknowledge the importance of car parks. Some car parks are protected through the Local Plan (for example, HOR2).

Car parks can be designed in a way that is acceptable in the Broads. They also do not need to be immediately by the particular attraction. A short walk from the car park to the access point is acceptable. Of relevance to this issue is the section on landscaping.

Please note that it is not intended that parking standards relating to development such as employment or residential land uses are addressed through a potential policy approach. This section relates more to the location and design of car parking related to slipways and footpaths. The parking design standards of Suffolk and Norfolk County Councils are intended to still remain in place.

Issue 37: How to address car parking in the Local Plan

Options	Potential Content	Issues to Consider
Option 1: no specific policy.	<ul style="list-style-type: none"> No specific policy. 	<ul style="list-style-type: none"> Rely on discussions at planning application stage or conditions. By not making the views of the Authority known in relation to car parking, the initial design or location could not be acceptable.
Option 2: Policy relating to car parks.	<ul style="list-style-type: none"> Criteria based policy to help developers understand locations and design that is acceptable to the area. Could also relate to cycle parking. Issue of boat trailer parking in association with slipways. Relate to electric car charging points. 	<ul style="list-style-type: none"> Could enable suitably located and designed car parks to benefit users of the Broads. Could enable car parking to be well-designed prior to submitting the planning application.

26.10 Transport and Site Allocations and Call for Sites

As we assess sites that come forward through the call for sites process as well as any other site we seek to allocate, public transport, walking, cycling and highway access will all be considered in liaison with either Norfolk or Suffolk County Council (depending on location of site).

26.11 Evidence that has informed this section

FEASIBILITY STUDY ON THE TRANSLOCATION OF THE LITTLE WHIRLPOOL RAMSHORN SNAIL. Report to Highways England March 2015, AECOM.	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/454014/Feasibility_Study_Lesser_Whirlpool_Ramshorn_Snail_DRAFT_Redacted.pdf
Government webpage on East Anglia Rail Franchise.	https://www.gov.uk/government/collections/rail-franchising#east-anglia-rail-franchise
A47 feasibility study	https://www.gov.uk/government/publications/a47-and-a12-corridor-feasibility-study-overview

Halvergate Conservation Area Appraisal	http://www.broads-authority.gov.uk/planning/Other-planning-issues/conservation-areas
Broads Landscape Character Assessment	http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-character-assessments
Broads Integrated Access Strategy	http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/conservation-publications-and-reports/water-conservation-reports/49.-Integrated-Access-Strategy.pdf

26.12 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS16	Core Strategy	
DP11	Development Management	
XNS4	Site Specifics	
XNS7	Site Specifics	
Also referred to in many other adopted policies.		

21 The Broads Economy

27.1 Introduction

The vast majority of the Broads area is rural. The key economic sectors are tourism, agriculture and boat related businesses.

Agriculture is a significant part of the Broads landscape and economy, taking advantage of its flat and fertile river valleys. It is primarily a mix of livestock grazing and some arable cropping, with grassland the dominant feature in the flood plain (40% of the Broads Authority Executive Area).

Tourism drives the economy of the Broads and is a key product in the wider economy of the East of England. It benefits hire boat operators and boatyards, shops, restaurants, holiday accommodation, cafes and a wide range of attractions catering for visitors. A thriving tourism based economy brings additional customers to support riverside amenities, shops, pubs, restaurants. Key facts and figures are:

- The tourist economy of the area was estimated at £594million in 2014, and directly supported more than 7,660 FTE jobs²⁶.
- Much of this tourism is water related with around 12,325 boats on the Broads (in 2014, 10,818 private craft and 1,507 hire craft) but many people also enjoy birdwatching, walking, angling and just being near the water.

The **boatyard industry** has been subject to major change over the past 15 – 20 years leading to the loss of a number of waterside boatyards. There has been a decline/potential stabilisation of the number of hire boats and an increased private boat ownership. The increase in private boat ownership can offer an opportunity for the provision of other services, such as boatbuilding, repair and maintenance, in addition to maintaining demand for re-fuelling, pump-out and mooring facilities. This can increase the diversity and robustness of the sector. In a wider context, the boatyards also contribute to the viability and prosperity of communities, through local spending and employment opportunities. Broads businesses are small, locally owned and managed, with a high proportion of income generated retained in the local area. Some boat builders have relocated parts of their operation to where the buildings are larger and there are better road transport connections. There seems to be less of a need for a waterside location. This presents the challenge of securing an appropriate use for the original site.

One of the major employers in the Broads is **Cantley Sugar Beet Factory** built in 1912. Cantley factory employs a permanent workforce of 120, rising to 180 during the processing campaign which lasts on average for about 140 days. The factory operates 24 hours a day throughout the campaign. The factory also employs up to 150 contractors to carry out maintenance work and provide other services.

Parts of the Broads are near to larger urban areas which are **growth locations** as identified in the New Anglia Strategic Economic Plan. Greater Norwich includes all high impact sectors (advanced manufacturing and engineering, agri-tech, energy, digital culture, life sciences). Lowestoft and Great Yarmouth are designated a Centre for Offshore Renewables, have an Enterprise Zone and are to be an assisted area (this means projects can be given more support from New Anglia's Growing Business Fund and EU pot). Our communities could benefit from these growth locations.

²⁶ STEAM Report: Volume and Value of Tourism in the Broads 2013/14

27.2 Economic Issues

It is becoming apparent that the boatbuilding industry does not necessarily need to be located adjacent to water to operate. It seems that good road access links are of greater importance. The Authority is aware of the desire for some boat builders to relocate. They might not relocate far from their current location and will still be an employer in the area, but this could leave redundant buildings and basins by the water. Of course these locations will be heavily constrained by flood risk.

Issue 38: what should the Authority's approach be for redundant boatyards or boatyard buildings?

Options	Potential Content	Issues to Consider
Option 1: no change to the policy	<ul style="list-style-type: none"> Continue as per policy DP20. 	<ul style="list-style-type: none"> But boatyards don't need to be by water. Could be a restrictive policy. Ensures these sites remain in employment use. Refers to diversification of part of the site to enable the rest of the site to stay on boat related uses.
Option 2: Less restrictive	<ul style="list-style-type: none"> Allow other uses on these sites. Could require moorings retained and some available for public use. 	<ul style="list-style-type: none"> Flood risk a concern. Have a hierarchy of acceptable uses which could still have boat related employment as the preferred use. Viability a consideration. Could see sites change from employment use. Could change character of these areas as currently boatyards are part of the culture of the Broads. If vacated, a less restrictive policy could see these buildings brought back into use quicker. Design a consideration. Could result in loss of waterside services used by boaters, provided by boatyards, such as freshwater and pumpout.
Option 3: Seek to retain sites in employment use.	<ul style="list-style-type: none"> Similar to DP20, but would allow any employment use rather than just relating to boat yards. Could require moorings retained and some available for public use. 	<ul style="list-style-type: none"> Potential to make live/work units (with residential on upper floors)? Flood risk a concern. Could see the character of the area change away from boatyard uses to other employment uses. Design a consideration.

Options	Potential Content	Issues to Consider
		<ul style="list-style-type: none"> • Could result in loss of waterside services used by boaters, provided by boatyards, such as freshwater and pumpout.
Option 4: Promote starter units.	<ul style="list-style-type: none"> • Policy content promotes starter units if boatyard buildings become redundant. 	<ul style="list-style-type: none"> • For boat related industries? • Or should it be for any employment use rather than restricting to boat related uses? • New businesses could find such units useful. • Flood risk a concern. • Design a consideration. • Could result in loss of waterside services used by boaters, provided by boatyards, such as freshwater and pumpout.

27.3 Location of Economic Development.

The 1997 Local Plan was clear in stating that employment proposals inside development boundaries was acceptable in theory and that proposals outside of development boundaries would only be permitted under certain circumstances (relating to boatyards and farm diversification for example).

DP22 of the Development Management DPD only refers to residential development in relation to development boundaries. DP25 also refers to development boundaries in relation to residential moorings. According to DP21, employment is potentially an acceptable use when converting buildings in the countryside. But there is no policy approach regarding where new employment development is acceptable.

Issue 39: How to address location of new employment land in the Local Plan

Options	Potential Content	Issues to Consider
Option 1: maintain approach in the Development Management DPD	<ul style="list-style-type: none"> • Development boundaries only relate to residential development. 	<ul style="list-style-type: none"> • Could see employment in inappropriate locations. • Could result in uncertainty as to the acceptable locations of employment land uses. • Could see employment in settlements or areas that do not have a development boundary in the Broads but are still well-related to other employment areas or settlements. • Issue of a settlement having a development boundary in the boundary of the neighbouring Local Planning Authority. • Allowing employment in areas

Options	Potential Content	Issues to Consider
		without development boundaries could benefit the rural economy.
Option 2: reintroduce the approach of the 1997 Local Plan.	<ul style="list-style-type: none"> Development boundaries relate to residential development as well as employment development. 	<ul style="list-style-type: none"> Could direct employment to more sustainable locations in the Broads. Such locations generally have a large population as well as other facilities and services, including other employment areas. A settlement may not have a development boundary in the Broads part, but could have one in the neighbouring local planning authority area. This area could be well located to the kind of facilities and population a business needs. Employment development outside of the development boundary may be acceptable in certain circumstances and for a particular business.
Option 3: allocate employment areas.	<ul style="list-style-type: none"> Identify employment areas and allocate for this use. 	<ul style="list-style-type: none"> Could be a site specific policy approach or could be a criterion based policy relating to all allocations. Would protect this land for employment use. Would also be areas where future employment is acceptable. Would need to identify areas of current employment to be allocated. Could undertake a call for new sites to be put forward for allocation for employment.

27.4 Evidence that has informed this section

New Anglia Strategic Economic Plan	http://www.newanglia.co.uk/wp-content/uploads/2014/03/New-Anglia-Strategic-Economic-Plan-V2.pdf
STEAM 2014 (tourism figures)	Not on line – an interactive excel spreadsheet.
The Economic and Social Impact of the Broads Marine Industry	http://www.broads-authority.gov.uk/_data/assets/pdf_file/0004/412834/Marine_industry_study_final_report.pdf

27.5 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF Assessment
CS9	Core Strategy	
CS22	Core Strategy	
DP14	Development Management	
DP18	Development Management	
DP19	Development Management	
DP20	Development Management	
CAN1	Sites Specifics	

22 Sustainable Tourism

28.1 Introduction

The Broads attracts more than 7 million visitors a year. Boating, cycling, canoeing, fishing, heritage, walking and wildlife-watching are just some of the ways visitors and those living here enjoy the area.

One of the three key purposes of the Broads Authority is to promote understanding and enjoyment of the Broads but we need to strike the right balance between this and conservation and navigation interests. Tourism brings more than £400 million into the local economy every year but it needs sensitive management to make sure the fragility of this special landscape isn't adversely affected.

The long-term aim for tourism, recreation and access in the current Broads Plan (2011) states that *“Access on land and between land and water is sensitively managed to maximise the social, educational and health benefits of open space to all, while ensuring the resource itself is not degraded. Where possible, improvements are made to the connectivity and use of access routes, linked to visitor destination points and sustainable transport.”*

28.2 The Sustainable Tourism Strategy

The 2011-15 strategy and associated action plan was adopted by the Broads Authority in 2011. Based on extensive research and consultation, it existed as a destination management guide for use by all those with an interest in the area to enhance, manage and promote sustainable tourism in the Broads. While the Broads Authority was responsible for facilitating the creation of the strategy and, in collaboration with Broads Tourism, led on its development, the responsibility for its implementation applied to all organisations, businesses, stakeholders and individuals involved in tourism in the Broads.

The Strategy is being revised and as well as updating the strategy to produce a new guide and action plan for 2016-2021 the new document will form the basis for re-application in late February 2016 for the European Charter for Sustainable Tourism in Protected Areas. This was first awarded to the Broads in 2006 and again in 2011 and provides a framework for all the Authority's tourism activities working in partnership with other key Broads stakeholders and particularly Broads Tourism, whose constitution refers specifically to the Charter. The Charter is an important quality mark which is also of great value in supporting funding applications. The new Broads Tourism Strategy is being produced at the same time as the Broads Local Plan (and Broads Plan). As both plans progress, both teams producing the plans will liaise in any cross cutting issues.

Provision of facilities that enable visitors and residents to experience, explore and enjoy the Broads and access visitor destination points are guided by and driven in the main by the Integrated Access Strategy. This is discussed in more detail in the transport section.

28.3 Tourist Facilities/Venues

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

Issue 40: how to address sustainable tourism in the Local Plan?

Options	Potential Content	Issues to Consider
Option 1: No new policy.	<ul style="list-style-type: none"> No new policy. Roll forward existing policies. 	<ul style="list-style-type: none"> Policies do not specifically identify relevant facilities. Could combine policies and rationalise.
Option 2: Seek to retain tourist facilities through general policy.	<ul style="list-style-type: none"> General presumption of protecting, retaining and enhancing tourist facilities in the Broads. Could address improvements or changes to tourist facilities. 	<ul style="list-style-type: none"> Could need to identify which facilities this applies to but this could be difficult as tourists come for lots of reasons, from walking and bird watching to heritage and painting. Identify tourism sites protecting. Could include Bewilderwood, Pettit's, Beccles Lido, How Hill, Official Tourist Information Centres, Norfolk Wildlife Trust facilities, Fairhaven Gardens, RSPB reserves, Windmill Trust at Hardley. Could be addressed through improving/amending/changing existing policies. Consider toilets, waste disposal and recycling.
Option 3: Site Specific policies for larger tourist attractions.	<ul style="list-style-type: none"> Sites allocated with criteria to guide change and judge any planning applications against. 	<ul style="list-style-type: none"> Could be similar to Whitlingham policy of the Sites Specifics (WHI1). Would need to define a threshold. Attractions such as Bewilderwood could have such a policy. Consider toilets, waste disposal and recycling.
Option 4: Policy for smallscale tourist attractions.	<ul style="list-style-type: none"> Promote small scale tourist sites, well designed and sympathetic and appropriate to location. Likely to relate to need, traffic, design and location. 	<ul style="list-style-type: none"> Recognises that smaller scale tourist attractions are important to the area. Define what small scale means. Could relate to visitor numbers or size of development. Could relate to wildlife watching facilities or museums. Consider toilets, waste disposal and recycling.

28.4 Evidence that has informed this section

Forthcoming Sustainable Tourism Strategy	Due 2016
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28.5 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS9	Core Strategy	
CS11	Core Strategy	
CS19	Core Strategy	
DP14	Development Management	
DP15	Development Management	
WHI1	Sites Specifics	
XNS6	Sites Specifics	

23 Navigation

29.1 Introduction

The third statutory purpose of the Broads Authority is protecting the interests of navigation. The Broads is one of the most extensive and varied inland waterway systems in the UK, offering 200km of boating on lock-free tidal rivers. The navigation reaches from the quiet headwaters of the Bure, Ant, Thurne and Waveney to the bustling centre of Norwich and coastal resorts of Great Yarmouth and Lowestoft.

The Broads Plan (2011) identifies the following threats to navigation. It is important to note that planning is not directly linked to all of these threats.

- Sediment management
- Bank erosion
- Riverside scrub and tree management
- Aquatic plant management
- Navigation safety
- Bridges

29.2 Dredging & Management of Dredged Material

Dredging and the management of the dredged sediment is the largest cost faced by the Authority in the maintenance of the navigation. Dredged material is an important resource for ongoing sustainable management of flood banks and can also be a resource for bankside habitat creation or a beneficial soil improver on agricultural land. Sites where dredged material is used or temporarily dewatered need to be carefully managed during their establishment and ongoing management or restoration so that maximum long-term benefit is achieved with minimum short-term impact on the landscape.

29.3 Bridges

The Broads navigation is impacted in a number of locations by restrictions imposed by road and rail bridges, and these can create impediments for craft wishing to pass. Swinging bridges are also common in the Broads; significantly, three historic rail bridges are situated in the southern rivers of the Executive Area. Due to the age of these bridges, reliability has become an issue in recent years. It is recognised that, in the longer term, sea level rise will have an impact in reducing the accessibility upstream of low bridges.

29.4 Moorings Design Guidance

Moorings are part of everyday life in the Broads for residents, visitors and those who earn a living from working on the river. Being the interface between water and land, it is important that moorings are well considered and well designed. The Broads Authority is keen to see the provision of the right types of safe mooring design in the right places.

The Authority has produced a draft guide on the design of moorings, which was subject to public consultation between July and September 2015 and adopted in November 2015. The Adopted Mooring Guide will be on the Broads Authority website soon.

29.5 New Visitor Moorings

The provision of visitor mooring is essential for the use of the waterways for recreational purposes and the Broads Authority currently provides free visitor moorings in 66 locations. The provision and maintenance of moorings is however expensive and the Authority would like to see a wider range of parties and organisations providing these facilities.

The Broads Authority is producing an updated Mooring Strategy. This will be available by Spring 2016 and will inform subsequent versions of this Local Plan. However, with regard to the issue of the provision of new visitor moorings, Policy DP16 of the Development Management DPD states that:

In addition, proposals for development at or within commercial basins or marinas should:
(h) Provide new visitor (short stay) moorings at not less than 10% of total new moorings provided with a minimum provision of two;

We are aware that improvements are required to the policy as it has resulted in some schemes not coming forward due to the need to provide a minimum of two visitor moorings which has rendered some small schemes unviable. Furthermore, an additional option for consideration could be in relation to off-site contributions or payments in lieu of moorings. A threshold to which this requirement applies will also be needed to make the policy deliverable and reasonable.

Furthermore, by just referring to ‘visitor moorings’ in the policy, there is no scope for discussion with developers with regards to other types of moorings that could be delivered such as de-masting moorings or another gain like a slip-way or charging point.

Issue 41: how do we make the mooring provision as a result of related development more deliverable and reasonable?

Options	Potential Content	Issues to Consider
Option 1: no change to the policy	<ul style="list-style-type: none"> Continue as per policy DP16. 	<ul style="list-style-type: none"> Whilst the policy could result in provision on site, some schemes could be deterred from coming forward. Lack of threshold could affect deliverability of the policy. There will be no official provision for off-site contribution.
Option 2: no policy relating to the provision of visitor moorings as part of a scheme.	<ul style="list-style-type: none"> Remove the requirement for the provision of new visitor moorings 	<ul style="list-style-type: none"> The potential for provision of visitor moorings around the Broads would be reduced significantly.
Option 3: improve the existing policy	<ul style="list-style-type: none"> Apply a threshold to which the policy applies. Incorporate a provision for off-site contributions. Calculate a figure for the off-site 	<ul style="list-style-type: none"> In general, continues the already accepted approach as set out in adopted policy. Will make the policy more reasonable and deliverable.

Options	Potential Content	Issues to Consider
	<p>contribution that encompasses installation, land and maintenance.</p> <ul style="list-style-type: none"> Types of moorings would be determined through discussion with the Authority, rather than just visitor moorings. Emphasising that the moorings will need to be built to the Authority's standards. Potential for other provision such as slipway and electric charging points. 	<ul style="list-style-type: none"> Will help deliver the moorings strategy. The monies collected would help to deliver the mooring strategy for the Broads and would be secured through Section 106 agreements. The Authority is aware of the pooling restrictions when using S106 agreements Viability will need to be considered. The figure for off-site provision could be deemed as too high by some.

Around the system there have been opportunities to moor on wild or informal moorings. It is not for the Local Plan to formalise any of these as typically they do not provide formal mooring opportunities. Informal moorings are unlikely to need planning permission as often the mooring is low key and involves tying a boat to an existing post or flood defence piling.

29.6 Riverbank Stabilisation Guidance

The careful design of bank stabilisation/protection is crucial to protect the special landscape character of the Broads. The Broads Authority is keen to see the use of less engineered forms of bank protection in appropriate areas.

The Authority has produced a guide which was subject to public consultation between July and September 2015. Now adopted by the Authority, this guide provides important information on the design of moorings. The adopted Riverbank Stabilisation Guide will be on the Broads Authority website soon.

29.7 Electric Charging Points

These tend to be found in marinas or at moorings provided by the Broads Authority in less remote areas. They are used to power electric equipment as well as to charge electric boats. Electric boats provide an alternative to diesel powered boats and bring benefits such as quieter engines and less localised emissions of fumes.

Some of the issues to consider include electricity near to water, landscape impact of the charging points, cost of providing electric supply to remote areas as well as ongoing maintenance costs and paying for the electricity.

Q: What are your thoughts on electric charging points? How can a network of charging points be delivered at reasonable cost and without impacting on landscape?

29.8 Evidence that has informed this section

Mooring Strategy	Reviewed by Spring 2016
Riverbank Stabilisation Guide (adopted November 2015)	Soon to be placed on the Broads Authority website.
Mooring Design Guide (adopted November 2015)	Soon to be placed on the Broads Authority website.

29.8 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
DP12	Development Management	
DP13	Development Management	
DP16	Development Management	
DP25	Development Management	

24 Housing

20.1 Housing need in the Broads

The NPPF states:

47. To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period

The Broads Executive Area is part of three separate Housing Market Areas (HMA):

Housing Market Area	Districts in the HMA	Strategic Housing Market Assessment (SHMA) progress.
Central Norfolk	North Norfolk, South Norfolk, Norwich, Broadland, Breckland	Completed 2015
Great Yarmouth	Great Yarmouth	Completed 2013
Waveney	Waveney	Ongoing

As most of the Broads Executive Area is within the Central Norfolk Housing Market Area, that Strategic Housing Market Assessment²⁷ (SHMA) calculated the Objectively Assessed Housing Need for the entire Broads Executive Area.

The Objectively Assessed Housing Need (OAN) for the Broads is shown in the following table. [Appendix E](#) gives more detail in relation to the methodology used and the findings of the study. The OAN is for the period 2012 to 2036. Data based on November 2015 Draft.

Part of the Broads in...	Objectively Assessed Housing Need	Annual average from 2012 to 2036
Broadland	57	2.4
Great Yarmouth	69	2.9
North Norfolk	103	4.3
Norwich	3	0.13
South Norfolk	37	1.5
Waveney	51	2.1
Total:	320	13.33

20.2 Housing

On the issue of meeting the objectively assessed need, the NPPF at Para 47 says Local Planning Authorities should:

'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period'

²⁷ A SHMA is a study which identifies housing need for an area. See [Appendix E – Objectively Assessed Housing Need](#) for more detail.

It is important to note that The NPPF places great weight on the status of the Broads (para 14, footnote 9).

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless... specific policies in this Framework indicate development should be restricted.

For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

In deciding how to address housing need, the Authority will have to decide how to balance the demands of meeting the needs and protecting the Broads

Issue 22: How can the Local Plan address the Full Objectively Assessed Housing Need of the Broads?

Options	Potential Content	Issues to Consider
Option 1: Housing requirement of zero.	<ul style="list-style-type: none"> Roll forward existing uncompleted allocations from the Sites Specifics Local Plan. Do not meet the need of the Broads within the Executive Area, but in the wider Housing Market Area. 	<ul style="list-style-type: none"> Appropriate housing development in the Broads could still take place. Development would be classed as windfall. Memorandum of understanding signed with constituent districts to reflect that the need of the Broads is low when compared to that of the Housing Market Area and that the Broads is a protected area. Districts would meet the need of the Broads in the areas outside of the Executive Area. Districts would count windfall towards their housing requirement. Would result in need being delivered for the Broads. Broads area continues to be protected from inappropriate development. Appropriate development could have been allocated in areas which could benefit from new housing.
Option 2: Meet full objectively assessed housing need in the Broads.	<ul style="list-style-type: none"> Allocate sites to meet the residual requirement. 	<ul style="list-style-type: none"> Would need to understand the completions and permissions in the Broads to determine the residual requirement the Local Plan needs to allocate. Would need to undertake call for sites as well as a housing land availability assessment to understand the capacity of the Broads to meet the need. Could still rely on districts to deliver

Options	Potential Content	Issues to Consider
		<p>the need.</p> <ul style="list-style-type: none"> But the Broads could deliver some of the districts' need. Could see inappropriate residential development as a result of pressure to meet the need. Could result in harm to the special qualities of the Broads. Areas allocated for new housing could benefit from such development.

Q: Do you have any comments on the issue of meeting the objectively assessed housing need of the Broads?

20.3 Affordable Housing

The NPPG notes that affordable housing need is based on households *“who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market”*.

It is accepted that the Broads Authority defers to the affordable housing policy of our constituent districts (see DP23 of the Development Management Policies). Furthermore, as the Authority is not the Housing Authority, we work closely with our Districts who do undertake the housing function for our area. The current adopted levels of affordable housing for our districts are:

District	Document	Policy
Great Yarmouth	Core Strategy (2015)	<ul style="list-style-type: none"> Sub area 1: 20% on sites of 5 or more. Sub area 2: 10% on sites of 5 or more Sub area 3: 10% on sites of 15 or more
North Norfolk	Core Strategy (2008)	<ul style="list-style-type: none"> 10 or more dwellings or sites of more than 0.33 hectares in Principal and Secondary Settlements, not less than 45%. 2 or more units or on sites larger than 0.1 hectares in Service Villages and Coastal Service Villages, not less than 50%
Broadland	Joint Core Strategy (2011 and 2014)	<p>The proportion of affordable housing, and mix of tenure sought will be based on the most up to date needs assessment for the plan area. At the adoption of this strategy the target proportion to meet the demonstrated housing need is:</p> <ul style="list-style-type: none"> on sites for 5-9 dwellings (or 0.2 – 0.4 ha), 20% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5) on sites for 10-15 dwellings (or 0.4 – 0.6 ha), 30% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5) on sites for 16 dwellings or more (or over 0.6 ha) 33% with approximate 85% social rented and 15% intermediate tenures (numbers rounded, upwards from 0.5)
Norwich		
South Norfolk		
Waveney	Development	<ul style="list-style-type: none"> From the start of 2015 planning applications for 5 to 14

District	Document	Policy
	Management Policies (2011)	<p>dwelling inclusive shall provide 35% affordable housing on-site or provide an equivalent off-site financial contribution for affordable housing elsewhere.</p> <ul style="list-style-type: none"> Outside the Area Action Plan area of Lake Lothing planning applications for proposals of 15 or more dwellings shall provide a minimum of 35% on-site affordable housing.

The Central Norfolk SHMA has calculated the need for Affordable Housing for four of our constituent districts. Waveney and Great Yarmouth have not been calculated as part of this study. These figures are not adopted.

	Broadland	North Norfolk	Norwich	South Norfolk
Total Affordable Housing	2,200	2,200	7,000	3,400
Total Housing	13,100	10,100	19,900	19,200
Percentage	16.79%	21.78%	35.18%	17.71%

Waveney District Council will produce their affordable housing figure as part of their SHMA which is being produced at the time of writing.

We intend to role forward the policy approach of using the percentage of our districts. We will work with them as they produce their Local Plans. This gives consistency across a district and reflects our districts undertaking the Housing Authority function for the Broads.

The Authority is aware that parts of its current affordable housing policy (DP23) are not necessarily NPPF compliant, particularly in relation to exception sites. These issues will be taken into consideration as we propose policy content at the next stage of the Local Plan process.

Do you have any comments on this approach?

In November 2014, a new Government policy was introduced that said affordable housing and tariff style contributions should not be sought on sites of 10 units or less, and which have a maximum combined gross floor space of 1,000 square metres. A High Court ruling in July 2015 quashed this policy. However, recently the government has been granted permission to appeal against this High Court ruling. The Authority will monitor the progress and decision of this appeal and act accordingly.

20.4 Gypsy, Traveller and Travelling Show People Need in the Broads

The Planning Policy for Travellers states that:

'the Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.'

The Authority is not the housing authority for its area; our constituent districts undertake that role for their entire area, including that which is in the Broads. The Authority is also not aware of existing sites within its Executive Area nor is it aware of any unauthorised sites. Our constituent districts assess the need for their entire area, including that which is the Broads Executive Area and will deliver the need in their district, outside of the Broads. The following table summarises discussions with our constituent districts.

District	Information on Gypsy and Travellers
Broadland	The Council's Cabinet resolved on 5 March 2013 to ' <i>continue with monitoring the need for Gypsy and Traveller sites, dealing with private sites via planning applications, to do work with partner organisations on the scope for bringing forward transit sites, and producing a Gypsy and Traveller specific Development Plan Document if required in the future. Accordingly, it is not proposed to identify specific sites in the Site Allocations document.</i> '
Great Yarmouth	The 2013 Strategic Housing Market Assessment assessed Gypsy and Traveller need for the entire Borough including that which is the Broads. GYBC are meeting the entire need in their Local Planning Authority area.
North Norfolk	As produce new Local Plan, are likely to commission evidence base on this issue, potentially with neighbouring authorities.
Norwich	Local plan policy DM14 covers this issue. While no specific site has been allocated, DM14 has the criteria for assessing gypsy and traveller site applications and commits the city to providing for the need, either through identifying and developing sites through planning applications or, if this does not happen by the end of March 2016, through a focussed local plan. The council is currently working on identifying a site, which will be brought forward through a planning application. This will meet the short term need.
South Norfolk	The South Norfolk Gypsy, Traveller and Travelling Show People Accommodation Assessment assessed the entire area of South Norfolk and identified a need for 35 pitches from 2014 to 2031. The South Norfolk Gypsy and Traveller Local Plan will seek to allocate the objectively assessed need, subject to sufficient suitable sites being identified within the South Norfolk Local Planning Authority area.
Waveney	As Waveney produce their Local Plan, they will assess the bi-annual caravan counts to see if there is a need for further evidence. There is a relatively recent needs assessment (2013), which indicates that there is not a significant issue regarding lack of gypsy and traveller sites in the area. The requirement is for 10 pitches over the 15 year period to 2027, taking into account the 3% household growth predicted in the gypsy and traveller community, of which the first 5 year allotment has been delivered already.

Issue 23: How can the Local Plan address Gypsy and Traveller needs?

Options	Potential Content	Issues to Consider
Option 1: Do not address Gypsy and Travellers in the Local Plan.	<ul style="list-style-type: none"> No policy. 	<ul style="list-style-type: none"> The Government's Planning Policy for Travellers says '<i>...Government's aims in respect of traveller sites are (inter alia) for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies</i>'
Option 2: Have a criteria based policy.	<ul style="list-style-type: none"> Criteria based policy. Criteria will reflect the needs of Gypsy and Travellers as well as reflect the special qualities of the Broads. 	<ul style="list-style-type: none"> Will enable applications for Gypsy and Traveller pitches or sites in the Broads to be assessed. The Government's Planning Policy for Travellers says '<i>Where there is no identified need, criteria-based</i>

Options	Potential Content	Issues to Consider
	<ul style="list-style-type: none"> Reflect criteria set at paragraph 11 of the Government's Policy for Traveller Sites. 	<p><i>policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.'</i></p>
Option 3: Allocate land for Gypsy, Travellers and Travelling Show People.	<ul style="list-style-type: none"> Sites allocated for Gypsy and Travellers and Travelling Show People. 	<ul style="list-style-type: none"> ➤ The Government's Planning Policy for Travellers says 'that local planning authorities should make their own assessment of need for the purposes of planning'. • It also says to ensure that local planning authorities 'working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites' • Our districts are meeting the need for the Broads as described previously in this section. • During the Call for Sites exercise, potential sites might be identified.

20.5 Settlement Hierarchy and Development Boundaries

The purpose of a development boundary is to consolidate development around existing built-up communities where there is a clearly defined settlement and where further development, if properly designed and constructed, would not be incongruous or intrusive because of the size of the settlement. Development Boundaries have twin objectives of focusing the majority of development towards existing settlements whilst simultaneously protecting the surrounding countryside.

Currently, four areas in the Broads Executive Area have development boundaries. These are detailed in policy XNS9 of the Sites Specifics Local Plan and are shown on the adopted policies maps. The four areas are:

- A. Horning
- B. Wroxham and Hoveton
- C. Oulton Broad
- D. Thorpe St Andrew

It is proposed to assess all the settlements in the Broads Executive Area for their suitability for a development boundary. It is proposed that the first stage of this process is to produce a Settlement Hierarchy.

There is currently no Settlement Hierarchy of the settlements in the Broads. It is usually the case that the rural part of a Parish is within the Broads Executive Area, with the built up part in the neighbouring Local Planning Authority's area. However there are some built up areas in the Broads.

In determining a Settlement Hierarchy for the Broads, we have taken into account how our constituent Councils have rated shared settlements in the Broads Executive Area. We have also used a scoring mechanism which Great Yarmouth Borough Council used when they produced their Sustainable Settlement Study (2012)²⁸. The methodology seeks to assess what facilities a settlement has within or nearby.

The Broads Authority assessment is currently being undertaken by planners at the Broads Authority. The assessment will be reflected in the next stage of the Local Plan.

20.6 Residential Moorings

Our current approach for permitting residential moorings is set out in Development Management Policy DP25. In the Sites Specifics Local Plan, we have extended the areas in which we are likely to permit Residential Moorings to reflect the fact that some areas may not have a development boundary, but may have good access to facilities. In particular policies BRU2, BRU4, BRU6, HOR7, HOR8, STA1 say *'Development Management policy DP25 (New Residential Moorings) will apply as the (marina) will be treated as if it were adjacent to the development boundary'*.

Q: Are there any areas which you think are suitable for residential moorings?

We would like you to consider any areas which you think are suitable for residential moorings which meet the criteria as set out at Appendix F. You will need to fill out the form at [Appendix F](#) and say how/why your nomination meets the criteria set out in DP25. You will need to provide a map with the proposed area of moorings drawn on. Your nomination will then be assessed by a panel of Officers from the Broads Authority in an open and transparent way. We will allocate appropriate areas for residential moorings in the next version of the Broads Local Plan.

Please note that:

- You need to use the form at [Appendix F](#) to nominate an area.
- We need a map that clearly shows the area nominated.
- We cannot guarantee that your nomination will be allocated for residential moorings as the nomination might not be suitable.
- Your nomination will be made public.

20.7 Floating Buildings

With much of the Broads prone to flood risk, there are limited areas for development of buildings. Floating buildings are used around the country and world in areas prone to flooding.

To date the Authority's approach has been one of a presumption against such buildings. The Local Plan Issues and Options offers the opportunity to further consider the issue. Below are some issues that need to be considered in relation to floating buildings.

- **Definitions**

²⁸ <http://www.great-yarmouth.gov.uk/consumption/groups/publicgybc/documents/article/gybc145936.pdf>

The adopted Development Management DPD defines **houseboats** as '*a static vessel or purpose-built structure with no form of mechanical propulsion, used or designed for residential purposes*'. These are different to residential moorings. Locally, houseboats are also called 'flat-a-floats'.

Residential moorings are for boats used as someone's sole or primary residence and allow them to stay long term – the boat can be moved so is not static like houseboats are. The boats that use residential moorings can be called 'live-aboards'.

There are two types of **floating buildings**; permanently floating buildings and those that float only when flood waters swell, but sit on the ground during dry conditions.

A house on dry land in Holland, which floats if waters swell.



Again in Holland, this house floats on the water



- **Broads Housing Need**

Whilst the Broads Authority does have a housing need as discussed earlier in this section, the figure of 274 dwellings is to be adjusted for completions and then current allocations and permissions need to be considered. As such, the need for the Broads Authority is not likely to be 274 dwellings but considerably less. This will be discussed further in the Preferred Options of the Local Plan. It could be that the residual need could be met on land or by our constituent district councils rather than on water. The contribution that houseboats and or/floating structures could make to meeting the housing need of the Broads is a matter to be developed through the production of the Local Plan.

- **Design**

There are instances of some house boats in the Broads. Many are quite basic in their appearance. They may add to the local character but equally, would the character of the Broads be affected by more of these types of houseboats or floating houses?

Design is an important aspect of all development in the Broads because of its special qualities. These special qualities are the reasons why people live in, work in and visit the Broads. If houseboats or floating buildings were considered appropriate in principle, the detail of the design will be an important consideration to determine if a scheme was acceptable. There could be potential for well designed, innovative and striking floating buildings in the Broads but design is a very subjective issue.

- **Location**

It is likely that the acceptable location of these floating buildings would be similar to if not the same as that of residential moorings. That is to say that locations where facilities and services often used by the community, such as GPs, shops and schools, are a walking distance from the proposed location. There are some locations in the Broads which have good access to services and facilities.

Another aspect of location is that of potential landscape impact. The sensitivity of the landscape to accommodate buildings of this type would need to be carefully considered. Not forgetting that adverse impact on navigation should be avoided.

- **Function**

How electricity, gas and freshwater are provided and foul water and waste disposed of in an appropriate way will be important considerations for any floating building. Furthermore, the user will likely want somewhere to park their car. Access to land will also be a consideration.

- **Flood Risk**

This is a major issue. National Policy seeks to avoid residential development in areas of high flood risk unless there is no other choice (sequential test) and can be made safe (exception test).

That being said, by their very nature such buildings will float. There are two types of floating buildings; permanently floating buildings and those that float only when flood waters swell, but sit on the ground during dry conditions.

Such floating buildings are present elsewhere in the country and indeed the world.

- **Uncertainty**

There will be issues with interpretation of definitions:

- When is a boat a boat?
- When is a floating building a building?
- When is a floating building a boat?

- **Houseboats - Need**

The Housing and Planning Bill includes a requirement for Local Housing Authorities (a function carried out by our districts) *‘to consider the needs of people residing in or resorting to their district with respect to the provision of (inter alia) places on inland waterways where houseboats can be moored’*. The Authority will monitor the Bill and work with Local Housing Authorities (our districts) on this issue.

Q: What are your thoughts on floating buildings? Do you have any evidence to address the issues raised?

20.8 Rural Enterprise Dwellings

Rural enterprise dwellings are those dwellings needed to support agriculture, forestry, boatyards, tourism and other rural employment. Essentially these operations may need staff to be near to the operation in case of emergencies or because they may effectively be on duty for 24 hours a day.

Being a predominantly rural area with many rural enterprises, the Broads Authority does receive applications for these types of dwellings. The NPPF paragraph 55 does also address this issue and paragraphs 102 to 105 are of relevance:

'Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:

- *the essential need for a rural worker to live permanently at or near their place of work in the countryside; or*
- *where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or*
- *where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or*
- *the exceptional quality or innovative nature of the design of the dwelling. Such a design should:*
 - *be truly outstanding or innovative, helping to raise standards of design*
 - *more generally in rural areas;*
 - *reflect the highest standards in architecture;*
 - *significantly enhance its immediate setting; and*
 - *be sensitive to the defining characteristics of the local area.'*

Prior to the NPPF, Planning Policy Statement (PPS) 7 was the relevant Government policy and guidance which helped to determine such applications. PPS7 has been withdrawn. The Authority already has adopted policy DP26 which helps determine such applications, however there is a lack of guidance and some elements of PPS7 are not included in DP26.

Issue 24: How can the Local Plan address the issue of rural enterprise dwellings?

Options	Potential Content	Issues to Consider
Option 1: Roll forward DP26	<ul style="list-style-type: none"> Improve so compatible with NPPF. 	<ul style="list-style-type: none"> Some elements of PPS7 will not be addressed in the policy. Continued absence of guidance in determining planning applications.
Option 2: Enhance DP26 to further enshrine the principles of PPS7	<ul style="list-style-type: none"> Assess DP26 against PPS7 and incorporate the principles of PPS7 in an improved policy. 	<ul style="list-style-type: none"> Will provide greater guidance for determining relevant applications. Will fill a policy/guidance gap that currently exists.
Option 3: Make short guidance for determining relevant planning applications	<ul style="list-style-type: none"> Could be linked to an improved policy. Would enshrine the elements of PPS7 that are useful guidance. Could be a checklist to ensure relevant information is provided to support planning applications and set out how the Authority will determine these planning applications 	<ul style="list-style-type: none"> Would provide needed guidance for determining relevant planning applications. Sets out specifically what applicants need to address. Could enable such applications to run smoothly through the decision-taking process.

210.9 Second Homes and Holiday Homes

Holiday and second homes can put pressure on housing in rural areas. The Authority has investigated the numbers of holiday and second homes in the Broads using Council Tax data (April 2015). It is estimated that the following numbers of second and holiday homes are within the Broads part of each of our districts.

The following are the definitions of Holiday Homes and Second Homes that the Broads Authority has applied:

- **Second Homes:** these are properties used by an individual or family, but not as their main home. They will have a main home elsewhere which is their principal address, although they may use their second home for extended periods which will include for holidays. This definition excludes homes rented out for medium to long-term occupation (i.e. someone else lives there and is likely to live there for at least 6 months and pays rent).
- **Holiday Homes:** these are properties available for rent and which are occupied successively by a series of separate individuals or families. They are rented out for a set period of time, rarely for more than two or three weeks to one set of users, and are used for holidays.

	Dwellings in BA part of District.	Second Homes	Holiday Homes	Total	%
Broadland	632	86	70	156	24.7%
Great Yarmouth	829	142 (undifferentiated)			17.1%
North Norfolk	881	217-239	147	364 - 386	41.3% - 43.8%
Norwich	43	0	0	0	0
South Norfolk	499	26	7	33	6.6%
Waveney	721	18 to 23 (undifferentiated)			2.5-3.2%

Please note that:

- Postcode data was used for Norwich City Council, but there are no second or holiday homes in the Broads part of Norwich.
- Unique Property Reference Numbers (UPRN) were used to ascertain numbers for South Norfolk. This is therefore an accurate number.
- For the other four districts, only postcode data was provided (no UPRN). Not all of a post code area is within the Broads. As such, the list of second and holiday homes for the entire district was assessed manually to determine if the address was in the Broads or not. These figures should therefore be treated as estimates. Where there is a range, this reflects uncertainty as to whether the address is within the Broads Executive Area or not.
- Total homes calculated using the Broads Authority's mapping software.

The data seems to show a higher proportion of second homes than holiday homes. Second homes are not available for residential use to support the housing needs of a community and they are not available to tourists for holiday use to support the local economy. The current policy approach has more recently sought to restrict growth of second homes.

It is important to note that not all second homes need planning permission as someone can own more than one home. Any policy would therefore only apply to applications specifically for second homes.

Issue 25: How should the Local Plan address second homes in the Broads?

Options	Potential Content	Issues to Consider
Option 1: Roll forward DP15 with	<ul style="list-style-type: none"> • Slight changes to make NPPF compliant. 	<ul style="list-style-type: none"> • Will not address any geographical issues relating to second homes.

Options	Potential Content	Issues to Consider
limited changes.		<ul style="list-style-type: none"> Will not result in any changes to the Authority's approach to second homes.
Option 2: Policy approach that is more restrictive on second homes.	<ul style="list-style-type: none"> Not permit any more second homes in the Broads. Make it easier for second homes to become market dwellings. 	<ul style="list-style-type: none"> Will not address any geographical issues relating to second homes. Could see more Market Housing in the Broads. Could be overly restrictive.
Option 3: Policy approach that is more permissive for second homes.	<ul style="list-style-type: none"> Policy approach less restrictive than DP15. 	<ul style="list-style-type: none"> Will not address any geographical issues relating to second homes. Could increase the percentage of dwellings in the Broads that are second homes as opposed to market homes. Could be overly permissive.
Option 4: A policy approach that relates to locations.	<ul style="list-style-type: none"> Allow second homes in area which do not contain many second homes only. 	<ul style="list-style-type: none"> Could increase the percentage of dwellings that are second homes in some areas. Would maintain the level of second homes in those areas with a high proportion of second homes. Could be overly restrictive in some areas and permissive in others. Would need to identify a threshold above which the policy applies.

20.10 Housing for Older People

The NPPG says:

'Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan.'

Older people in housing are included in the Objectively Assessed Need as calculated in the Central Norfolk SHMA. However, those in Class C2 are not included.

According to the Central Norfolk SHMA, the institutional population (older people residing in care homes) is projected to increase by 4,551 persons between 2012 and 2036 in the Central Norfolk SHMA authority areas (North Norfolk, Norwich, Broadland, South Norfolk, Breckland). The OAN as set out previously in this section does not include this figure. It does not necessarily follow that all of this need should be provided as additional bedspaces in residential institutions in Use Class C2.

It is important to note that the Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible, thereby avoiding expensive hospital and care home services. Therefore, despite the ageing population, current policy means that the number of care home and nursing home beds required may increase proportionately more slowly than the number of older people, as people are supported to continue living in their own homes for longer.

If bedspaces in residential institutions in Use Class C2 are counted within the housing supply (to meet the target/need) then the increase in institutional population aged 75 or over would need to be counted as a component of the housing requirement (in addition to the assessed OAN). If these bedspaces are not counted within the housing supply, then there is no need to include the increase in institutional population as part of the housing requirement.

Additional to the conclusions of the Central Norfolk SHMA, Norfolk County Council is developing a comprehensive Housing Strategy Framework, due to be completed early in 2016.

- To encourage housing with support as a solution to preventing people requiring more intensive institutional care
- To encourage greater self-reliance within supportive communities
- To develop the most cost effective solutions to meet care outcomes
- To offer a range of options within the constraints of Norfolk geography and demography
- To support the objectives of integrating health, social care and housing policy

Great Yarmouth Borough and Waveney District may have a small number of older people needing Class C2 use properties in the Broads part of their area which the Central Norfolk SHMA has not calculated. This will add to the housing requirement. Through the Norfolk Strategic Framework Housing Group, the county-wide approach to addressing older people housing will be agreed. The Authority will also work with Waveney District Council as their SHMA is produced. We will continue to monitor evidence and discussions and address accordingly in future versions of the Local Plan.

20.11 People wishing to build their own homes

The term 'self-build' or 'custom-build' is used when someone obtains a building plot and then builds their own home on that plot. The majority of work can be completed by the future occupiers, or the future occupier could take the role of project manager and employ professionals to deliver their plans. Such homes can be built as a one off or on a community basis.

The NPPG states:

The Government wants to enable more people to build their own home and wants to make this form of housing a mainstream housing option. There is strong industry evidence of significant demand for such housing, as supported by successive surveys. Local planning authorities should, therefore, plan to meet the strong latent demand for such housing. Additional local demand, over and above current levels of delivery can be identified from secondary data sources such as: building plot search websites, 'Need-a-Plot' information available from the Self Build Portal; and enquiries for building plots from local estate agents. However, such data is unlikely on its own to provide reliable local information on the local demand for people wishing to build their own homes. Plan makers should, therefore, consider surveying local residents, possibly as part of any wider surveys, to assess local housing need for this type of housing, and compile a local list or register of people who want to build their own homes.

Further regulations/guidance on this issue is awaited from Government.

It is important to note that one of the Authority's constituent districts, South Norfolk, is a pilot project to identify and test various approaches to enable custom build housing in their area²⁹. As a Vanguard authority, South Norfolk shall provide information to the Department for Communities and Local Government about learning from this pilot project, which will be taken into account in future policy-making and guidance to local authorities.

²⁹ <http://www.south-norfolk.gov.uk/planning/7215.asp>

It is important to understand that self-build/custom-build schemes are still required to meet the policy requirements in local plans as well as national policy and guidance. The schemes are still subject to the same constraints as developer delivered dwellings.

According to the Self-Build Portal³⁰ (checked 6 November 2015) there were three expressions of interest in the Broads area:

- A group want a site in the Coltishall area for a 3 or 4 bed property with garage.
- A single person wants a site for 1 dwelling in Barton Turf.
- A single person wants a site for 1 dwelling in the Chedgrave area.

Issue 26: How can the Local Plan support those who wish to build their own homes?

Options	Potential Content	Issues to Consider
Option 1: No policy.	<ul style="list-style-type: none"> • No policy. 	<ul style="list-style-type: none"> • Rely on the self-build register. • Rely on other organisations to help find land for self-building. • The other policies of the Local Plan will be in place to determine such planning applications.
Option 2: Set a requirement for self-build plots as part of site allocation policies.	<ul style="list-style-type: none"> • Would be a criterion as part of allocation policy. 	<ul style="list-style-type: none"> • Would require use of conditions specific to the self-build element of subsequent applications covering design and time limits for example. • Would require viability testing. • Would provide land for those wishing to build their own home in the Broads Executive Area. • Self-build projects can provide innovative dwellings, although the appropriateness of the design will be of importance.
Option 3: Policy requiring a percentage of plots set aside for self-build.	<ul style="list-style-type: none"> • Will require a threshold. • Will set a percentage of plots to be self-build. • Will need to address the issue of self-build plots not being taken up. 	<ul style="list-style-type: none"> • Design and location of dwellings is an important factor in the Broads. • The other policies of the Local Plan will be in place to determine such planning applications. • The issue of the plot being serviced will need to be considered and addressed. • Different design styles within a development are a consideration. Would there need to be a requirement for the scheme to be coherent across the whole development? Or would differently designed dwellings give character to an area? • Self-builds can take longer to build than the rest of a development.

³⁰ <http://www.selfbuildportal.org.uk/>

Options	Potential Content	Issues to Consider
		Potential to affect the potential for a developer to fully complete a site which could cause problems with regards to sales.

20.12 Starter Homes

In a written ministerial statement on 2 March 2015, the Government announced the following:

Local planning authorities should work in a positive and proactive way with landowners and developers to secure a supply of sites suitable for housing for first-time buyers. In particular, they should look for opportunities to create high quality, well designed starter homes through exception sites on commercial and industrial land that is either under used or unviable in its current or former use, and which has not currently been identified for housing.

Where applications for starter homes come forward on such exception sites, they should be approved unless the local planning authority can demonstrate that there are overriding conflicts with the national planning policy framework that cannot be mitigated.

Planning obligations should be attached to permissions for starter homes on starter homes exception sites, requiring that the homes are offered for sale at a minimum of 20% below open market price, to young first-time buyers who want to own and occupy a home. They should also prevent the re-sale and letting of the properties at open market value for a five year period.

In view of their contribution to meeting housing needs, starter homes exception sites should not be required to make section 106 affordable housing or tariff-style contributions.

Exception sites may include a small proportion of market homes, at the planning authority's discretion, where this is essential to secure the required level of discount for the starter homes on the site.

The Housing and Planning Bill includes provisions for Starter Homes. We will monitor the Bill as it passes through its stages towards becoming an Act. According to the Bill:

'starter home' means a building or part of a building that—

- (a) is a new dwelling,*
- (b) is available for purchase by qualifying first-time buyers only,*
- (c) is to be sold at a discount of at least 20% of the market value,*
- (d) is to be sold for less than the price cap, and*
- (e) is subject to any restrictions on sale or letting specified in regulations made by the Secretary of State*

'Qualifying first-time buyer' means an individual who—

- (a) is a first-time buyer,*
- (b) is under the age of 40, and*
- (c) has any other characteristics specified in regulations made by the Secretary of State (for example, relating to nationality or minimum age).*

The Broads Authority will monitor progress on the issue of Starter Homes and take this into account as the Preferred Options version of the Local Plan is prepared.

20.13 Evidence that has informed this section:

Central Norfolk SHMA

<http://www.broads-authority.gov.uk/planning/planning->

	policies/development/future-local-plan/evidence-base
Great Yarmouth SHMA (2013)	http://www.great-yarmouth.gov.uk/consumption/groups/publicgybc/documents/article/gybc164973.pdf
PPS7	http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/documents/planningandbuilding/pdf/147402.pdf
Circular 11/95: Use of conditions in planning permission	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7715/324923.pdf
Planning policy for traveller sites, CLG, 2015.	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf
Written Ministerial Statement 2 March 2015.	http://www.publications.parliament.uk/pa/cm201415/cmhansrd/cm150302/wmstext/150302m0001.htm#1503022000006
Planning and Housing Bill.	http://www.publications.parliament.uk/pa/bills/cbill/2015-2016/0075/16075.pdf

20.14 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS18	Core Strategy	
CS24	Core Strategy	
DP4	Development Management	
DP21	Development Management	
DP22	Development Management	
DP23	Development Management	
DP24	Development Management	
DP25	Development Management	
DP26	Development Management	
DIT1	Sites Specifics	
HOR1	Sites Specifics	
HOV1	Sites Specifics	
NOR1	Sites Specifics	
OUL1	Sites Specifics	
OUL3	Sites Specifics	
TSA5	Sites Specifics	
WES1	Sites Specifics	
XNS9	Sites Specifics	

25 Design

21.1 Introduction

The NPPF states:

57. 'It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.'

60. 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.'

NPPG identifies design related planning objectives as:

- local character (including landscape setting);
- safe, connected and efficient streets;
- a network of greenspaces (including parks) and public places;
- crime prevention;
- security measures;
- access and inclusion;
- efficient use of natural resources, and
- cohesive & vibrant neighbourhoods.

Further, the NPPG says that well designed new or changing places should:

- be functional;
- support mixed uses and tenures;
- include successful public spaces;
- be adaptable and resilient;
- have a distinctive character;
- be attractive; and
- encourage ease of movement.

21.2 Building by the Waterside Design Guides

Over the years, the Authority has produced many guides relating to design. Some date back to the late 80s. The Authority is assessing these guides and intends to update and refresh the guides to help developers as they produce their plans. It is intended that the guides will be consulted on early to mid-2016.

21.3 Ensuring Good Design in the Broads

Good design is vital for protecting and enhancing the special character of the Broads. It is also essential for achieving truly sustainable development. The Authority gives design a lot of weight in determining planning applications because of the special qualities of the Broads.

Issue 27: how to address design in the Broads Local Plan

Options	Potential Content	Issues to Consider
Option 1: role forward DP4	<ul style="list-style-type: none"> • As per DP4 and reflecting the NPPG. 	<ul style="list-style-type: none"> • Whilst there is the Design and Access statement that can be required as part of a planning application, trying to negotiate changes to the design at this stage

Options	Potential Content	Issues to Consider
		<p>could be too late to easily influence a scheme.</p> <ul style="list-style-type: none"> That being said, following changes by the Government, very few planning applications need Design and Access Statements now. Applies to all development whereas option 2 relates to large development only.
Option 2: Masterplans for larger development.	<ul style="list-style-type: none"> Require the use of concept statements, design codes or guides or masterplans for development. Emphasise the importance of local distinctiveness as well as sustainable design. 	<ul style="list-style-type: none"> There is potential for some larger developments to come forward as a result of the call for sites. A requirement to produce guides or codes to help guide development could ensure that development and change of these sites is appropriate. Consider including the community in the production of any guide or code. Would need to apply to a threshold. Could relate to site allocation policies. Other larger schemes could come forward outside of the Local Plan during the plan period. Could these require such codes or guides? Could be onerous on developers. Is a design and access statement and policy like DP4 enough? Would relate to large development, but the design of small development is equally important.
Option 3: Policy relating to waterside chalets and homes.	<ul style="list-style-type: none"> Criteria based policy that could stress the importance of keeping the character of these buildings, address the gradual suburbanisation of some areas as well as ensure that buildings continue to be lightweight in character where appropriate. Also refer to the use of materials. 	<ul style="list-style-type: none"> Need to define what this policy would apply to. Would maintain the character of these buildings. Would be related to the guides being produced. Potential to restrict permitted development rights so this policy has more weight.

Many other sections of the Issues and Options Local Plan relate to design, such as:

- Water section – efficiency
- Waste section – bin storage
- Climate Change – checklist
- Sustainable Drainage Systems
- Flood Risk
- Landscape
- Heritage

21.4 Energy Efficiency

In July 2015, the Government announced in ‘Fixing the Foundations: Creating a more prosperous nation’³¹ that *‘The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established’*

Please note that the Deregulation Act 2015³² amends the Planning and Energy Act 2008³³ to say that Local Plans cannot set requirements that go beyond the building regulations. However, there is still the potential for Local Plans to ensure that buildings are designed as sustainably as possible and to require that a reasonable proportion of energy demand is met from renewable or low carbon solutions.

The Authority currently has a policy on energy efficiency in new buildings. Development Management Policy DP7 refers to 10% of a development’s predicted energy requirements being delivered from decentralised, renewable or low carbon resources for major developments. However, experience gained whilst working with the promoters of two large-scale sites in the Broads (Pegasus in Waveney and Ditchingham Maltings in South Norfolk) indicates that it is preferable to take a Fabric First approach. That is to say that the development is designed to reduce energy demand in the first place, then use energy efficient improvements and finally to use renewable energy technologies where appropriate.

Issue 28: How to address energy efficiency in the Local Plan

Options	Potential Content	Issues to Consider
Option 1: Roll forward DP7	<ul style="list-style-type: none"> • Will need to remove reference to the Code for Sustainable Homes as this is no longer in place. • Consideration of reference to BREEAM is required as development meeting the threshold of 1000 sq. m. is very rare in the Broads. 	<ul style="list-style-type: none"> • As written, does not emphasise the Fabric First approach.
Option 2: Policy content refers to Fabric First approach.	<ul style="list-style-type: none"> • Similar in content to DP7 (as amended to reflect cell above). • 10% requirement remains. • Reference to Fabric First approach being preferable to 10% renewable energy. 	<ul style="list-style-type: none"> • Could reduce energy demand of the development. • Could see improvements to lighting, glazing or building fabric. • Supply as much of the remaining energy from efficient, low carbon technologies.

³¹

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443897/Productivity_Plan_print.pdf

³² http://www.legislation.gov.uk/ukpga/2015/20/pdfs/ukpga_20150020_en.pdf

³³ http://www.legislation.gov.uk/ukpga/2008/21/pdfs/ukpga_20080021_en.pdf

Options	Potential Content	Issues to Consider
		<ul style="list-style-type: none"> Offset a proportion of the remaining carbon emissions using renewable energy sources such as PV, solar.

21.5 Residential moorings and associated equipment

In some locations, ancillary development associated with residential moorings (such as a garden shed, fencing or garden furniture) can have an adverse visual effect on the area. The Authority acknowledges that such items (usually called domestic paraphernalia) tend to be related to residential land uses and are desirable by residents. Currently we have policies relating to mooring and leisure plots relating to the scale of development acceptable in certain locations.

Issue 29: How can the Local Plan address the issue of residential items and equipment associated with residential moorings?

Options	Potential Content	Issues to Consider
Option 1: No policy	<ul style="list-style-type: none"> No policy 	<ul style="list-style-type: none"> Such equipment could negatively impact on the special qualities of the Broads if not well designed.
Option 2: Address this through improving the sites specific policies that refer to residential moorings	<ul style="list-style-type: none"> Add a criterion to these policies relating to such equipment being designed in a manner that reflects the setting. Would set out issues to consider. A policy could suggest grouping such items or having communal sites if multiple moorings are permitted. 	<ul style="list-style-type: none"> Whilst these items are not necessarily encouraged, this approach seeks to address such items. Could result in such items being located and designed in a way that respects the special qualities of the area. It is not necessarily about banning such items, but ensuring they are acceptable. If included in the sites specifics policy, would only relate to those areas. But if included in DP25, would be a criterion for all residential moorings.
Option 3: Address this issue by improving DP25.		

21.6 Leisure Plots

The Authority currently has Development Management DPD Policy DP17 that relates to leisure plots. On occasion, the current policy approach could be quite restrictive as there could be some areas around the Broads where some buildings incidental to an existing leisure or mooring use (such as well-designed boat sheds) could be acceptable. There are some policies in the Sites Specifics Local Plan that relate to leisure and mooring plots.

Issue 30: how should we consider leisure plots in the new Local Plan?

Options	Potential Content	Issues to Consider
Option 1: Roll forward DP17	<ul style="list-style-type: none"> As per DP17 	<ul style="list-style-type: none"> Approach could be inflexible. There could be areas where well designed buildings are acceptable.
Option 2: More	<ul style="list-style-type: none"> Criteria based approach that 	<ul style="list-style-type: none"> Would relate to any future design

Options	Potential Content	Issues to Consider
flexible policy approach	<ul style="list-style-type: none"> considers biodiversity, navigation, heritage and culture and landscape impacts. Would also address design issues. 	<ul style="list-style-type: none"> guide. Could encourage inappropriate proposals in terms of design and location.
Option 3: Other site specific policies	<ul style="list-style-type: none"> Similar in content to OUL2 of the Sites Specifics Local Plan. The Authority would need to identify suitable locations. Would need to consider biodiversity, navigation, heritage and culture and landscape impacts. Design an important consideration. 	<ul style="list-style-type: none"> Would highlight locations where such change is suitable. Provides an element of flexibility, but only for certain sites.

The actual definition of leisure and moorings plots can cause confusion. As the Authority produces the Local Plan, the definitions will be clarified.

21.7 Nationally Described Space Standard - optional

The NPPG says:

- Where a local planning authority (or qualifying body) wishes to require an internal space standard, they should only do so by reference in their Local Plan to the Nationally Described Space Standard^[1].
- Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: need, viability, timing.

The Authority is not aware of any evidence that this space standard is appropriate and needed in the Broads Authority Executive Area. As such, the Authority does not intend to adopt the Nationally Described Space Standard.

Q: Do you have any thoughts on space standards? Do you have any evidence that the Authority needs to address this through the Local Plan?

21.8 Accessibility and wheelchair housing standards - optional

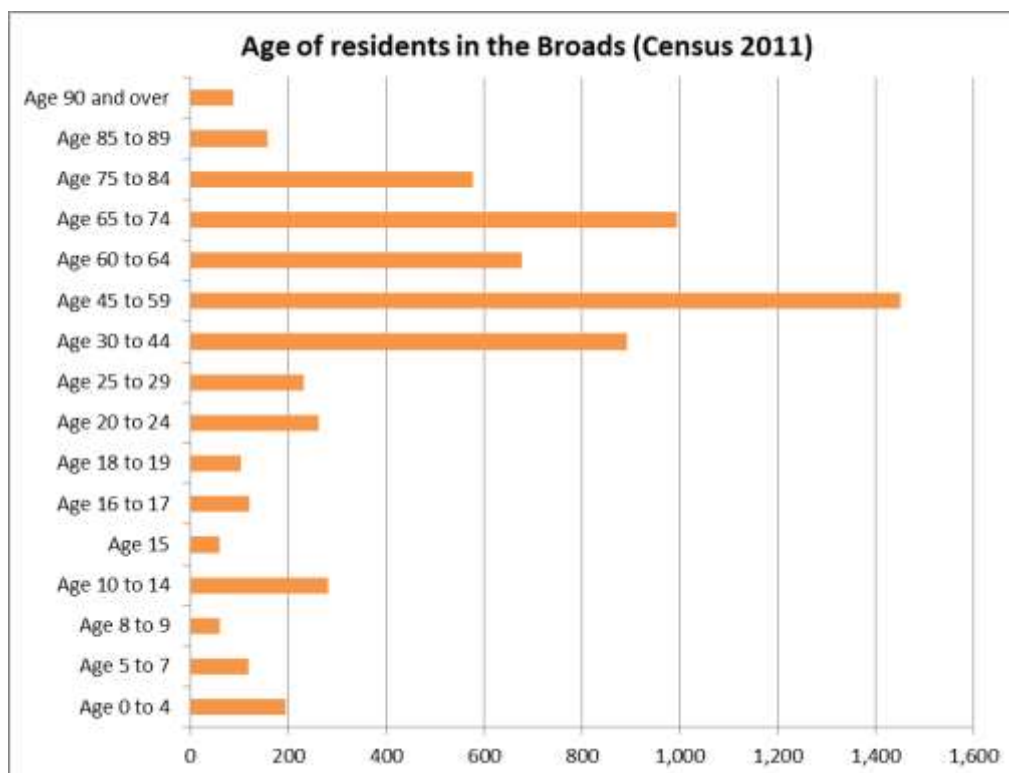
The National Planning Policy Framework (NPPF) is clear that local planning authorities should plan to create safe, accessible environments and promote inclusion and community cohesion.

The NPPG says:

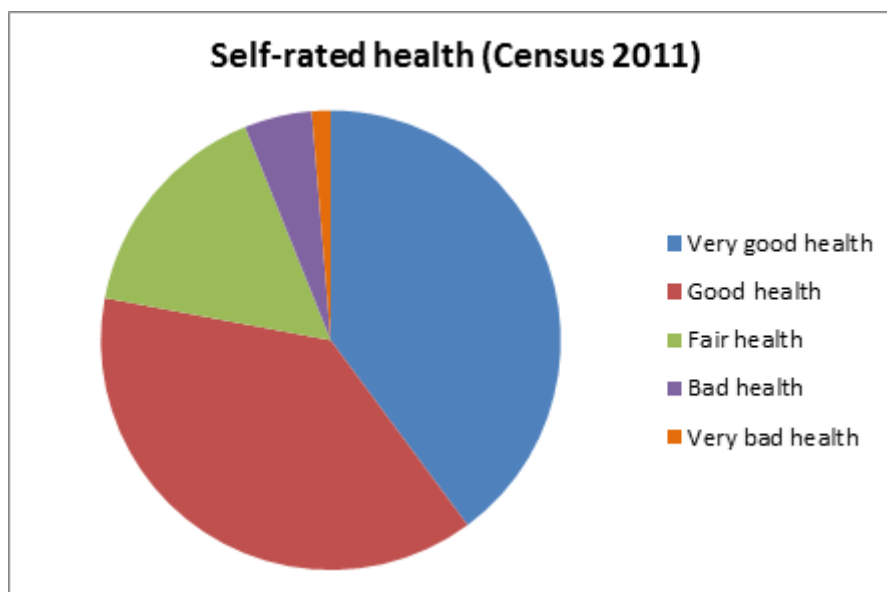
^[1] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/421515/150324_-_Nationally_Described_Space_Standard_Final_Web_version.pdf

Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3)^[2] of the optional requirements in the Building Regulations. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements.

The age profile of the Broads (Census 2011) shows a more elderly population. That being said, the self-declared rating of health (Census 2011) shows that the vast majority have very good, good or fair health and the minority having bad or very bad health. That being said it is acknowledged that someone who needs enhanced access to and within a property may not necessarily have bad health.



^[2] <http://www.planningportal.gov.uk/buildingregulations/approveddocuments/partm/adm/admvol1> and <http://www.planningportal.gov.uk/buildingregulations/approveddocuments/partm/adm/admvol2>



Issue 31: How to address accessibility and wheelchair standards in the Local Plan

Options	Potential Content	Issues to Consider
Option 1: no policy	<ul style="list-style-type: none"> Do not address the optional standards in the Local Plan 	<ul style="list-style-type: none"> The building regulations still enable adaptability of properties without these additional standards.
Option 2: Policy relating to accessibility and wheelchair standards.	<ul style="list-style-type: none"> Incorporate the accessibility and wheelchair standards into the Broads Local Plan. Would include a proportion of dwellings to which this requirement applies. 	<ul style="list-style-type: none"> Viability is a consideration. Unclear if a need exists in the Broads Executive Area. This approach may not be consistent with the constituent district. However the Broads does have an older age profile. This could be easier for the Broads to implement than option 3.
Option 3: Defer to the approach taken by our constituent districts.	<ul style="list-style-type: none"> Policy defers to the approach of the Authority's constituent districts. 	<ul style="list-style-type: none"> Will ensure consistency within the district. The Broads Executive Area has an older age profile so could justify its own policy response. Viability a consideration.

21.9 Evidence that has informed this section

Building at the waterside guides.	Numerous existing guides as well as the future guide.
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21.10 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
DP4	Development Management	
Design quoted in numerous site specific policies.		

26 Sport and Recreation Venues/Buildings

22.1 Introduction

Sports venues make an important contribution to the health and wellbeing of the community. Sports facilities support the development of an active and healthy lifestyle, plus the social benefits derived from engaging in sport and physical activity. Latest figures from Sport England (for the 12 months to March 2015) show that there are 15.49 million adults (aged 16 plus) participating in sport every week. However sports participation numbers have declined since October 2012; 15.9 million people were participating every week.

The NPPF says

28: 'To promote a strong rural economy, local and neighbourhood plans should (inter alia) promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, **sports venues**, cultural buildings, public houses and places of worship'.

77: 'To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should (inter alia) plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, **sports venues**, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments'

74: 'Existing open space, **sports and recreational buildings** and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss'

22.2 Land-Based Sport and Recreation Buildings in the Broads

We define 'sport and recreational buildings' as sports facilities where the public can attend and exercise. Whilst Carrow Road is not open for public access, it is a significant sports facility close to the Broads area and is home to Norwich Community Sports Foundation. Norwich Ski Slope is different in nature to typical sports centres, but is included as it is a large developed structure(s) that provides exercise opportunities. In liaison with the Sports Officers or Planning Policy Officers of our six constituent councils, we have identified the following sport and recreational buildings within or close to the Broads Executive Area.

Area	Within the Broads Executive Area	Close to the Broads
Broadland	None	Acle Sports Centre
Great Yarmouth	Broadland Sports Centre	None
North Norfolk	None	Hickling Barn – Community Gym
Norwich	None	Wensum Lodge Norwich City Football Club Riverside Leisure Centre
South Norfolk	Maltings Meadow Sports Ground, Ditchingham Norwich Ski Slope	YMCA at Trowse
Waveney	None	None

Issue 32: how do we address sport and recreational buildings in the Broads Executive Area?

Options	Potential Content	Issues to Consider
Option 1: Roll forward DIT2.	<ul style="list-style-type: none"> As per DIT2. 	<ul style="list-style-type: none"> Does not consider the other sports facilities in the area.
Option 2: Site specific policies for all sports facilities in the area.	<ul style="list-style-type: none"> As per DIT2. Norwich Ski Slope and Broadland Sports Centre would have their own policy as well. Content could be similar to DIT2. Could reflect aspirations/constraints/specifics of the particular facility. 	<ul style="list-style-type: none"> Discussions with owners of the sports facilities will be required to understand any issues as well as future plans. These facilities offer positive health benefits to the community of the Broads as well as supporting communities outside of the Broads. Similar content could be repeated across three policies.
Option 3: Generic policy relating to indoor sports facilities.	<ul style="list-style-type: none"> Rather than addressing facilities individually, would be a generic policy. Likely to support the continued use as sports facilities. Likely to consider any future changes which could occur at these sites. Likely to be criteria based. 	<ul style="list-style-type: none"> These facilities offer positive health benefits to the community of the Broads as well as supporting communities outside of the Broads. Would be difficult to reflect the site specific qualities of each site in a generic policy.

22.3 Venues/Facilities associated with water-based sport activities.

The use and enjoyment of the water is one of the reasons people come to the Broads. Enabling the safe use of water in appropriate locations is supported in general as it is one of our purposes. There are a wide range of facilities to enable people to get onto the water which range from a small slip-way to enable a canoe to get onto the water to a yacht club with its full range of facilities on offer.

We are aware that infrastructure on land enables the use of water. It is not proposed to have a separate policy that relates to such development as there are other policies that can help guide and determine applications for such infrastructure/development.

22.4 Evidence that has informed this section

NHS Physical Activity Guidelines for adults	http://www.nhs.uk/Livewell/fitness/Pages/physical-activity-guidelines-for-adults.aspx
Greater Norwich Indoor Sports Facilities Strategy for Broadland District, City of Norwich Council and South Norfolk District.	http://www.south-norfolk.gov.uk/planning/media/G8_Greater_Norwich_Indoor_Sports_Strategy_Oct_2014.pdf

22.4 Adopted Policies Relevant to this Chapter

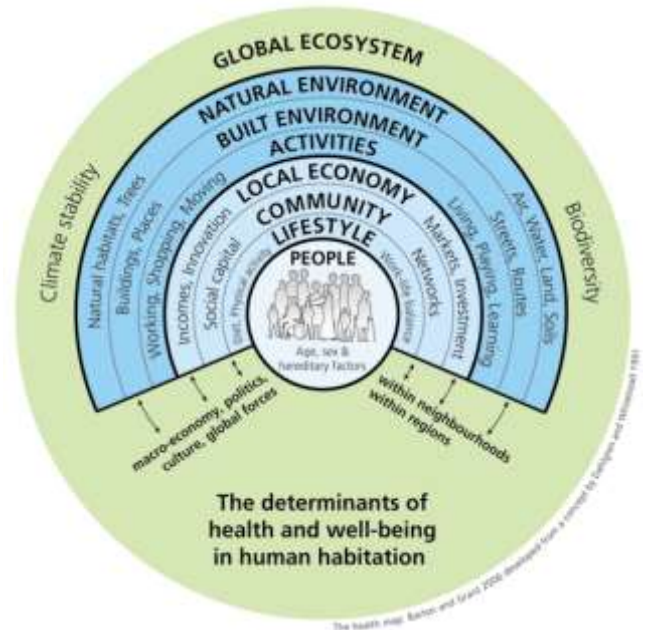
Policy Number	Document	NPPF Compliant?
DIT2	Sites Specifics	

27 Health and Wellbeing

23.1 Introduction

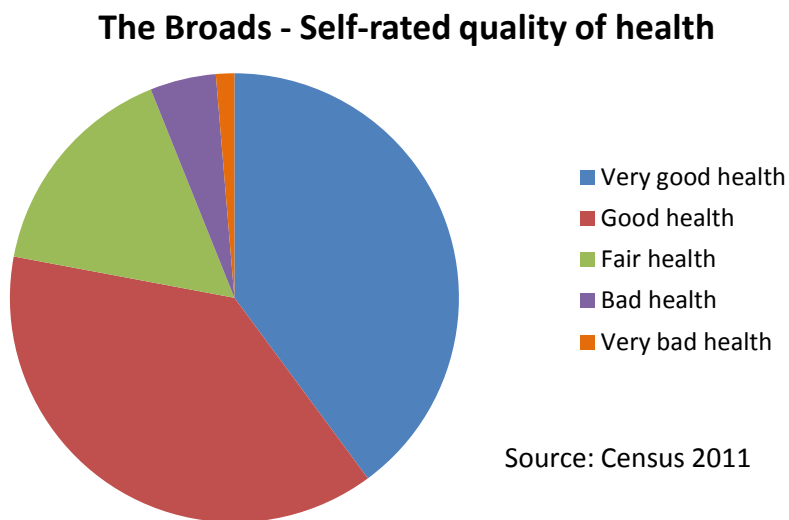
The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. Our health is influenced by a wide range of social, economic and environmental factors.

The Health Map shows how individual determinants including a person's age, sex and hereditary factors are nested within the wider determinants of health which include lifestyle factors, social and community influences, living and working conditions and general socio-economic cultural and environmental conditions.

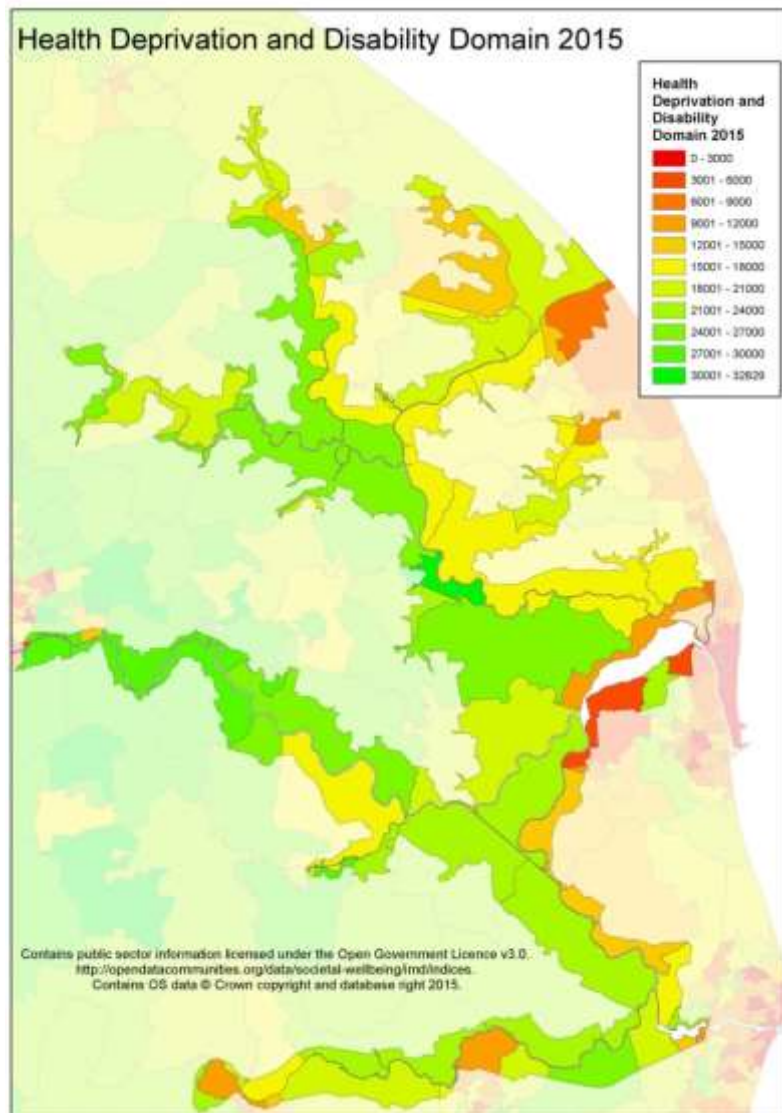


23.2 The Health of the Broads community

The Census 2011 asked people to rate their health. The following chart shows that most people rated their own health as good to very good.



One of the domains of deprivation is the Health Deprivation and Disability domain, which measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation.



23.3 Health, Wellbeing and Planning

So there is a clear link between planning and health. Indeed, the Government are clear in the role of health and wellbeing in planning stating that *'local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making'* (NPPG). Further, the NPPG defines a healthy community as:

A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage:

- *Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.*
- *The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.*

The NPPG identifies the range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure:

- *development proposals can support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital;*
- *the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities;*
- *the local plan considers the local health and wellbeing strategy and other relevant health improvement strategies in the area;*
- *the healthcare infrastructure implications of any relevant proposed local development have been considered;*
- *opportunities for healthy lifestyles have been considered (e.g. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces and opportunities for play, sport and recreation);*
- *potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and*
- *access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted.*

It is important to note that other sections of this Issues and Options document are all relevant to a healthy community. For example tranquillity, amenity, sport and recreation, pollution and housing need all have an impact on an individual's health and wellbeing.

23.4 Health benefits of using the Broads

The second of the Broads Authority's statutory purposes is 'promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public'. As such, the Broads is an area for formal and informal recreation that benefits mental and physical wellbeing.

The types of physical activities typically undertaken in the Broads area include walking, cycling, canoeing, rowing, sailing, supervised open water swimming at Whitlingham Lake, paddle boarding, water skiing and active volunteering opportunities (such as land clearance).

The Broads is also known for its tranquillity, landscape and biodiversity which can all benefit mental wellbeing, whether one is active in the Broads or simply experiencing it.

23.5 Designing Places for Healthy Lives

The Design Council has drawn on the growing body of evidence to identify four principles of healthy place-making: functions of health that can be designed into a building, street, public space, neighbourhood or city, and which planning policy can establish a framework and requirement for. The Design Council intend to provide more information on this in a publication in due course.



Issue 33: How can we design places for healthy lives?

Options	Potential Content	Issues to Consider
Option 1: No policy.	<ul style="list-style-type: none"> No policy. 	<ul style="list-style-type: none"> Rely on NPPF. No local approach to seeking to improve health and wellbeing of the Broads community.
Option 2: Designing places for healthy lives checklist.	<ul style="list-style-type: none"> Checklist completed by applicants to accompany applications to show how they have designed in physical activity, healthy food, contact with nature and positive social contact. Would address various aspects of physical activity such as walkable neighbourhoods, ability to cycle to facilities and services as well as play, open space and allotments. Could reflect learning from the One Norfolk bid (if successful). 	<ul style="list-style-type: none"> Would require a threshold. Would apply to certain types of development, such as tourist attractions and residential development. Some developers might consider this onerous to complete. Who would assess this when submitted with applications? Could ensure that physical activity is considered as developments are built and designed and result in the visitors to the Broads and the community having healthier lives. Would help maintain and improve the fairly positive levels of health and wellbeing of residents. Could be difficult to quantify or specify what makes a development healthy in practice.

23.6 Health Facilities

NHS England is not currently aware of a specific need for additional health facilities within the Broads Executive Area. There is currently sufficient capacity to cope with the existing populations in the area. Additionally there is not at present, due to capacity reasons, a need to expand the health facilities outside the Broads Executive Area into the Broads Executive Area.

Should housing or population growth increase from the current levels, NHS England in conjunction with the relevant Clinical Commissioning Groups (CCGs) would need to review the growth or projected growth to ensure that suitable facilities are available to meet the needs of patients within the areas. Where significant growth occurs, this could result in the requirement of future expansion of existing premises or the procurement of new facilities. Discussions would take place with existing practices. A business case would need to be reviewed based upon the information and proposals at the time.

Where significant housing growth is planned the NHS would be looking to secure appropriate Section 106 and or CIL contributions to assist in mitigating the cost of providing such additional health infrastructure.

At this stage, it is not proposed to have a specific policy on health facilities.

Q: Do you have any thoughts on our position on this matter?

23.7 The Norfolk 'HUDU'³⁴ model

The Norfolk HUDU model provides estimates, based on different housing growth scenarios, for the additional health care needs required in Norfolk and Waveney to 2036 to take account of projected growth. The figures are high level and contribute to understanding the potential strategic needs for CCG areas, and are not intended to set requirements for specific developments.

At the time of writing, this was available in draft format and was due to be consulted on during November. The Broads Authority will work with other parties to fully understand the needs of the proposed housing numbers for Norfolk and Waveney.

23.8 Health Assessment of the Local Plan

As the Local Plan for the Broads is produced, the Authority will work with health experts to assess each policy in relation to health and wellbeing. For the Issues and Options version, this will be completed during the consultation period. It is intended for subsequent versions, that this will be completed prior to consultation.

The aim of this assessment is to ensure that the policies of the Local Plan will contribute to the positive health and wellbeing of the community and users of the Broads.

23.9 NHS Healthy New Towns Bid

At the time of writing, the Local Planning Authorities of Norfolk have bid for funding as part of the NHS Healthy New Towns bid. The NHS will work with selected areas to redesign local health and social care services.

The programme has three core objectives:

³⁴ The Healthy Urban Development Unit (HUDU) Planning Contributions Model is a comprehensive tool to assess the health service requirements and cost impacts of new residential developments. The model is licensed by HUDU for use within the NHS. <http://www.healthyurbandevelopment.nhs.uk/our-services/delivering-healthy-urban-development/hudu-model/>

- a) To develop new and more effective ways of shaping new towns, neighbourhoods and strong communities that promote health and wellbeing, prevent illness and keep people independent;
- b) To show what is possible when we radically rethink how health and care services could be delivered, freed from the legacy constraints (i.e. existing services) that operate in other areas. This will support the New Models of Care programme by adding to the learning about how health and care services could be integrated to provide better outcomes at the same or lower cost;
- c) To accomplish the first two objectives in a way that can be replicated elsewhere, making learning available to other national programmes as well as other local areas.

The 'One Norfolk' bid seeks funding to ensure that five main schemes around Norfolk consider health and wellbeing through their development. Whilst this is not directly of relevance to the Broads, being a Norfolk-wide bid, there is scope for the learning and practice from this work to be applied to development around the Broads.

Please note that the sections of this Issues and Options on open space, play, allotments and active transport all contribute to the health and wellbeing of the community and visitors of the Broads.

23.10 Evidence that has informed this section

'Fair Society Healthy Lives' (The Marmot Review) 2010. Census 2011	http://www.instituteofhealthequity.org/projects/fair-society-healthy-lives-the-marmot-review http://www.ons.gov.uk/ons/guide-method/census/2011/index.html?utm_source=twitterfeed&utm_medium=twitter
Indices of Multiple Deprivation 2015	https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015
Active by Design (Design Council, 2015)	http://www.designcouncil.org.uk/projects/active-design
Planning in Public Health An engagement protocol between local planning authorities and Public Health in Norfolk	

23.11 Adopted Policies Relevant to this Chapter

There are no relevant adopted policies.

28 Education

24.1 Understanding the Broads

The second of the Authority's statutory purposes is to promote opportunities for understanding and enjoyment of the special qualities of the Broads by the public.

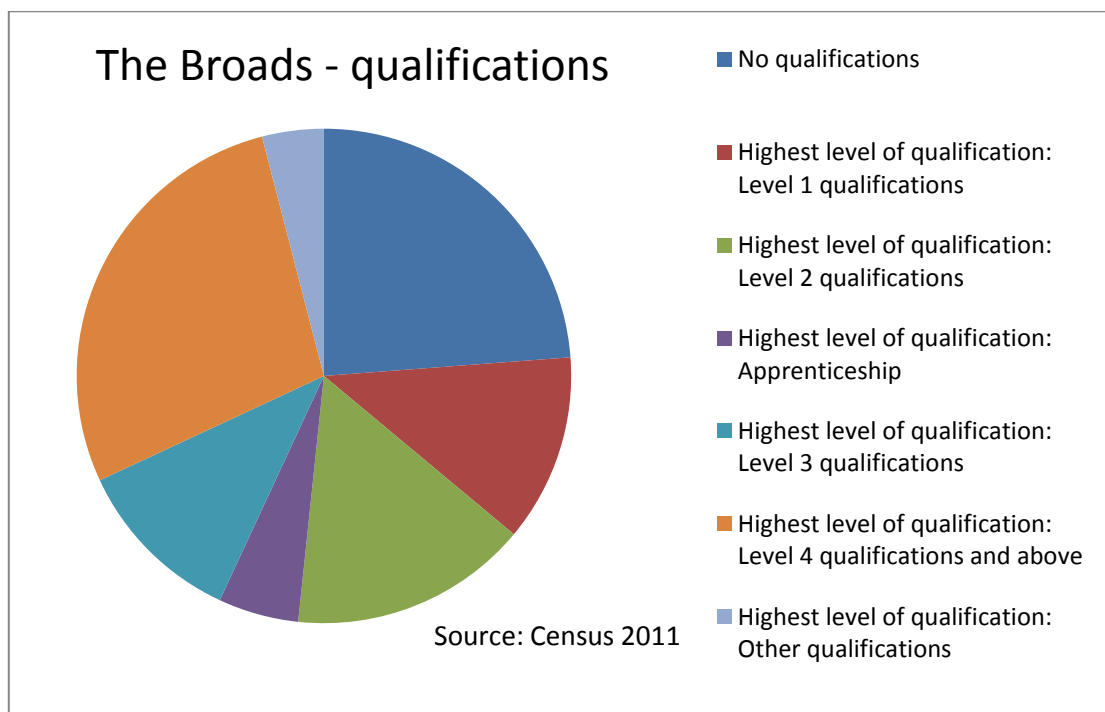
The Broads Authority employs an Education Officer and one of the objectives of the Education Strategy is to develop educational partnerships that together work to provide every child within five kilometres of the Broads Executive Area with a 'Broads experience' at some time in their school career.

The desired outcome of the Authority's environmental education work is that more people, from a wide range of backgrounds, will have a better understanding of the special qualities of the Broads; and as a result will value the Broads as a rich source of enjoyment, personal development and wellbeing; and behave in a way that ensures that the special qualities of the Broads are managed sustainably now and for future generations.

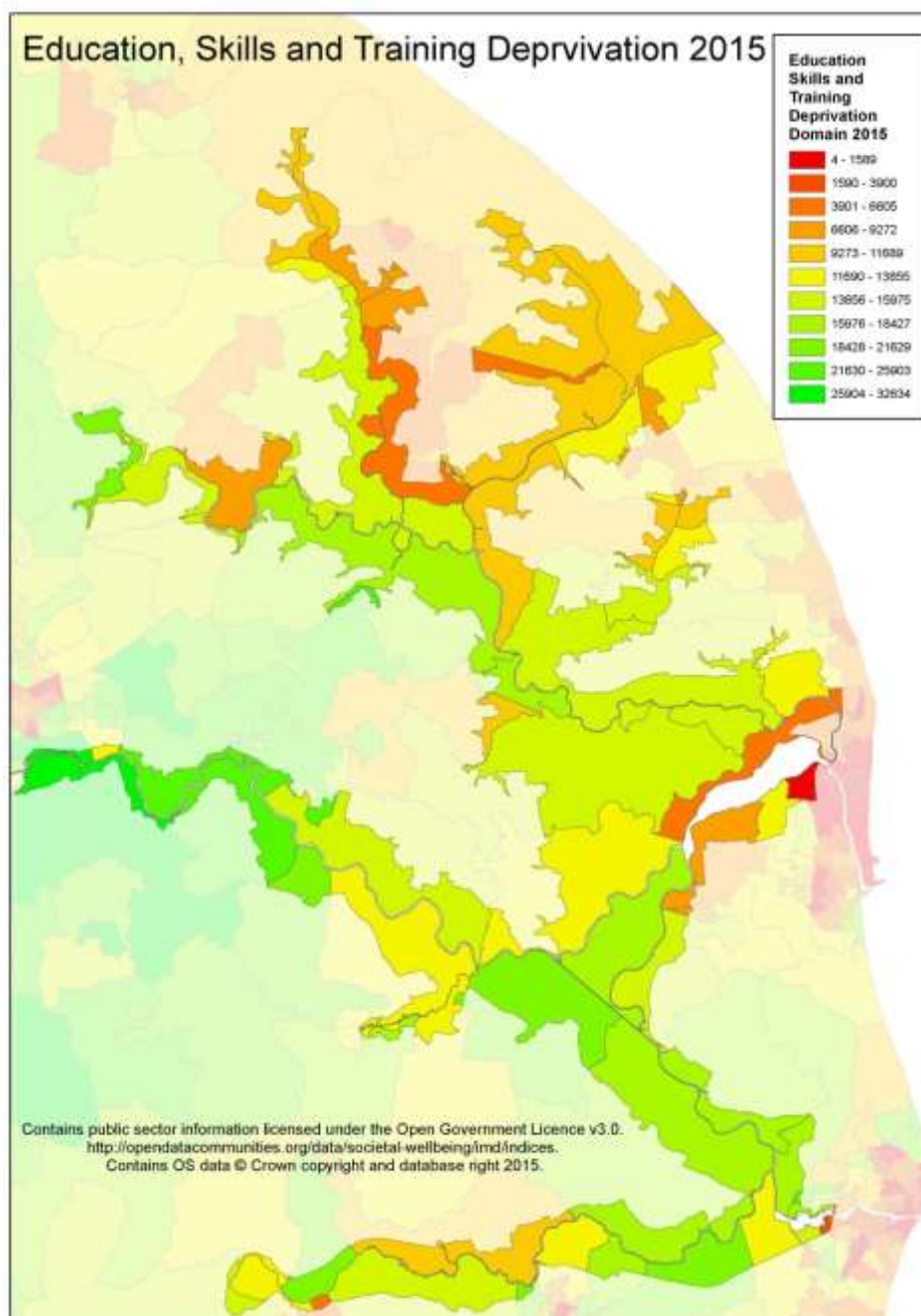
The Broads Authority also undertakes study work, either on its own or in partnership, to better understand the Broads. There are annual water plant and Bittern surveys as well as specific projects, such as cuckoo tagging.

24.2 The Broads Community and Education and Skills

The Census 2011 assesses the highest qualification attained by the community. The chart below shows that around a third of the community of the Broads has level 1 or no qualification, but also around a third of the population have level 3 or 4 qualifications. Level 1 includes less than 4 GCSE or equivalent and Level 4 includes degrees.



The Education, Skills and Training Deprivation Domain measures the lack of attainment and skills in the local population. Areas are ranked from least deprived (green) to most deprived (red)



24.3 Education establishments

The NPPF says:

37. 'Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, **education** and other activities.'

72. 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- **give great weight to the need to create, expand or alter schools; and**

- *work with schools promoters to identify and resolve key planning issues before applications are submitted.'*

Discussions with Suffolk and Norfolk County Councils indicate that there is not likely to be a requirement for any schools to expand into the Broads Authority Executive Area in this plan period. We will liaise with the Education Authorities in future versions of the Local Plan regarding any residential allocations proposed in response to meeting the Objectively Assessed Housing need. Future development proposals will be assessed as they emerge and seek S106 developer contributions if justified and satisfy the CIL 122 Regulations. At this stage, it is not proposed to have a specific policy on education establishments.

Q: Do you have any thoughts on our position on this matter?

24.7 Evidence that has informed this section

Action Plan for the Reed and Sedge Cutting Industry May 2012.	http://www.broads-authority.gov.uk/_data/assets/pdf_file/0019/416413/Action_Plan_for_the_Reed_and_Sedge_Cutting_IndustryMay2012.pdf
Broads Authority Education Strategy 2012-2016	http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/474486/Education-Strategy-2012-2016.pdf

24.8 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
DP27	Development Management	
DP30	Development Management	

29 Waste and Minerals

19.1 Introduction

The NPPF states:

'142. Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation.'

The National Planning Policy for Waste states:

'Positive planning plays a pivotal role in delivering this country's waste ambitions'

Unlike other members of the National Park family, the Broads Authority is not the Minerals and Waste Authority for its area. Norfolk and Suffolk County Councils undertake those roles.

19.2 Norfolk Waste and Minerals Documents

The Norfolk Core Strategy and Minerals and Waste Development Management Policies DPD 2010-2026 (the 'Core Strategy') was adopted in September 2011. The Norfolk Minerals Site Specific Allocations DPD and the Norfolk Waste Site Specific Allocations DPD were both adopted in October 2013. The Core Strategy will be reviewed five years after adoption; by the end of 2016. The Minerals Site Specific Allocations DPD and the Waste Site Specific Allocations DPD will also be reviewed five years after adoption; by the end of 2018.

A Single Issue Silica Sand Review of the Minerals Site Specific Allocations DPD is currently being carried out. The silica sand resource in Norfolk is only located in the west of the county and therefore the Silica Sand Review does not affect the Broads Authority.

Policy CS17 covers the use of secondary and recycled aggregates and would be relevant to any policy in the Broads Authority Local Plan regarding sustainable design. In addition, Policy CS16 in the Minerals and Waste Core Strategy covers safeguarding of certain minerals extraction and waste management facilities and mineral resources. The following table identifies the safeguarded mineral sites and waste management sites (including waste water treatment works) where either the site itself or the consultation area for the site falls within the Broads Authority Executive Area.

SITE NAME	OPERATOR	TYPE
Acle	Anglian Water Services Ltd	Wastewater Consultation Area
Acle	Anglian Water Services Ltd	Wastewater
Aldeby	Waste Recycling Group	Waste management site Consultation Area
Belaugh	Anglian Water Services Ltd	Wastewater Consultation Area
Belaugh	Anglian Water Services Ltd	Wastewater
Caister	May Gurney	Waste management site Consultation Area
Earsham	Earsham Gravels Ltd	Mineral extraction site Consultation Area
Earsham	Earsham Gravels Ltd	Mineral extraction site
Great Yarmouth A	M T Skips	Waste management site Consultation Area

SITE NAME	OPERATOR	TYPE
Great Yarmouth-MT Skips	M T Skips	Waste management site
Heckingham / Norton Subcourse	Cemex	Mineral extraction site Consultation Area
Horning	Anglian Water Services Ltd	Wastewater Consultation Area
Horning	Anglian Water Services Ltd	Wastewater
Norton Subcourse	Cemex	Mineral extraction site Consultation Area
Stalham	Anglian Water Services Ltd	Wastewater Consultation Area
Stalham	Anglian Water Services Ltd	Wastewater
Trowse	Lafarge Aggregates Ltd	Mineral Infrastructure Consultation Area
West Caister	Norfolk County Council	Waste management site Consultation Area
West Caister	Anglian Water Services Ltd	Wastewater Consultation Area
Whitlingham	Anglian Water Services Ltd	Wastewater Consultation Area

19.3 Suffolk Waste and Minerals Documents

The Waste Core Strategy including Development Management Policies was adopted in March 2011. The County Council will be likely to review the above document not earlier than the end of 2017. Waste Core Strategy does not propose any minerals or waste sites in the Broads area. In addition, there are no existing waste or minerals management facilities in the Broads.

The Minerals Core Strategy was adopted in September 2008. The Minerals Specific Site Allocations document was adopted in September 2009. Some areas of the Broads are falling into the minerals consultation areas and therefore Minerals Core Strategy Policy 5 (Safeguarding mineral resources) is relevant here and needs to be considered in the Local Plan.

To ensure conformity with the national legislation, the County Council plans to undertake a review of the current Minerals Local Plan and anticipates extending the Plan period up to 2031.

The Suffolk Waste Partnership (SWP) is currently in the early process of developing a waste Supplementary Planning Document (or similar document should another approach be preferable) with the support of the Suffolk Joint Planning Officer Group. The aims of the document are provisionally as follows:

- To create a unified pan-Suffolk set of waste service requirements for incorporation into any future planning process.
- To embed the waste hierarchy into the planning process.
- To allow the SWP a mechanism to discuss alterations from the standard service model with housing developers.

19.4 Waste

The NPPG states:

While such authorities may not have the planning functions in respect of the preparation of Local Plans covering waste, or dealing directly with waste planning applications, they must have regard to national planning policy for waste and are expected to help deliver the Waste Hierarchy. This might include:

- *working constructively with waste planning authorities to identify and protect those sites needed for waste management facilities. Local planning authorities should consider the need for waste management alongside other spatial planning objectives.*
- *integrating local waste management opportunities in proposed new development*

- considering, where relevant, the likely impact of proposed, non-waste related development on existing waste management sites and on sites and areas allocated for waste management
- promoting sound management of waste from any proposed development, such as encouraging on-site management of waste where this is appropriate, or including a planning condition to encourage or require the developer to set out how waste arising from the development is to be dealt with
- including a planning condition promoting sustainable design of any proposed development through the use of recycled products, recovery of on-site material and the provision of facilities for the storage and regular collection of waste
- ensuring that their collections of household and similar waste are organised so as to help towards achieving the higher levels of the waste hierarchy.

The NPPG also states:

Unightly bins can damage the visual amenity of an area. Carefully planned bin storage is, therefore, particularly important. Local authorities should ensure that each dwelling is carefully planned to ensure there is enough discretely designed and accessible storage space for all the different types of bin used in the local authority area (for example landfill, recycling, food waste).

Issue 21: how to address waste in the Broads Local Plan

Options	Potential Content	Issues to Consider
Option 1: no policy	<ul style="list-style-type: none"> • No policy. 	<ul style="list-style-type: none"> •
Option 2: Require waste statement as part of planning applications.	<ul style="list-style-type: none"> • Require developer to explain how waste arising from their development will be dealt with. • Would address construction waste and future household waste. 	<ul style="list-style-type: none"> • Likely to require a threshold as well as identify to which development type this policy addresses. • Could be seen as onerous to the developer. • Who would assess the statement? • Developers would need to demonstrate that they meet the requirements of the waste authority in relation to bin storage and access by refuse vehicles.
Option 3: policy relating to carefully planned bin storage.	<ul style="list-style-type: none"> • Ensure well designed and discrete and accessible storage space. • 	<ul style="list-style-type: none"> • Liaise with individual districts to understand their specific bin types. • Would seek to protect the important landscape, streetscape and townscape of the Broads. • Would seek to protect views from the river and other sensitive viewpoints. • Would help new residents with storage of bins. • Developers would need to demonstrate that they meet the requirements of the waste authority in relation to bin storage

Options	Potential Content	Issues to Consider
		<p>and access by refuse vehicles.</p> <ul style="list-style-type: none"> • Could encourage and facilitate recycling.

19.5 Minerals

The NPPG states:

What is the role of the district council, as the local planning authority, in safeguarding minerals?

Whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in three ways:

- *having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps;*
- *in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and*
- *when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.*

The current Site Specifics policies refer to relevant county council policies in relation to safeguarded sites where minerals are identified on that site. In formulating site allocation policies, the Authority will work with Norfolk and Suffolk County Council to identify any land that is safeguarded for minerals.

19.6 Evidence that has informed this section

Norfolk County Council minerals and waste documents.	http://www.norfolk.gov.uk/Environment/Planning/Minerals_and_waste_planning_policy/index.htm
Suffolk County Council minerals and waste documents.	http://www.suffolk.gov.uk/planning-and-environment/planning-applications/minerals-and-waste-development-planning/

19.7 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS7	Core Strategy	
DP4	Development Management	
DP25	Development Management	
DP26	Development Management	
DP30	Development Management	
Numerous site specific policies relate to safeguarded mineral sites and also waste sites.		

30 Safety by the Water

30.1 Introduction

The Broads is primarily a water based area where many people enjoy being in, on or around the water so we need to consider the issue of safety by the water. Fatalities in the Broads are rare, however they do occur and each year there are occurrences where people fall into the water. On a hot day, the cool water of the Broads is often an attraction to swimmers. The area is also popular for organised wild and open water swimming groups. People sail/row on the Broads using stand-up paddle boards, canoes, sailing boats and motorised cruisers. People also walk alongside waterways in the Broads as well as enjoy the many open spaces or pubs and cafes next to 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.

30.2 The Issue

There is no legislation to govern the provision of safety equipment. There are guides which the Authority directs potential developers of waterside development towards. On occasion, the Authority adds conditions to planning permissions relating to development near the waterside (usually moorings) to ensure the provision of a means of getting out of the water in any tidal condition (usually ladders and grab fixtures).

We would like to explore the possibility of enshrining safety by water in planning policy and would welcome your views.

Typical safety features which this section relates to are:

- Way of getting out of the water.
- Chain, rail or similar structure that someone in the water can grab onto in any tidal conditions.
- Lifebuoys or unlocked throw lines

Issue 42: how should we consider safety by the water in the new Local Plan?

Options	Potential Content	Issues to Consider
Option 1: No Policy	<ul style="list-style-type: none"> • No specific policy. 	<ul style="list-style-type: none"> • Issue is covered in the Moorings Guide. But that only relates to moorings. There are other water-side development types. • Continue as we currently do – relying on conditions. • Would not see a standardised provision of safety features in new development.
Option 2: Guidance	<ul style="list-style-type: none"> • Would cover the types of water-side development and what types of safety features are appropriate. • Could address distances between such equipment and the design and maintenance. • Could be linked to a policy. 	<ul style="list-style-type: none"> • Could result in a standardised provision of safety features in new development. • This will place a cost burden on the developer.

Options	Potential Content	Issues to Consider
Option 3: Policy covering detail of safety equipment to be provided at different developments	<ul style="list-style-type: none"> • Would relate to water-side development. • Would require applicants to show how they have considered waterside safety in their development. • Could link to the guidance. 	<ul style="list-style-type: none"> • Could result in a standardised provision of safety features in new development. • Could require a threshold and also apply to certain types of development. • This will place a cost burden on the developer.

30.3 Evidence that has informed this section

Free Health and Safety Executive code of practice	http://www.hse.gov.uk/pubns/priced/l148.pdf
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30.4 Adopted Policies Relevant to this Chapter

No adopted policies relate to the specific issues raised in this chapter. However, all policy documents refer to safety of the public, but usually in reference to highways.

31 Developer Contributions/Planning Obligations

31.1 Introduction

Developer contributions (also referred to as Planning Obligations) assist in mitigating the impact of development which benefits local communities and supports the provision of local infrastructure.

The NPPF states:

'203. Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition'

The main types are the Community Infrastructure Levy and Section 106 agreements.

The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. The landowner is responsible for paying it and the local planning authority is the charging authority (and sets the CIL). In essence, CIL:

- Charge is £ per square metre on net additional (internal) floorspace
- Rates can vary by geographic area or use or size
- Payment is due when the development starts (or phases or instalments- the charging authority decides)
- Is index linked (using BCIS index – only available through RICS)

The Broads Authority has not introduced a CIL, due to the low levels of development, difficulties involved in identifying specific Broads infrastructure and the costs of collecting and monitoring CIL when balanced against the sums likely to be generated.

S106 contributions are private agreements negotiated between local planning authorities and developers to mitigate the impact of development. For example, planning obligations might be used to prescribe the nature of development (e.g. by requiring that a given proportion of housing is affordable); or to secure a contribution from a developer to compensate for loss or damage created by a development (e.g. loss of open space); or to mitigate a development's impact (e.g. through increased public transport provision).

As of April 2015 there are restrictions on the pooling of planning obligations. Now, local authorities can no longer pool more than five S106 obligations together (dating back to March 2010) to pay for a single infrastructure project or type of infrastructure.

It is important to consider the following in relation to Developer Contributions:

- Developer contributions need to be necessary to make the development acceptable in planning terms, directly related to the development and be fairly and reasonably related in scale and kind to the development.
- The combined total impact of contributions should not threaten the viability of the scheme.
- There are pooling restrictions on S106 contributions whereby only five contributions can be sought towards generic types of infrastructure.

31.2 The Broads Local Plan and Developer Contributions

Other parts of the Issues and Options are relevant to developer contributions. Open space, affordable housing, education and health are the issues to which developer contributions can typically relate to.

The NPPG states:

'Policies for seeking planning obligations should be set out in a Local Plan; neighbourhood plan and where applicable in the London Plan to enable fair and open testing of the policy at examination.'

The Authority intends to roll forward DP30 of the Development Management DPD, subject to a general refresh to reflect current guidance and national policy.

Q: What are your thoughts on rolling forward DP30?

As and when the Authority receives developer contributions, how do you think we should spend the funding? Some examples of how to spend developer contributions include moorings, community facilities, play areas and public access. The Authority is interested in your views.

Q: What are your priorities for developer contributions and why?

31.3 Evidence that has informed this section

Norfolk County Council Planning Obligations Standard 2015	http://www.norfolk.gov.uk/environment/planning/planning_obligations/index.htm
Section 106 Developers Guide to Infrastructure Contributions in Suffolk – February 2013 revision	https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/20140423_S106_Developers_Guide_to_Infrastructure.pdf

31.4 Adopted Policies Relevant to this Chapter

Policy Number	Document	NPPF compliant?
CS21	Core Strategy	
DP23	Development Management	
DP30	Development Management	

32 Site-Specific Policies

32.1 Introduction

In addition to the sites in the adopted Sites Specifics Local Plan, there could be site-specific policies that address these areas. We welcome your thoughts.

32.2 Horning – car park

The car park to the west and south of Staithe and Willow (on Lower Street near the Village Green) is currently marked on the adopted policy map for Horning as open space. However, being a car park that is popular and well used, it seems prudent to protect it in a similar way to existing Sites Specifics policy HOR2 (the Lower Street car park).

Issue 43: how do we protect the car parking area near Staithe and Willow?

Options	Potential Content	Issues to Consider
Option 1: no specific policy (other than removing the open space allocation)	<ul style="list-style-type: none"> The policies map would be amended to remove the open space symbol from this area. 	<ul style="list-style-type: none"> Any application would be considered using the generic policies. The car parking would benefit from its own policy.
Option 2: Protect this parking area in a similar way to the existing HOR2 policy.	<ul style="list-style-type: none"> The policies map would be amended to remove the open space symbol from this area. Could be its own policy or combined with the existing HOR2. The criteria for the main car park off Lower Street could be applied to this smaller car parking area. 	<ul style="list-style-type: none"> The car parking is an accepted use in this area and is well used. Would clarify the land uses in this area and related policies.

32.3 Thorpe Island

The Thorpe Island policy in the 1997 Local Plan permitted some development associated with the boatyard at the eastern end of the site, but no development at the western end. An unauthorised mooring use commenced in 2009 and in 2011 Enforcement Notices were served requiring the cessation of the use. An appeal was submitted and in October 2014 a Planning Inspector allowed the mooring of up to 25 boats, subject to a number of specific conditions. The conditions were not complied with and in January 2015 the permission lapsed. The decision of the Planning Inspector is currently under challenge and the outcome of this is expected in February 2016.

Issue 44: how to address Thorpe Island in the Local Plan?

Options	Potential Content	Issues to Consider
Option 1: roll forward TSA2 from the 1997 Local Plan.	<ul style="list-style-type: none"> As per TSA2 of the 1997 Local Plan. 	<ul style="list-style-type: none"> Has been used in appeals and High Court challenges. Is from 1997 Local Plan.
Option 2: A refreshed criteria based policy.	<ul style="list-style-type: none"> Based on TSA2 but updated. Would reflect the various decisions relating to this island. 	<ul style="list-style-type: none"> Would provide an updated policy that reflects recent decisions.

32.4 Ferry Corner, Horning

There are four live/work units at Ferry Corner, in a prominent location on the route from Horning, of high quality. There are workshops on the ground floor with two floors of residential accommodation on the upper two floors. The units benefit from moorings as well as ample off street car parking. At the time of writing (May 2015), permitted uses of the units include A1, A2, A3, B1 and B2 on the lower levels, with residential accommodation for employees on the upper levels.

The site was developed in the early 2000s and until recently was vacant. Planning applications in the past have sought change of use to purely residential, but it was found that the units were marketed at unrealistic prices and the site is outside of the development boundary. On adjustment of the prices of the accommodation, in mid-2015 three out of the four units were occupied by businesses in accordance with the planning permission for the site.

The Authority recognises that this development is of high quality, offers employment opportunities as well as residential (linked to the employment) and offers parking and moorings.

Issue 45: do we protect the live/work units at Ferry Corner through the Local Plan and if so, how?

Options	Potential Content	Issues to Consider
Option 1: no specific policy	<ul style="list-style-type: none"> No policy 	<ul style="list-style-type: none"> Any application would be considered using the generic policies.
Option 2: a site-specific policy that reflects current permission.	<ul style="list-style-type: none"> Allow uses in line with the current planning permission only. Current land use class that are acceptable are A1, A2, A3, B1, B2. 	<ul style="list-style-type: none"> This recognises that this development is a high quality development that provides employment and residential with parking and moorings. Retains employment use in this area. When marketed at a realistic price, this development is desirable.
Option 3: a site – specific policy that expands what is acceptable at this site.	<ul style="list-style-type: none"> Allow a mix of uses of the site such as market housing, affordable housing, and holiday let and live/work units. i.e. expanding what is acceptable beyond solely live/work units. 	<ul style="list-style-type: none"> Could lose the employment element of the development. Now marketed at realistic price, they are popular and three out of four have been let. Issue of policy approach being flexible if market changes again. Any change of use would need to be subject to viability.

32.5 Other sites

Site and Settlement	Description
Beccles Old Hotel Site, opposite Morrison's	This site, on the outskirts of Beccles, had consent for a hotel, which has now lapsed. The hotel was not built. The site was allocated in the 1997 Local Plan for a hotel but this allocation was not rolled forward in the Sites Specifics Local Plan. This reflects

Site and Settlement	Description
	the constraints on the sites which are mainly access and flood risk. The current open and green site is prominent at the gateway to Beccles.
Bridge Hotel, Potter Heigham	Built in 1869 this hotel burnt down in 1991. The site has had a series of temporary consents for car parking.
Little Precinct in Hoveton	This is one of the few retail areas in the Broads Executive Area (see the retail section). There are around 10 units along the precinct. Current occupiers include a bank, a Post Office, some gift shops and convenience shops. There is street furniture such as benches and bins. The upper floors are office space.
Former Waterside Rooms at Hoveton	This is a former pub site, where the building has been closed since the mid 1980's and is currently boarded up. It is in poor condition and impacts adversely on the waterfront and the streetscape. The current building is likely to be unsuitable for renovation.
Former Loaves and Fishes Pub at Beccles	This is a former pub site, where the building has been closed since the mid 1990's. It occupies an attractive location to the rear of Beccles Quay.

Q: What are your thoughts on these sites? Are there any changes you would like to see and why? Are there any other areas similar to those listed that you would like to propose for inclusion in the Local Plan?

32.6 Adopted Policies Relevant to this Chapter

All policies in the Sites Specifics Local Plan, 2014.

33 Conclusion

This Issues and Options document has considered what the Authority considers are currently the key issues to address in the Local Plan. You may have thoughts on these issues and the broad options. You may also consider there to be other issues that the Authority should look into. We look forward to hearing from you with your thoughts and comments.

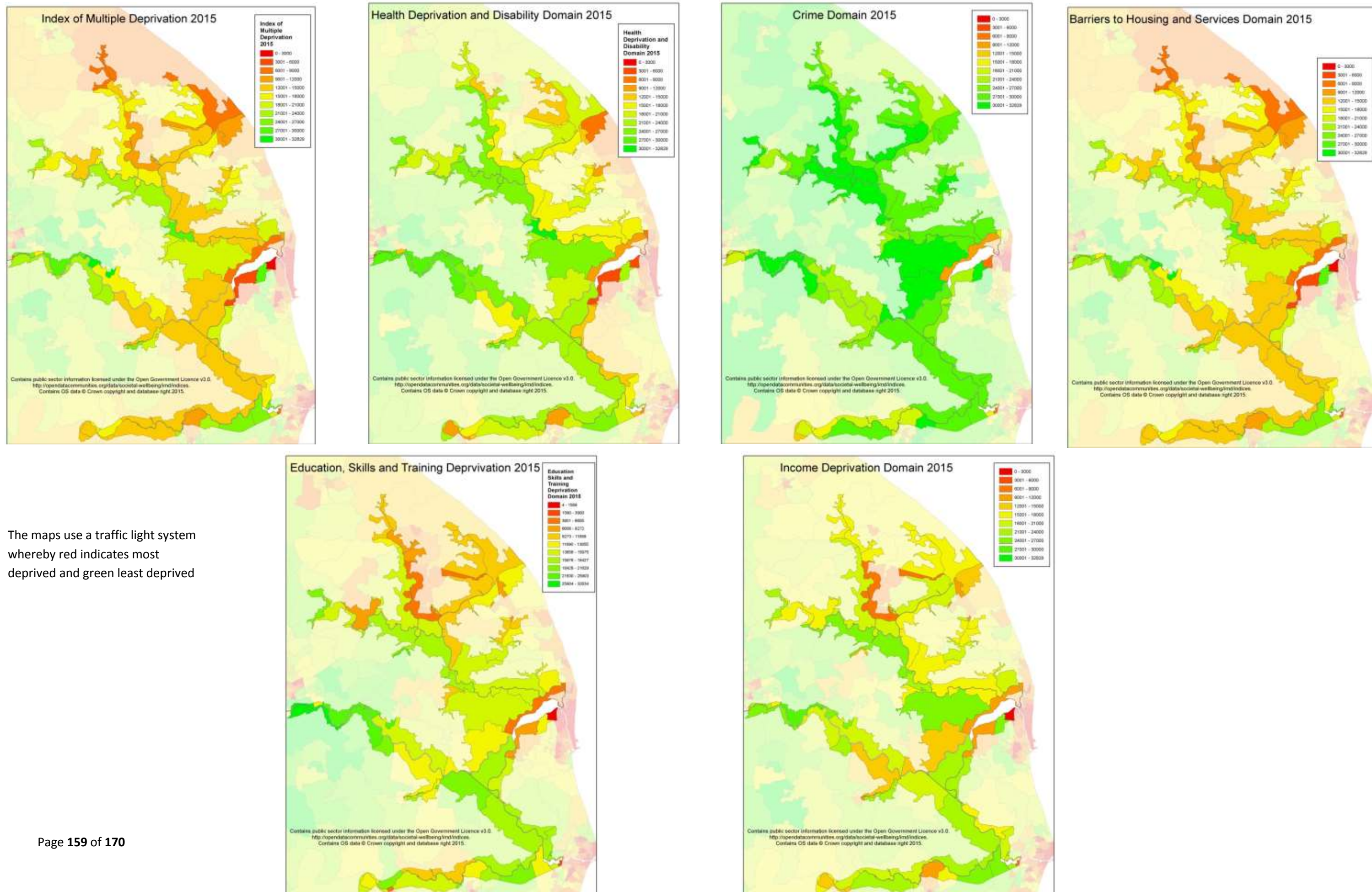
Please also provide any comments you have on the Interim Sustainability Appraisal which accompanies this Issues and Options Local Plan.

As a reminder, the consultation period ends at 4pm on 8 April.

After that time, we will collate and respond to each and every comment we receive and then turn our attention to producing the next version of the Local Plan – the Preferred Options. The Preferred Options will include draft policy text and it is intended to be out for consultation in Autumn 2016.

We look forward to hearing your views on the Broads Issues and Options version of the Local Plan.

Appendix A – Indices of Multiple Deprivation (2015)



The maps use a traffic light system whereby red indicates most deprived and green least deprived

Appendix B - Broads Local Plan Local Development Scheme

[illegible]

Appendix C - Broads Plan and Core Strategy Visions

The Broads Plan 2011 vision

By 2030, The Broads will be . . .

- An unrivalled wetland ecosystem of global natural and cultural importance, with a diverse and healthy environment comprising a mosaic of interconnecting habitats supporting a wealth of wildlife.
- An ever changing landscape managed through traditional and new approaches to respond effectively to change – in particular, to the opportunities and threats presented by climate change and sea level rise.
- A thriving, living working landscape recognised for its natural, historic and cultural beauty and as a wonderful place to live and work; where the importance of the waterways for navigation, biodiversity and recreation is recognised, protected and enhanced.
- A model of a low carbon society with inspirational examples of sustainable living and a local population engaged in the key debates and decisions about its future.
- A magical place of adventure, inspiration and reflection for everyone to discover and enjoy on land and water in ways compatible with its special qualities; a source of enjoyment, learning and personal development for every child in Norfolk and Suffolk during their school career.
- Recognised and valued as fundamental to our prosperity and sense of wellbeing and treasured as a place that provides a 'breathing space for the cure of souls'

The Core Strategy (2007) translates the Broads Plan Vision (2004) into the Spatial Vision for the Broads:

The Broads will continue to be a key national and international asset for the East of England and has a key role in the protected landscape of the region. There are close relationships with the adjoining Local Planning Authorities over the boundary of the Broads Executive Area. Therefore the landscape character and setting of the Broads have been protected. In line with this is the approach of an area of general restraint. Development will only have been permitted to meet social and economic needs for the purposes of the Broads Authority, set out in legislation.

The Broads will continue to contain areas of true tranquillity and wildness that many come to visit it for. However, this will not have been at the expense of those who come to use the Broads for more active recreational pursuits, such as boating, sailing and other water sports. Indeed the important navigation resource will have been protected and, where possible, enhanced.

The Broads will become a naturally functioning floodplain of extensive and connected habitats, accommodating the longer-term impacts of climate change, social and economic influences over the next 100 years.

The cultural heritage will be protected and enhanced, keeping alive lifelong skills in the process. Reed and sedge will continue to be harvested and grown commercially, and be re-established as a key employer in the Broads. By working with adjoining planning authorities, the problem of a lack of affordable housing for practitioners in local crafts will have been rectified in or adjoining the Broads area.

The Broads, an area for renowned sustainable tourism, will have a network of facilities around the waterways system complementing the range of moorings in urban and rural areas. Indeed, the tourist economy will be buoyant and thriving. The key gateway towns and city of Norwich, Great Yarmouth and Lowestoft will have been clearly established as such and their links to the Broads promoted, including emphasis of access by sustainable means. This enables visitors and residents to experience both the Broads and the attractions of established urban areas.

The Broads will be an area thriving with wildlife, and conservation sites will all be in good condition. The water quality will remain good, with any new development contributing to maintaining this. Water quantity will have been managed effectively in times of flood, and where possible protection measures will have added to the biodiversity and ecology of the Broads. Waste will have been managed effectively so there is no detriment to the environment.

Appendix D - Local Green Space – Nominations for Suitable Areas

Are there any green spaces in your parish that are important to your community?

If so, please fill out this form with details of your nomination of areas to be designated as Local Green Space.

Please email the completed form, maps and photos to: PlanningPolicy@broads-authority.gov.uk and title your email 'Local Green Space Nomination'.

Your name:

Your email address:

Your phone number:

Your address:

- What is the address of the proposed local green space?

- Have you included a map?

Yes

No

Your map should show the boundary of the green space (draw a line around it in a highlighter perhaps) as well as give the context to enable officers at the Broads Authority to find the site easily.

- Have you included photographs of the proposed local green space?

Yes

No

Please answer these questions:

1: Will the green space endure to 2036 and beyond? Why do you think this?

2: How far is the green space from the community it serves?

4: Is the green space local in character? Why do you think this?

3: Why/how is this green space special/how is it significant to the local community?

For example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.

Please note that:

- Your nomination will be assessed by a panel of Officers from the Broads Authority as well as relevant District Council. Some sites will be taken forward to the Preferred Options for consultation and some will not. We will make our reasons known and aim for the process to be as transparent as possible.
- We cannot guarantee that your nomination will be allocated as a Local Green Space as the nomination might not be suitable.
- Your nomination will be made public.

You can find more information on Local Green Space here:

- The Government's National Planning Policy Guidance:
<http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>
- Open Spaces Society Information Sheet:
<http://www.oss.org.uk/wp-content/uploads/2014/03/C20-Local-Green-Space-Designation.pdf>
- Get the green space you want: How the Government can help:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5907/2203637.pdf

Appendix E – Objectively Assessed Housing Need

Introduction

Opinion Research Services (ORS) was jointly commissioned by the Central Norfolk local authorities (Norwich City, Broadland, Breckland, North Norfolk and South Norfolk, together with the Broads Authority) to identify the functional Housing Market Areas (HMAs) covered by the five local authorities, in particular to establish the extent of the Central Norfolk HMA.

Methodology

The study adheres to the requirements of the National Planning Policy Framework published in 2012 and Planning Practice Guidance (March 2014). The methodology was also mindful of emerging good practice and outcomes from Examinations, as well as the Technical Advice Note about Objectively Assessed Need and Housing Targets that was published by the Planning Advisory Service (PAS) in June 2014. The methodology was based on secondary data, and sought to:

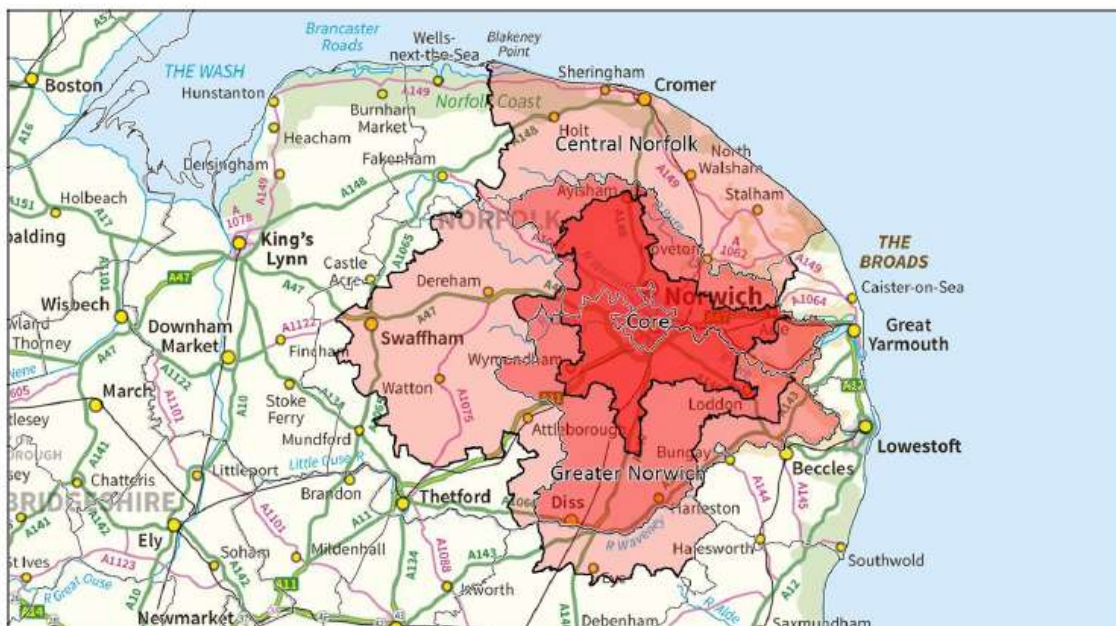
- Define the housing market area(s);
- Provide evidence of the need and demand for housing based on demographic projections;
- Consider market signals about the balance between demand for and supply of dwellings;
- Establish the Objectively Assessed Need for housing;
- Identify the appropriate balance between market and affordable housing; and
- Address the needs for all types of housing, including the private rented sector, people wishing to build their own home, family housing, housing for older people and households with specific needs.

Housing Market Area

The identification of the Housing Market Area (HMA) is therefore the first relevant building block in the evidence for identifying OAN for the study. A three stage HMA was identified for the Central Norfolk SHMA:

- Core – settlements with the strongest connections to the Norwich Urban Area. This has a strong similarity to the Norwich Policy Area (except the settlements of Acle, Aylsham and Loddon).
- Greater Norwich – A restriction on the Central Norfolk Housing Market Area confining the area to within the original commissioning Local Authorities' boundaries (Broadland, Norwich and South Norfolk) plus parts of Breckland.
- Central Norfolk – The full extent of the Central Norfolk Housing Market Area.

Figure 9: Housing Market Area in and around Greater Norwich (Source: UK Census of Population 2001 combined with DEFRA Classifications)



Source: Central Norfolk Strategic Housing Market Assessment (ORS 2015).

Affordable Housing

The study concludes that providing that 31.85% of housing was delivered to meet affordable housing need then this would cover both current and future projected needs for affordable housing, so there would be no need to increase overall housing provision

Total OAN for the entire Central Norfolk SHMA.

Figure 107: Projected dwellings over the 24-year period 2012-36 Including the City Deal (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

	Norwich Policy Area	Core HMA	Elsewhere in Greater Norwich	Elsewhere in Central Norfolk Functional HMA	Areas outside the Central Norfolk Functional HMA	OVERALL TOTAL	Greater Norwich Total	Central Norfolk Functional HMA Total
Total 2012-2036								
Norwich	19,928	19,928	-	-	-	19,928	19,928	19,928
Broadland	9,820	10,975	3,269	-	-	13,088	13,088	13,088
South Norfolk	10,998	10,528	8,156	-	-	19,153	19,153	19,153
Breckland	-	0	-	10,142	4,193	14,335	-	10,142
North Norfolk	-	0	-	8,171	1,850	10,021	-	8,171
Total	40,746	41,431	11,425	18,313	6,043	76,527	52,170	70,483
Annual Average by Authority								
Norwich	830	830	-	-	-	830	830	830
Broadland	409	457	136	-	-	545	545	545
South Norfolk	458	439	340	-	-	798	798	798
Breckland	-	0	-	423	175	597	-	423
North Norfolk	-	0	-	340	77	418	-	340
Total	1,698	1,727	476	763	252	3,189	2,174	2,937

The Broads OAN

The Broads are not included in any official population or household projections, but it was possible to estimate the indigenous change to the population and the net migration to the area to obtain population projections. Migration statistics have been calculated from the published data at a net 37 persons per year. The population projections can then be converted to household projections by using the weighted average headship rates for the Central Norfolk area.

If the Broads had a typical age profile and migration patterns as the rest of Central Norfolk its OAN would be around 1.0% of its existing dwelling stock per annum, which would represent a figure of around 30 dwellings per annum. However the projected dwelling requirement for the Broads is 253 for the period 2012-36 using long-term migration trends and 274 using jobs growth forecasts. The key driver behind these low figures is that the population profile of the Broads is older which gives more deaths and fewer household formations. Given the ageing population this will

generate a net population growth of around 25 persons per annum who need around 10-11 dwellings per annum. They are very low numbers, but reflect the age profile of the population.

Figure 94: Projected Dwellings needed for the Broads by Local Authority (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2011 Census. Note: figures may not sum due to rounding)

	Breckland	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	Waveney
ORS Model Using Long-term migration trends	0	53	95	3	34	63	47
Jobs led growth	0	57	103	3	37	69	51

Appendix F – Residential Moorings – call for suitable areas

Are there any areas which you think are suitable for residential moorings which meet the criteria as set out below?

If so, please fill out this form with details of areas you feel are suitable for residential moorings. A separate form for each site. Please email the completed form, maps and photos to: PlanningPolicy@broads-authority.gov.uk and title your email 'Residential Mooring Sites'.

Your name:	Your email address:	Your phone number:
Your address:		

- **What is the address of the proposed residential mooring?**

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- **We must have a map to show us the area you refer to.**

Your map should show the boundary of the residential mooring (draw a line around it in a highlighter perhaps) as well as give the context to enable officers at the Broads Authority to find the site easily).

Have you included a map? ☐

- **Have you included photographs of the proposed residential mooring?** **Yes** **No**

Please explain how your proposed site addresses the following criteria:

1: How many residential moorings or what length of residential moorings is proposed?	
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	

5: Is riverbank erosion an issue here? How would this be addressed?	
6: What are the adjacent buildings or land used for	
7: What is the character or appearance of the surrounding area?	
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	
9: What car parking is there for people living on boats (e.g. car park or park on road)?	
10: How can service and emergency vehicles access the area safely?	
11: How would waste and sewerage be disposed of?	
12: Is the area on mains sewerage?	
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	
14: Do you own the site? If not who does and have you told them about your proposal?	
15: What is the current use of the site?	

Please note that:

- Your nomination will be assessed by the Broads Authority.
- We cannot guarantee that your nomination will be allocated for residential moorings as the nomination might not be suitable.
- Your nomination will be made public

Appendix G – Areas of Tranquillity – call for suitable areas

Are there any areas which you think are particularly tranquil in the Broads?

When you go there, do you think you have ‘got away from it all’?

If so, please fill out this form with details of areas where the tranquillity could be protected through the Local Plan. Please fill out a separate form for each site.

Please email the completed form, maps and photos to: PlanningPolicy@broads-authority.gov.uk and title your email ‘Tranquil Areas’.

Your name:	Your email address:	Your phone number:
Your address:		

- **What is the address/location of the tranquil area?**

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- **Have you included a map?** **Yes** **No**

(Your map should give the context of the area to enable officers at the Broads Authority to find the site easily).

- **Have you included photographs or other supporting information?** **Yes** **No**

Please note that these nominations should cover larger areas, rather than a village green or garden.

Please explain how the proposed area addresses the following criteria:

Why is this area particularly tranquil?	
Why is this area ‘prized for its recreational value’?	
What recreation or leisure activities take place in the area?	

What noises can you hear?	
What would you say is the main source of noise in the area?	
What can you mainly see in and around this area?	

Please note that:

- Your nomination will be assessed by a panel of Officers from the Broads Authority.
- We cannot guarantee that your nomination will be allocated as a tranquil area as the nomination might not be suitable.
- Your nomination will be made public