



Local Plan for the Broads

Broads Authority response to Matter 5 – Other housing requirements June 2018

Issue – Have affordable housing needs, traveller needs, boat dweller needs and the housing needs of other groups been satisfactorily assessed and addressed in the Plan, in line with national policy and guidance?

[Chapter 25 – Housing: Policies PUBSP10 part b, PUBDM33, PUBDM35, PUBDM36, PUBDM37, PUBDM38, PUBDM39, PUBDM40, PUBDM41]

Questions

Affordable housing

- a) What is the total net need and expected rate of delivery of affordable housing in the Broads over the Plan period? Will there be a shortfall of supply against need?
- i. No net affordable housing need is identified for the Broads.*
 - ii. The historic approach and the approach of this Local Plan is to refer to or have regard to the affordable housing policies of the constituent districts' Local Plan. The Broads is part of the wider districts it sits in and the Authority will seek to contribute to the affordable need of the district if possible, bearing in mind the thresholds in national policy in relation to the typical size of development in the Broads (as discussed in the response to Matter 3 h) as well as the issue of viability. More detail is given in the following paragraphs.*
 - iii. Districts undertake the housing function for their entire district including the part in the Broads. Housing Teams collect and hold data for their entire District area rather than separating out the Broads area because the boundary of the Broads effectively follows the flood plain and cuts across parishes and settlements. There is not one parish which sits wholly within the Broads area. Homeless data, concealed households, overcrowded and sharing households and benefit claimant data is therefore not available at the Broads Authority Area level. Whilst there is some Census 2011 data relating to household composition, this only gives part of the picture.*
 - iv. The Strategic Housing Market Assessments that are relevant to the Broads are as follows. The Broads is not separated out in affordable housing terms in any of the SHMAs for the reasons set out in previous paragraphs.*

- a. *The affordable housing data in the Central Norfolk SHMA¹ is at district level only. Page 79 of the SHMA (EB5) shows that the overall housing need was adjusted to take into account concealed families and homeless households and the OAN was increased accordingly. Also see Figure 80 page 95 which presents the projected households and dwellings over the period 2015-36 for each of the 5 Local Authorities.*
 - b. *For Great Yarmouth Borough Council, the SHMA² was completed in 2013 covering the entire Borough including the part which is in the Broads. Affordability is discussed in chapters 4 and 5 with table 5.1 on page 53 showing unsuitably housed households in Great Yarmouth Borough.*
 - c. *The Waveney District Council SHMA part 2³, chapter 3, discusses affordability with chapter 5 discussing affordable housing need.*
- v. *Turning to delivery, as things stand now (in relation to the thresholds set out in the NPPG) and notwithstanding any viability arguments put forward by the developers, here are the likely sources and supply of affordable housing in the Broads:*
- *PUBOUL2 – has permission. Due to viability issues there was no affordable housing provided as part of the original scheme, however there is a clawback deal in progress. The Clawback Mechanism is included as a Schedule in the S106 Agreement document. It is worded and calculated so that Waveney District Council (as the housing authority) will receive 33% of the difference between the agreed 'base price' of the scheme and the final 'sale price' of the scheme. This mechanism allows a development to proceed where in the current economic situation it cannot sustain an affordable housing contribution, but it ensures that the District Council will get an affordable housing contribution if market/economic conditions improve before the development is built out/ completed. It is basically a safeguard mechanism to avoid development being thwarted by an inability to make S106 contributions but which will protect District Councils from losing out if the economic situation improves before the development is completed.*
 - *PUBTHU1 – has planning permission but is not providing affordable housing as Great Yarmouth Borough Council Housing Team did not wish for this to be provided in this location because it was not considered a suitable, sustainable location and would risk contributing to social and economic isolation.*
 - *PUBNOR2 – the original scheme (subsequently withdrawn) planned for 40 of the 120 dwellings to be affordable housing. It is therefore anticipated that affordable housing will come forward as a result of this site being developed.*

¹ The "Central Norfolk Strategic Housing Market Assessment 2017" covers Norwich City, Broadland, Breckland, North Norfolk and South Norfolk. EB5.

² <https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241&p=0>

³ <http://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Strategic-Housing-Market-Assessment-Part-2.pdf>

- vi. *It is accepted that PUBNOR2 is the only site where there is some degree of certainty around where and how affordable housing will be delivered in the Broads. This is because for the Pegasus scheme in Oulton Broad there is a claw back mechanism in place to reflect viability at the time of permitting the scheme and for Hedera House in Thurne, Great Yarmouth Borough Council did not support affordable housing in that location. For windfall schemes the average number of dwellings will generally be below the NPPG threshold for affordable housing contributions. The average size of dwellings in the Broads for the 10 years leading up to June 2016 is set out in the Housing Topic Paper EB13, Appendix A, where it demonstrates that the high proportion of schemes were below the NPPG threshold for affordable housing contributions.*
 - vii. *The evidence shows that the Authority plans for a significantly higher level of housing supply than its need through completions, allocations and permission as shown in the Housing Supply Topic Paper (EPS6, page 11, Section 8). Based on this oversupply of residential dwellings over the period to 2036, the Authority considers there is no justification for allocating more sites than those allocated in the Broads Local Plan for development or increasing the housing target.*
 - viii. *It is important to note that settlements are shared with the districts and the majority of the built up area is within the district planning area. Our districts' Local Plans may allocate land in their part of that settlement for large schemes that will be likely to meet the affordable housing thresholds and deliver affordable housing for the settlement as a whole, albeit not located in the Broads area. For example the emerging Waveney Local Plan allocates 1,500 dwellings at Beccles and Worlingham, 550 dwellings at Bungay and over 5,000 at Lowestoft so settlements that are partly in the Broads are seeing large scale growth that could deliver affordable housing to the benefit of the entire community. More detail is included at Appendix A, which provides the evidence that affordable housing in the vicinity of the Broads Executive area is likely to come forward as a result of the planned growth.*
- b) Does Policy PUBDM33 provide sufficient clarity regarding the affordable housing requirements, standards and thresholds that will apply?
- i. *The policy has regard to affordable housing policies of the districts' Local Plans. This approach is consistent with the Development Management DPD approach that has been in place since 2011 and has worked adequately. The requirements, standards and thresholds that apply to a scheme will reflect that of the district in which the scheme is located.*
 - ii. *Following the comments from the HBF (LP-PUB4 page 65, rep 215) it is proposed that the policy is amended to say: "Developments of 6 to 10 dwellings will be required to contribute a commuted sum towards the provision of affordable housing, in accordance with the affordable housing requirement of the full requirements of the adopted standards and policies of the relevant District Councils. The commuted sum will be calculated in relation to thresholds and level (%) of dwellings which should, subject to*

viability, be affordable. The commuted sum should reflect the subsidy required to deliver the affordable housing requirement off site (to include the cost of land and construction)". See Proposed Change 64 of LP-SUB2. This response and proposed amendment were shared with the HBF who think the amendment improves clarity.

- c) Is the requirement for schemes of 6-10 dwellings across the Broads area to provide commuted sums towards affordable housing justified?
- i. Yes. As outlined above, there is limited potential for the provision of affordable housing in the Broads. The reasons for this include the limited developable land, high land values, the effect of typical Broads' constraints on the viability of schemes and the typical size of sites. The national threshold for affordable provision is set at 10+ dwellings, however the majority of sites in the Broads fall below this threshold. The purpose of the proposed policy approach therefore is to reflect the specific circumstances of the Broads (whereby the majority of sites coming forward are small), and using the policy to capture some of the value of the developable sites and use this to enable the provision of affordable housing in the community, which would not otherwise come forward. Fundamentally, this will benefit the local community, even if it is not strictly located in the Broads Executive area. It is recognised that provision of affordable units on small sites can affect deliverability, marketability and price so the commuted sum approach was taken in order for the Broads Authority and District Housing Authority to be able to achieve a contribution without prejudicing sites coming forward and being built out.*

Travellers

- d) Is the assessment of the accommodation needs of gypsy and traveller and travelling show people in the Broads area, as set out in the Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) (2017), justified, robustly based and in line with national policy?
- i. Yes. The study was produced by experienced consultants who completed the study to the accepted methodology. No objections to the study have been received by the Authority. At the time of writing this response, the Greater Norwich Local Plan had consulted on their Regulation 18 version of their Local Plan and received no negative comments on the ANA 2017 study.*
- e) Is the Authority proposing to help meet the need for traveller accommodation identified within adjoining districts? Are proposed changes 68 and 69 (Schedule of Proposed Changes - March 2018) necessary for reasons of soundness?

- i. *Historically the Broads has not been an area used by these groups and there are no traditional sites used by travellers, gypsies and travelling show people. The districts have not, at this time, requested that we meet their need for traveller accommodation.*
 - ii. *Our Norfolk districts have not finalised their approach to Gypsy and Travellers and Travelling Show People as they are all at the early stages of their Local Plan production. Their need is set out in the ANA 2017.*
 - iii. *In Suffolk, Waveney District Council has completed the Regulation 19 consultation stage⁴ and according to their Gypsy and Traveller Assessment, there is a need for 17 additional pitches for gypsies and travellers in Waveney over the period 2016-2036. Waveney District Council proposes a criterion based policy (Policy WLP8.5). They do not allocate sites for Gypsy, Travellers and Travelling Showpeople. Waveney District Council has not requested specifically that the Authority assists in meeting this need.*
 - iv. *Conceivably over the plan period to 2036, schemes could come forward in the Broads which would count towards the needs of our districts. That is to say that the Authority could assist in meeting the need of our districts. A criteria based policy is therefore prudent.*
 - v. *The amendments are not required for soundness issues, but add clarification to the policy. As indicated in the Schedule of Proposed Changes (LP-SUB2 page 12, changes 68 & 69), the proposed changes would mean the policy would be used should a relevant need arise.*
- f) Does Policy PUBDM35 provide a fair and effective framework for determining traveller accommodation, which is line with national guidance?
- i. *Yes, the Authority considers it fair and effective.*
 - ii. *Great Yarmouth Borough Council commented on the Preferred Options version of the policy (LP-PO4 page 99) and the policy was assessed, but no major changes were made. They did not comment as part of the Regulation 19 consultation.*

Boat dwellers

- g) Is the assessment of boat dweller accommodation needs in the Broads area, as set out in the ANA (2017), justified and robustly based? Is there any overlap between the identified need for permanent residential moorings and OAHN?
- i. *Yes, the Authority considers it justified and robust. No negative comments have been made on the Assessment.*

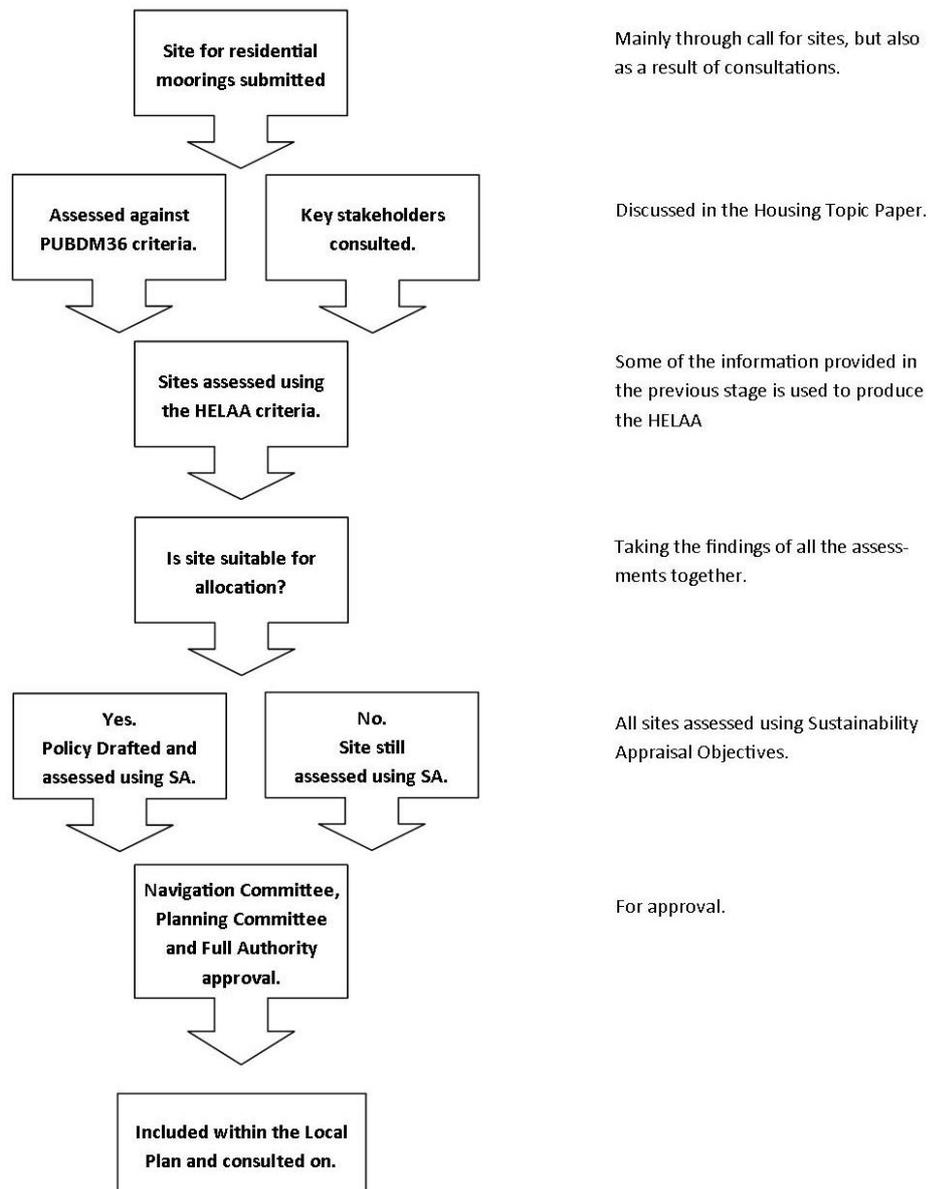
⁴ [http://consult.waveney.gov.uk/gf2.tj/f/911330/35229029.1/PDF/-/Waveney Local Plan Final Draft.pdf](http://consult.waveney.gov.uk/gf2.tj/f/911330/35229029.1/PDF/-/Waveney%20Local%20Plan%20Final%20Draft.pdf)

- ii. *It is important to note that the requirement to consider the need of those living on boats is a new requirement, set out in the Housing and Planning Act 2016. The Authority is unaware of any other such studies elsewhere in the country. The need has not been specifically investigated and identified by the Authority before and the consultants who undertook the study had not completed such an assessment before. The consultants used a similar approach as that used in calculating the need for Gypsies and Travellers. The study ensured that stakeholders were interviewed as well as some people who live on boats. It is important to note that the Residential Boat Owners' Association were consulted at each stage and have not raised concerns about the study.*
 - iii. *Regarding the potential overlap between the identified need for permanent residential moorings and OAHN, there are two ways of looking at this as discussed below.*
 - iv. *Whilst the CNSHMA (EB5) assessed demographic data and projections, it did not specifically assess the need relating to people who want to live on houseboats. Accordingly, it can be argued that residential moorings need should not be considered a way of addressing wider housing need as this specific need was not specifically considered in calculating the OAN.*
 - v. *Alternatively, it can be argued that residential moorings are a way of meeting housing need as the boats provide somewhere to live in a similar way as any other sort of accommodation – for example standard houses, flats, self-build, caravans etc. The different need for these different types of accommodation is not specifically separated out in the OAN and residential moorings are no different.*
 - vi. *In the interests of clarity, the Authority decided to separate out clearly the OAN and the residential mooring need. The residential mooring need of 63 is not included in the OAN, and the number of residential moorings delivered over the Plan period will not count towards the number of dwellings delivered. It may be useful to consider these as if they were two separate OANs; one for land-based dwellings calculated through the SHMA and the other for residential moorings calculated through the ANA. The total housing need in the Broads over the plan period is therefore 286 for land-based units and 63 for residential moorings.*
- h) How were potential residential mooring sites identified? Were proposed sites subject to a robust assessment of site suitability and sustainability appraisal? Does the evidence show clear reasons for accepting certain sites and rejecting others? How was capacity determined?
- i. *Two calls for sites for residential moorings were undertaken. One was a general call as part of the Issues and Options consultation (February to April 2016) and the second was undertaken in summer 2017 and was specifically targeted at boatyards and marinas which met the locational criteria for residential moorings in the adopted and emerging policy. The sites which came forward in response to these two calls were then assessed in EB24 Assessment of residential moorings nominations. Some further sites came forward as part of the Regulation 19 consultation – at*

St Olaves, Horning and Somerleyton (see page 4 and 5 of LP-PUB4, under "Additional sites").

ii. *The site assessment process had different stages and these are set out in the flowchart below. The assessments included:*

- *Criteria assessment as set out in PUBDM36*
- *Review of consultations with stakeholders*
- *HELAA*
- *Sustainability Appraisal*



iii. *Regarding the criteria assessment set out in PUBDM36 of the Local Plan (based on adopted policy DP25 of the Development Management DPD), the assessments are shown in the Residential Moorings Topic Paper (EB24). Stakeholder comments form part of this Topic Paper.*

- iv. *Sites were assessed using the HELAA methodology and then because, whilst the HELAA (EB12) was designed with housing on land in mind, the Authority felt it prudent to assess residential moorings in the same way as dwellings on land. EB37 provides summary commentary on the assessments of sites and if they were taken forward or not.*
 - v. *All nominations were also assessed through the Sustainability Appraisal (LP-PO2 and LP-PUB2).*
 - vi. *The Authority also assessed the three sites that came forward as part of the Regulation 19 consultation. These were assessed using the policy criteria, stakeholder comments, HELAA and SA and this is shown in LP-PUB9.*
 - vii. *Turning to the capacity that each site can take, the initial suggestion from the site owner was considered and assessed. On occasion the proposal as originally submitted had to be reduced in scale to better fit with the local area and local circumstances. For example Loddon Marina and Somerleyton Marina initially proposed their entire Marina for residential moorings but considering criterion a) in PUBDM36, such a scale was not deemed appropriate.*
- i) Why are a number of boatyards identified in the Plan as potentially suitable for residential moorings, but not allocated for specific mooring numbers or included in the supply figures? (including Policies BRU2, BRU4, HOR6, STA1, TSA2). How were such sites identified and assessed?
- i. *This approach was rolled forward from the Sites Specifics Local Plan 2014. It relates to the potential for windfall residential moorings and reflects that whilst there is not a development boundary covering these sites or next to these sites (as set out in PUBDM36 criterion a)) these sites are located in sustainable locations (see assessment of these settlements in EB28) and residential moorings could be suitable. The site owners were contacted as part of the summer 2017 call for sites to see if they wanted their sites allocated specifically for residential moorings, but nominations did not come forward.*
- j) What is the Authority's latest position on residential mooring supply over the Plan period? Is there evidence to demonstrate that any shortfall could be met through windfall development? Are additional residential mooring allocations, as set out in Proposed Changes 1 and 2 in the Schedule of Proposed Changes (March 2018), necessary for reasons of soundness, and would the proposed policies provide an effective framework to guide development?
- i. *The Housing Supply Topic Paper (EPS6) includes information on residential moorings. In section 2 there is information relating to delivery of the allocations and an updated trajectory is included at section 5 with the detailed phasing table.*

- ii. *Windfall for residential moorings amounts to ten delivered in 2017/18 and so based on historic trends with very small numbers, windfall for residential moorings is not deemed reliable, and therefore is not included in the residential mooring trajectory in EPS6.*
 - iii. *The need as set out in EB11 is 63 residential moorings between 2015 and 2036. The allocation of the sites at Horning and Somerleyton will take the total allocations and completions for residential moorings to 51. These sites (at Horning and Somerleyton) have been assessed (LP-PUB9) and are deemed suitable for allocation and would have been allocated earlier on in the plan period if they had have been put forward for consideration then. Over the plan period (to 2036), the Authority considers it likely that an additional 12 sites will come forward because the Authority intends to go out and visit specific boat yards to talk about the potential for residential moorings.*
- k) Does Policy PUBDM36 provide an effective framework for assessing proposals for permanent residential moorings? Does criterion a) provide sufficient flexibility/ scope to facilitate windfall development? How does the policy fit with the emerging River Wensum Strategy?
- i. *Yes, it does provide an effective framework. The policy has been rolled forward from the Development Management DPD 2011 (AP2, page 47, DP25) and amended to reflect use over the period since 2011. There are two main aspects of criterion a) which are the requirements to be located within or adjacent to development boundaries and to be located within boatyards, marinas and basins.*
 - ii. *Norwich City Council consider that criteria a) should change to allow residential moorings on main river channels rather than only in marinas, boatyards and basins (LP-PUB4 page 70 and 71).The Authority considers that the policy is suitable as written and does not agree with the proposed wording change to enable residential moorings on main navigation channels. The reasons are as follows.*
- A. **The City is generally different to the rest of the Broads.** *Only a very small part of the Broads is within the City. The city is very different in character to the rest of the Broads, even different to those parts of the Broads that are within towns and villages. This is because the river corridor has heavily engineered margins with steel piled edges which has allowed a large amount of residential property to be built immediately adjacent to it e.g. NR1 development, riverside between Carrow Bridge and Lady Julian Bridge, Quayside, New Mills Yard. This means that residential moorings in the City would be in a built up area amongst high density residential accommodation which is very different from the other urban areas in the Broads where there would be a magnified landscape impact caused by online residential mooring and its associated car parking (discussed in more detail later). Wroxham for example, has a large number of Boatyards and marinas, yet quickly reverts to a more natural and rural character moving away from Wroxham Bridge – riverside residential mooring could therefore be potentially detrimental to character*

in this location. Proximity to such a large number of residential properties in the City also gives rise to a greater likelihood of disturbance to local residents living in property on the banks in the City (again discussed later). River width in the City is also limited so there is a greater risk of unacceptable encroachment on the navigation. So whilst the proposed change in the policy could benefit Norwich, a change to a policy that applies to the entire area of the Broads could result in negative unforeseen consequences when considered in and applied to the wider context.

- B. Residential moorings are likely to be occupied on a more permanent basis than non-residential moorings and could be more prominent than other types of moorings.** *The siting of residential moorings requires greater consideration as they are likely to be of greater permanence, prominence and generally require additional servicing (see next point). By confining residential moorings to marinas, boat yards and mooring basins, development and activities can be concentrated and managed and the permanent visual impact is unlikely to be inappropriate given the character of boatyards. Moorings along rivers don't necessarily have boats moored at them all year round, whereas it is typical to have boats within a marina or boatyard constantly. The Authority considers that the permanence of residential moorings would fit in with the character of a boatyard more than some river banks.*
- C. Residential moorings have greater potential for paraphernalia associated with residential use and therefore can be more prominent in the land/townscape.** *This paraphernalia can develop at residential mooring sites on the tow path/banks which, with the boats being there for the majority of the time, means that there is a potential increased impact on the landscape; this is feedback the Authority gets from other navigation authorities.*
- D. Marinas and boatyards are likely to have infrastructure already in place.** *Locating residential moorings within marinas/boatyards means it is less likely that new infrastructure provision will be required or significant new features placed into the landscape because marinas/boatyards tend to have adequate facilities for sewage disposal, water supply, rubbish collection, electricity and car parking already in place.*
- E. Road access and car parking tend to be particular requirements of people who live on boats.** *Visitors on boats who moor overnight retain a water focus and tend to travel via the waterways; their focus is mainly on the river. Residential moorings tend to be permanently occupied by the boats that use them and the boats may not necessarily be able (or want) to navigate and tend in any case also to need access via the road network so the activity and requirements between the two types of mooring are different.*
- F. Marinas and boatyards are likely to have management staff/practices already in place.** *Marinas and boatyards tend to have established management procedures/agreements relating to those who*

moor their boat there. These procedures/agreements tend to ensure that boats are moored and used in an acceptable way. Whilst these agreements or practices tend to be aimed initially at private moorings, they can be adapted to residential moorings. Employees are also in place to manage the boatyard/marina and moorings. Moorings on channels would probably need to establish such agreements and management practices as well as employ staff to manage the moorings.

- G. Assessing individual sites is considered to be a better approach than a change to the policy, which could result in speculative applications.** It is difficult to make a general assessment of the potential impacts of residential moorings on main river channels and any such assessment would need to look at each potential location individually on its merits. Instances in the majority of the Broads area where residential moorings on the main river could be acceptable are likely to be few. The preferable approach would be for residential moorings outside of marinas etc. to come forward through nominations so they can be individually assessed on their merits and in a co-ordinated manner. Norwich City were offered the opportunity to put sites forward for consideration, but replied that they would not do this. It seems that the timing of the River Wensum Strategy means that sites have not been identified as yet. There could therefore be scope in future Local Plans to consider sites if they were put forward in a similar way to the allocations in the draft Local Plan.
- H. There is also the issue of potential impact of residential moorings near to existing dwellings.** Along main navigation channels in more urban areas, residential dwellings can overlook the river. If residential moorings were placed in front of these existing dwellings, there is potential for disturbance to residents living in properties near the river (from noise, rubbish) as well as amenity issues associated with overlooking from existing properties into residential boats. Urban sites would also need adequate car parking provision or there would be a risk of boat owners parking in inappropriate areas which could cause conflict.
- I. Other material considerations can also be taken into account at the application stage.** The current policy doesn't prevent applications for residential moorings on main river channels coming forward; applicants can submit planning applications for residential moorings where they consider that material considerations outweigh the policy. An example of this is in Great Yarmouth where there are early proposals for residential moorings as part of a wider regeneration scheme. The Authority recognises that there could be benefits from some residential moorings in Norwich and these would be taken into consideration at an application stage. The Authority does not however support a general policy change which could have unintended consequences to the rest of the Broads that are very different to the City.
- iii. Mr James Knight has objected to residential moorings needing to be located within or adjacent to development boundaries (LP-PUB4, page 69 and 70). The Authority's response is on page 70 of LP-PUB4 and can be summarised as follows:

- *All of the development boundaries allocated in the Local Plan encompass water or have parts which are adjacent to water.*
 - *Please note that the development boundary does not have to be about the Broads Authority Executive Area; it can be one of our constituent districts.*
 - *It is correct that the identified residential mooring sites are not within or adjacent to development boundaries but they have been found suitable for development following the assessment process undertaken. As such they have been allocated.*
 - *With 18 years left in the plan period and with further work going on outside the Local Plan which involves meeting suitably located marinas and boatyards to talk to them about regularising any residential moorings they have, or applying for permission for residential moorings, the Authority is being pro-active in seeking residential moorings around the system.*
 - *Regarding proximity to major employment areas, the sites at Loddon and Chedgrave are near to a good bus service to Norwich, the site at Brundall Gardens is near a train station to access Great Yarmouth or Norwich and Beccles residents can easily commute using public transport to Lowestoft. The Horning residents can use public transport to reach a higher order settlement of Hoveton. Somerleyton residents can get the train to Lowestoft or Norwich.*
 - *The sites allocated have access to services or facilities as assessed in the Topic Papers. They also have general support from the Highways Authority on sustainability grounds.*
- iv. *For the same reasons as set out in Matter 2, question d) i), the Authority recognise that places where people live could result in social isolation and wished to mitigate this risk. Directing residential to development boundaries means there is access to the services and facilities that people need or use very regularly. Indeed, document EB15 assess the 2015 Indices of Deprivation and the maps in section 7 (page 10 and 11) show the physical proximity of services and facilities and shows that the Broads is towards the deprived end of the assessment. The oranges, yellows and greens on the map tend to relate to the more urban areas implying greater access to services and facilities.*
- v. *As mentioned in the answer to i) in this matter, there are other locations which are not adjacent to or within a development boundary where residential moorings are deemed suitable in principle. This enables flexibility to the approach of criterion a), but keeps the focus of residential to areas with access to services and facilities that people who live on boats will need to and want to use. This reflects that unlike tourists, those who live on boats are more orientated to the land and need to use services and facilities more.*
- vi. *Fundamentally, residential moorings should be and are treated in the same way as any other form of housing.*

Other housing needs

- l) Does Policy PUBDM40 provide an effective framework for determining proposals for elderly and specialist needs housing, with sufficient clarity regarding spatial strategy/location requirements?
- i. *There is no spatial strategy in this Local Plan for this type of accommodation as this is being looked into at a County level. PUBDM40 is a criteria based policy that guides such developments to general areas that meet the criteria within it whilst respecting the nationally protected landscape and special qualities of the Broads. It reflects that staff and visitors to elderly and specialist needs housing will need to access the site and residents will want to access services and facilities such as GPs and pharmacies as well as shops. No comments were received on the policy.*
 - ii. *There is a clear requirement to establish the specialist housing needs for the Elderly. There are a number of initiatives being led by Norfolk County Council. This evidence will need to be drawn together with the revised NPPF to establish what further work may be required in this area. This will be addressed further in the emerging Norfolk Statement of Common Ground (effectively NSPF2):*
 - *Norfolk County Council will shortly award a contract for the development of a 'Supported Housing Delivery Programme' which will include a supported and agreed planning and housing need evidence base.*
 - *Norfolk County Council's Head of Quality Assurance and Market Development is also completing an evidence base which he is seeking to validate with district councils.*
 - *Norfolk County Council has also completed a report (Accommodation for older people-current supply current need and future need).*
 - iii. *Waveney District Council allocates a site for elderly accommodation in their emerging Local Plan.*
- m) Is the Authority's approach to custom/self-build housing, as set out in Policy PUBDM41 and the site allocation policies, justified and effective? What is the definition of 'multi-dwelling sites'?
- i. *Yes. The NPPF advocates a plan led-system and there is no statutory or policy provision which makes custom/self-build projects exempt from the need to meet the policies of the Local Plan. It is noted that Waveney District Council have a more detailed policy in their emerging Local Plan⁵ and some of the considerations in that policy could be included in the Authority's policy if the Inspector considers that appropriate.*
 - ii. *Of relevance, the policies for larger allocations include wording to encourage some of the plots on those sites being available for self-build. (see PUBNOR1, PUBOUL2).*

⁵ Page 198 and 199 of [http://consult.waveney.gov.uk/gf2.ti/f/911330/35229029.1/PDF/-/Waveney Local Plan Final Draft.pdf](http://consult.waveney.gov.uk/gf2.ti/f/911330/35229029.1/PDF/-/Waveney%20Local%20Plan%20Final%20Draft.pdf)

- iii. *As set out in regulations, the Authority has three legal requirements in relation to self-build and these are (1) to have a register of interest in self-build in place, (2) have regard to the register when undertaking planning, housing, disposal of land and regeneration functions and (3) the duty to permit enough serviced plots of land to meet the demand for self-build and custom housebuilding for each base period.*
- iv. *The Authority has a register in place and has regard to the register as required. The Authority has received confirmation from MHCLG that its exemption to the duty to permit enough self-build permissions for base-period 2 has been accepted. This exemption is in place until assessment of the register and land availability demonstrates the proportion falls below 20%. There is not an exemption to base period 1 and the Authority will continue to try and meet that demand.*
- v. *Multi-dwelling sites are sites with more than one dwelling on.*

Appendix A: Growth planned in shared settlements

The following table shows the planned growth in current or emerging Local Plans of our six districts. This shows that a settlement that is partly in the Broads is allocated growth in our districts' area and at a scale that mostly will meet the affordable housing threshold as set out in the NPPF (more than ten dwellings).

District	Shared Settlement	Allocated Growth in districts' Local Planning Authority Area.	Local Plan growth allocated in
Broadland District Council	Thorpe St Andrew	Sites for 231 dwellings and 71 dwellings.	Site Allocations DPD 2016
Broadland District Council	Brundall	150 dwellings.	Site Allocations DPD 2016
Broadland District Council	Salhouse	20 dwellings.	Site Allocations DPD 2016
Broadland District Council	Acle	Sites for up to 150 dwellings, 20 homes, 30 homes,	Site Allocations DPD 2016
Broadland District Council	Wroxham	120 dwellings	Site Allocations DPD 2016
Broadland District Council	Coltishall	Two sites of up to 30 dwellings each.	Site Allocations DPD 2016
Broadland District Council	Freethorpe	10 dwellings	Site Allocations DPD 2016
Broadland District Council	Reedham	Up to 20 dwellings	Site Allocations DPD 2016
Broadland District Council	South Walsham	Up to 20 dwellings	Site Allocations DPD 2016
Great Yarmouth Borough Council	Approximately 35% of new development	Main Towns at Great Yarmouth	CORE STRATEGY 2013 – 2030
Great Yarmouth Borough Council	Approximately 30% of new development	Key Service Centres at Bradwell and Caister-on-Sea	CORE STRATEGY 2013 – 2030
Great Yarmouth	Approximately	Primary Villages of	CORE STRATEGY

District	Shared Settlement	Allocated Growth in districts' Local Planning Authority Area.	Local Plan growth allocated in
Borough Council	30% of new development	Belton, Hemsby, Ormesby St Margaret, Martham and Winterton-on-Sea	2013 – 2030
Great Yarmouth Borough Council	Approximately 5% of new development	Secondary villages: Repps with Bastwick, Burgh Castle, Filby, Fleggburgh, Fritton, Ormesby St Michael, Rollesby and St Olaves. Tertiary village: Ashby with Oby, ,Mautby, Runham, Stokesby, Thurne, West Caister and Somerton.	CORE STRATEGY 2013 – 2030
North Norfolk District Council	Hoveton	120 dwellings	Site Allocations DPD Feb 2011.
North Norfolk District Council	Stalham	160 dwellings	Site Allocations DPD Feb 2011.
North Norfolk District Council	Horning	26 dwellings	Site Allocations DPD Feb 2011.
North Norfolk District Council	Catfield	15 Dwellings	Site Allocations DPD Feb 2011.
North Norfolk District Council	Ludham	Up to 15 dwellings	Site Allocations DPD Feb 2011.
Norwich City Council	Norwich	3,000 dwellings	Site Allocations DPD December 2014
South Norfolk	Bramerton	10 dwellings	Site Specific Allocations and

District	Shared Settlement	Allocated Growth in districts' Local Planning Authority Area.	Local Plan growth allocated in
District Council			Policies DPD 2015
South Norfolk District Council	Surlingham	Two sites of up to 5 dwellings each.	Site Specific Allocations and Policies DPD 2015
South Norfolk District Council	Broome	Two sites of up to 5 dwellings each.	Site Specific Allocations and Policies DPD 2015
South Norfolk District Council	Ditchingham	20 dwellings	Site Specific Allocations and Policies DPD 2015
South Norfolk District Council	Earsham	20 dwellings	Site Specific Allocations and Policies DPD 2015
South Norfolk District Council	Geldeston	10 dwellings	Site Specific Allocations and Policies DPD 2015
South Norfolk District Council	Gillingham	10 dwellings	Site Specific Allocations and Policies DPD 2015
South Norfolk District Council	Rockland St Mary	20 dwellings	Site Specific Allocations and Policies DPD 2015
South Norfolk District Council	Thurlton	20 dwellings	Site Specific Allocations and Policies DPD 2015
South Norfolk District Council	Loddon	200 dwellings	Site Specific Allocations and Policies DPD 2015
South Norfolk District Council	Trowse	160 dwellings	Site Specific Allocations and Policies DPD 2015
Waveney District	Beccles and	1,458 dwellings	Regulation 19 Local Plan April

District	Shared Settlement	Allocated Growth in districts' Local Planning Authority Area.	Local Plan growth allocated in
Council	Worlingham		2018.
Waveney District Council	Bungay	557 dwellings	Regulation 19 Local Plan April 2018.
Waveney District Council	Lowestoft	5,204 dwellings	Regulation 19 Local Plan April 2018.
Waveney District Council	Somerleyton	45 dwellings	Regulation 19 Local Plan April 2018.
Waveney District Council	Barnby and North Cove	50 dwellings	Regulation 19 Local Plan April 2018.