



Duty to Cooperate Statement.
Statement of Cooperation on Strategic Planning Matters
In support of the Submission Broads Local Plan¹
February 2018

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¹ Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), and Part 2 of the Town and Country Planning (Local Development) (England) Regulations 2012

1 Introduction

1.1 About this Duty to Cooperate Statement

The Localism Act 2011 imposes upon local planning authorities and others a ‘duty to cooperate’ on strategic planning matters (i.e. those that affect more than one planning authority area). The Duty requires that a Local Planning Authority engages constructively, actively and on an on-going basis with relevant or prescribed bodies in order to maximise the effectiveness of development plan preparation and strategic matters.

This statement summarises how the Broads Authority has met that requirement in terms of the activity of cooperation and the effectiveness of that cooperation insofar as it relates to the Proposed Broads Local Plan. This statement sets out how the Broads Authority has cooperated with the Prescribed Bodies as required by The Town and Country Planning (Local Planning) (England) Regulations 2012 (PART 2) Duty to co-operate as well as other National Parks and neighbouring District Councils. The prescribed bodies are:

- the Environment Agency;
- the Historic Buildings and Monuments Commission for England (known as Historic England);
- Natural England;
- the Mayor of London;
- the Civil Aviation Authority;
- the Homes and Communities Agency;
- each Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section;
- the Office of Rail Regulation;
- Transport for London;
- each Integrated Transport Authority;
- each highway authority within the meaning of section 1 of the Highways Act 1980(20)(including the Secretary of State, where the Secretary of State is the highways authority)

The Statement of Consultation that accompanies the Local Plan should also be referred to. This sets out the stages of consultation, which were consulted, what was said and the Broads Authority’s response to the representations and how the comments were taken on board.

Section 2 onwards discusses cooperation with the prescribed bodies.

1.2 Administrative Geography

The Broads is a national park equivalent protected landscape. The Broads Authority is a special statutory authority and the sole local planning authority for the Broads Authority Executive Area.

This designated area falls within the administrative area of six district level councils (Broadland, South Norfolk, North Norfolk, Waveney, Great Yarmouth Borough and Norwich City), and two county councils (Norfolk and Suffolk) (see [Appendix A](#)). The ‘district’ councils are local planning authorities only for that part of their respective administrative areas outside the Broads, but housing authorities, etc. for the whole of their district, including that within the Broads. Norfolk and Suffolk

County Councils are the county and minerals and waste planning authorities for the whole of their respective counties, including the Broads.

A coastal part of the Broads is also within the Norfolk Coast Area of Outstanding Natural Beauty. The AONB does not have a separate statutory authority, unlike national parks and the Broads, but is managed by the constituent local authorities and Natural England through the Norfolk Coast partnership.

There are 92² civil parishes (and two unparished areas) in the Broads designated area. In every case the parish includes land both within and without the Broads boundary (i.e. in two local planning authorities' areas).

1.3 History of Cooperation.

Importantly the 1988 Broads Act Section 17a makes it a general duty of all public bodies in exercising their functions to have regard to all 3 of the Broads Authority's purposes. This duty means the Broads Authority has long established relationships with government departments and agencies and a range of other local and public bodies in delivering national park purposes.

1.4 The future of Cooperation

At the time of writing of this Statement, the notion of cooperation through the production of Statements of Common Ground had been proposed in the Housing White Paper with the requirement potentially going to form part of the forthcoming consultation on changes to the NPPF.

For more information on this emerging proposal, please go here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590463/Fixing_our_broken_housing_market_-_accessible_version.pdf

As there had been no formal changes to the Duty to Cooperate as at March 2018 when the Local Plan was to be submitted, this Duty to Cooperate Statement sets out the cooperation mechanisms that support the Local Plan.

² Oulton Broad Parish Council was formed in 2017.

2 Neighbouring Local Planning Authorities

2.1 The Broads and its surroundings generally

Particular considerations apply in the Norwich area, because of the large scale of growth planned there. The particularities of these are dealt with in separate sections below.

At the eastern end of the Broads, the towns of Great Yarmouth and Lowestoft also have growth planned, but of a much smaller scale. Elsewhere around the fringes of the Broads area is generally largely rural, and there is more incremental change planned, including in the towns and other developed areas such as Beccles, Bungay, Hoveton and Stalham. The cross boundary issues generally tend to be very localised and specific.

The boundary of the Broads was determined in the light of its landscape, navigation and recreational value. The boundary largely follows the extent of the flood plain. Hence, typically the boundary will include the river frontage parts of settlements of which the greater part lies outside the boundary and within the district or borough council's planning area. In such cases, even if the settlement is identified by the council for some growth, this is usually best accommodated in that council's planning area, as the land within the Broads is usually constrained by the importance of conserving its nationally important landscape, navigation considerations, and at a high risk of flooding.

Because the boundary runs through the heart of settlements, it is the case that sites, ownerships and functions may straddle the boundary, and there is sometimes a need to coordinate on not just wider, 'strategic' matters, but also more site specific matters to ensure that development either side of the boundary is complementary.

2.2 Cooperation mechanisms

i) ***Direct links at member level:*** Each district and county council appoints one Councillor to Membership of the Broads Authority. Norfolk County Council has two appointed members whilst Suffolk County Council and the Districts have 1 each. A number of the Local Authority Appointed members sit on the Planning Committee. The Planning Committee's role relates to Development Management, Enforcement, Tree Protection Orders and Conservation Area, Neighbourhood Planning and Local Plan issues. Each consultation stage of the production of the Local Plan was agreed by Planning Committee as well as Full Authority. The Planning Committee remit also includes responses on consultations from the District councils, demonstrating co-operation works both ways. The current membership of Planning Committee is as follows:

- Mike Barnard, Waveney District Council
- Gail Harris, Norwich City Council
- Paul Rice, North Norfolk Council
- Haydn Thirtle, Great Yarmouth Borough Council
- Victor Thomson, South Norfolk District Council
- John Timewell, Norfolk County Council
- Melanie Vigo Di Gallidoro, Suffolk County Council
- Jacquie Burgess, Secretary of State Appointee
- Bill Dickson, Secretary of State Appointee

- Peter Dixon, Secretary of State Appointee
- ii) **Norfolk Strategic Planning Framework:** The purpose of the Norfolk Strategic Planning Framework (NSPF) is to produce a non-statutory framework with planning authorities across Norfolk about joint working to continue to ensure that the Duty to Cooperate is discharged and there is beneficial co-operation on strategic planning issues across a wide area. Four task and finish groups were formed to prepare the NSPF: Housing, Economy, Infrastructure and Delivery. These met regularly and were charged with producing the necessary evidence to inform their part of the Framework. This document will provide an overarching framework for strategic planning issues across the county, taking account of any key issues in neighbouring areas, and beyond with an emphasis on strategic land use issues with cross boundary implications. It relates to the period from 2012 to 2036 and is intended to support and inform the preparation of Local Plans produced by individual planning authorities. The NSPF was the subject of public consultation in 2017 and finally agreed by Local Planning Authorities in Norfolk in early 2018. Please see [Appendix B](#) that assesses the Local Plan against the NSPF agreements.
 - iii) **Joint Strategic Planning Member Group Meeting³ – Norfolk.** This meets quarterly and cross boundary issues are discussed with the way forward recommended for each constituent LPA to then take forward.
 - iv) **Informal discussions and meetings** are held between planning policy officers on sites and issues with cross boundary implications, on occasions involving directors of planning and individual Council or Authority members. For example a quarterly meeting is held between Waveney District Council and Great Yarmouth Borough Council and the Broads Authority. There is also a bi-annual meeting with Norfolk County Council.
 - v) **Ongoing engagement at officer level** (usually head of planning policy) takes place through the Norwich Strategic Planning Group (meeting monthly). There is a Suffolk equivalent which meets on an ad hoc basis.
 - vi) Joint working with relevant district councils takes place regarding the **Neighbourhood Plans⁴** that straddle both Local Planning Authority boundaries.
 - vii) **Specific discussions at officer level** occur on emerging cross boundary issues by telephone, email and meetings.
 - viii) **Other ongoing engagement at officer level including**
 - a. Norfolk Local Authorities Chief Executives (including police and fire service)
 - b. Norfolk Planning and Biodiversity Topic Group
 - c. Norfolk Conservation Officers Group
 - d. Suffolk Conservation Officers Forum

³ <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum>

⁴ <http://www.broads-authority.gov.uk/planning/planning-policies/neighbourhood-planning>

- e. Norfolk Heads of Planning
 - f. Norfolk public services summit (including the police and Public Health)
 - g. Norfolk Non-Native Species Initiative
 - h. Hosts and administer the Broads Biodiversity Partnership
 - i. Jointly Hosts and administer Broadland Catchment Partnership
 - j. Production of the River Wensum Strategy with Norwich City Council.
- ix) **Formal consultations** on development plan documents, supplementary planning documents, and planning applications with potential cross-boundary implications.
- x) BA is a member, and sits on the management group, of the **Norfolk Coast AONB Partnership**.
- xi) BA is a member of the **Norfolk Biodiversity Partnership** along with the relevant local authorities (Breckland, Broadland, Great Yarmouth, Kings Lynn and West Norfolk, North Norfolk, Norwich, South Norfolk), Natural England and the Environment Agencies, together with bodies not subject to the 'duty to cooperate', Anglian Water, British Trust for Ornithology, Royal Society for the Protection of Birds, Farming and Wildlife Advisory Group, Forestry Commission, Norfolk and Norwich Naturalists' Society, Norfolk Biodiversity Information Service, Norfolk Geodiversity Partnership, and Norfolk Wildlife Trust, University of East Anglia and Water Management Alliance.
- xii) BA is a member of the **Suffolk Biodiversity Partnership**, along with Suffolk County Council.
- xiii) **Arrangements with Norfolk and Suffolk County Council** for the provision of advice and services in relation to historic environment and archaeology, legal and property advice.
- xiv) The Authority's remit differs from a Local Authority, BA is a Local Planning Authority but does not have **statutory responsibilities** in, for example; housing, economic development⁵, environmental health, education, and highways, beyond its planning role. This means the Authority works closely with these local authority departments in both plan-making and decision-taking. This enables strong connection with other authorities at an officer level.
- xv) **Joint evidence base production.** Some evidence base to support Local Plan production has been commissioned jointly. See next section for detail. In general, where one of the Authority's constituent districts has commissioned evidence to support their Local Plan, it tends to cover the entire district, including that part of the district in the Broads Authority Executive Area.

2.3 Co-operation outcomes

A Memorandum of Understanding has been produced and signed to provide documentary evidence of the existing practice in relation to housing and employment planning in and around the Broads

⁵ That being said, in undertaking its functions, the Broads Authority must have regard to the needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads.

following revocation of the Regional Spatial Strategy. The Norfolk Strategic Framework also addresses this.

To address housing need in Great Yarmouth Borough and the Broads part of Great Yarmouth, a formal Duty to Cooperate Agreement has been produced to support the Local Plan. The Agreement can be found at [Appendix C](#) and to summarise states that Great Yarmouth Borough will meet the entire housing need for the Borough (including that part in the Broads area) and any dwellings delivered in the Broads part of the Borough will be counted by the Borough Council towards meeting that need.

A Statement of Common Ground was produced with Waveney District Council to agree the housing section of the Local Plan. See [Appendix D](#). This takes a similar approach to that agreed with Great Yarmouth Borough Council.

Agreement or coordination on approach and issues relating to a range of sites either side of the Broads boundary. These relate to both cross-boundary planning issues and sites within the Broads where the Authority's role of local planning authority needs to be coordinated with the relevant council's other responsibilities. Examples include –

- Open space – assessed by the districts and the new Local Plan seeks to allocate these areas of open space.
- Norfolk and Suffolk County Council regarding safeguarded minerals sites.
- Application stage for Ditchingham Maltings in South Norfolk and Pegasus in Waveney regarding open space and affordable housing.
- Application stage for the Utilities Site (also known as Generation Park). The entire scheme is within the areas of the Broads Authority and Norwich City. Joint working related to joint determination of applications as well as open space and affordable housing.
- Retail – working with Waveney and North Norfolk relating to a combined approach to joint areas of retail.

Joint Supplementary Planning Document with Waveney District Council on the Pegasus Site, Oulton Broad.

Cross-boundary Conservation Areas (and Conservation Area Appraisals) with each of Broadland, Great Yarmouth, Norwich, North Norfolk, South Norfolk and Waveney Councils.

Broads (and hinterland) Landscape Capacity Study Wind-Turbines, for Photo-Voltaics and Associated Infrastructure, with input/engagement of South Norfolk District and Great Yarmouth Borough.

With four Neighbourhood Plans adopted and more being produced, joint working is required to assist in their production as well as ensure the regulatory steps are met in good time.

Broads Biodiversity Action Plan(2009), Broads Biodiversity Audit (2011), Broads Biodiversity and Water Strategy (2013); Norfolk Biodiversity Action Plan; Suffolk Biodiversity Action Plan 2012.

Officer level support in planning appeals where there are cross-boundary impacts, e.g. wind turbines in Hemsby (GYBC) and Beccles (Waveney DC).

Completed joint evidence base, for example the Central Norfolk SHMA covers Breckland, Broadland, South and North Norfolk and Norwich and hence the part of the Broads Authority Executive Area in those districts. The Broads Authority, Waveney and Great Yarmouth Councils produced a Settlement Fringe study. There is the Most of Norfolk Gypsy and Traveller, caravan and houseboat study and most of Norfolk Strategic Flood Risk Assessment. An ecological networks study has been completed. Norfolk Recreation Impact Study was completed for all of Norfolk.

Norfolk and Suffolk County Councils were part of the new Flood Risk Supplementary Planning Document project group.

3 Greater Norwich (GN) Joint Core Strategy

Norwich City, Broadland District, and South Norfolk District, working with Norfolk County Council, have combined as part of the Greater Norwich Growth Partnership (GNGP). They produced a Joint Core Strategy for their combined planning areas (i.e. excluding the Broads) which was adopted in 2011 and then 2014. The GNGP are now reviewing their policies as they look to produce a new Local Plan.

The Broads Authority is an active member of the GNGP with officers and members involved.

Although the western part of the Broads is within the general area of the Joint Core Strategy, the Authority decided at an early stage to produce its own Local Plan for the Broads area separately. This is because of the very different issues and considerations generally applying in the Broads.

This growth is planned to take place entirely outside the Broads and within the GNGP Joint Core Strategy area, but there are a range of cross boundary and complementary issues.

3.1 Cooperation mechanisms

The Broads Authority is an active member of the GNGP with Officers attending the working group meetings, Director attending the Director Board and Member attending the joint Member Group meetings.

Statutory consultations on the GNGP Joint Local Plan.

3.2 Co-operation Outcomes

Considered Joint Core Strategy with other GNGP member authorities, but concluded that the nature of the planning issues was fundamentally different in the Broads, and that the Broads Authority could get a Local Plan in place for its area sooner outside the Greater Norwich Local Plan. The GNGP Local Plan thus covers the wider Norwich area (including beyond the boundaries of the City Council) but excludes the Broads area.

The Broads is recognised by the GNGP for its national importance, and for its contribution to the economy, environment and quality of life of the sub-region. The identification of the potential for large scale growth in the wider Norwich area has been informed by the sensitivities and value of the Broads.

Joint policy statement on the development of the cross-boundary East Norwich Site (Utilities and Deal Ground Sites) with Norwich City and South Norfolk District Councils.

Attended the Issues workshops which will inform early versions of the Local Plan.

Further cooperation could see involvement in the production of the evidence base to inform the Local Plan.

4 Coast

The coast in the vicinity of the Broads is low lying, and historically has been breached on a number of occasions and, separately, eroded significantly. The anticipated effects of climate change and other factors suggest a likely increase in frequency and severity of such events and processes.

The Broads' ecological, economic, community and landscape values and qualities are highly vulnerable to the effects of any future breach or over-topping of the coast, both in the vicinity of any breach and far inland. As well as the flooding likely to result, which could extend well inland, the incursion of salt seawater would very seriously affect internationally protected habitats and species, as well as the Broads ecology more generally.

The coast is also a key part of the Broads landscape, and well-loved for its accessible but remote feeling beach and dunes, and distinct habitats and species associated with the sea face of the coast, the brackish waters and soils on its landward side, and the intervening dunes. The combination of sensitive nature and visitor pressures (for instance, viewing of the seals and their pups on the beach in the winter is extremely popular) requires careful management.

4.1 Cooperation mechanisms

The Authority has been involved in the development of the adopted shoreline management plan (SMP) for the area, and the action planning to implement this and inform future plans.

The Authority sits on the 'SMP Client Steering Group' along with the relevant local authorities (who, unlike the Broads Authority, have formal powers and responsibilities for coastal defences and shoreline management planning) namely North Norfolk District, Great Yarmouth Borough and Waveney District Councils, together with the Environment Agency and the Norfolk Coast (AONB) Partnership.

The Authority has had long term involvement with Natural England and a range of other partners to develop, through discussion and research, understanding of the potential impacts of climate change, and possible adaption measures. (Note that these considerations are not confined to coastal matters, but are included here for convenience and because of their obvious particular relevance to the coast.) This cooperation currently takes the form of the Broads Climate Partnership, with a lead roles being played by BA, Natural England and the Environment Agency, together with the University of East Anglia, and involvement of local authorities, Norfolk Wildlife Trust, NFU, etc.

Recently, a group of coastal authorities (Norfolk and Suffolk Planning Policy Officers) has been set up and meet regularly to seek a consistent approach to addressing the coast in Local Plans.

4.2 Co-operation outcomes

Shoreline Management Plan 6 (Kelling Hard to Lowestoft Ness). Provides for intervention to hold the current line of the coast of the Broads for the medium term, while investigating the long term sustainability of this option.

A widening appreciation of the political, technical and community challenges in facing coastal change and other potential climate change impacts.

Increasing recognition by the coastal defence community that changes in this particular part of the coast could have a wide range of major impacts on the Broads stretching far inland, and of a need to further investigate and understand the risks and opportunities, including those further inland than the coastal strip itself.

Increased understanding of potential climate change effects on the area and the identification of a range of trial potential adaption measures.

5 National Parks family

Strategic planning matters – those that affect more than one planning area - are not limited to those areas which are contiguous. The Broads is part of the UK family of national parks, and for all their differences there are many issues which affect them jointly. They are largely rural areas with the highest status of protection and a national role in recreation and tourism, dependent on fragile ways of life and communities to maintain their distinctive landscapes, under great housing pressure for second homes and retirement, and highly vulnerable to erosion of their special qualities through incremental change. As such they need special treatment. National planning policies conceived primarily with urban and suburban areas of growth and regeneration in mind can be highly inappropriate. Special care and creativity is needed to ensure both that the national parks and the Broads are suitably conserved and developed, and to ensure that they make their full contribution to the quality of life and the economy of the areas around them and the nation more generally.

5.1 Cooperation mechanisms

The Broads Authority works closely, at both officer and member level, with the national park authorities, which are each the local planning authority for their national park area, to address emerging issues and share best practice. National Parks England (which includes the Broads Authority and all the English National Park Authorities), acts as the focus and conduit for much of this work, and especially the lobbying of Government to ensure that the interests of national parks and the Broads and their potential contribution to wider sustainability are better understood. Of particular relevance to the planning of the national parks and the Broads are the following standing officer working groups

- Chief Executives
- Heads of Planning Policy
- Heads of Planning
- Historic Environment Officers
- England Agriculture and Rural Development
- landscape
- Ecologists
- recreation and tourism

The National Parks, though National Parks England, also submit joint representations in response to Government consultations including on planning policy and have ongoing dialogue with DEFRA, DCLG, the Planning Inspectorate, etc. evidence to national commissions and enquiries (e.g. Rural Affordable Housing Commission).

5.2 Co-operation outcomes

Continuation of the special treatment of national parks and the Broads in the National Planning Policy Framework.

Enhanced policies and approaches to issues such as affordable housing, accommodation of housing growth, climate change mitigation and adaptation, wind farms and other renewable generation, contribution of development to landscape, wildlife, cultural heritage and recreation, etc. Since 2017, the BA Management Team has begun to meet regularly (on a six monthly basis) with the Management Teams/Senior Figures of the key stakeholder groups including, NE, Norfolk Wildlife

Trust, EA, Suffolk Wildlife Trust, New Anglia LEP and Broads Hire Boat Federation and Norfolk and Suffolk Boating Association

6 Environment Agency

Long standing close working arrangements (including joint projects) between the organisations on a range of issues, especially on planning policies for flood risk zones (a major issue in the Broads), flood defences, Shoreline Management Plan, water quality and resources, navigation matters, recreation, etc. Previous and current joint projects including EA/BA funding of a Catchment Officer. Statutory consultations, including on preparation of the Local Plan. The EA are also involved in the Norfolk Strategic Planning Officers Group and the production of the Norfolk Strategic Planning Framework and sit on the Member Forum. The EA were also part of the new Flood Risk Supplementary Planning Document working group.

7 Historic England

General consultation on planning documents. Liaison regarding the way forward with regards to the Broads and Archaeology. Historic England are also standing invitees and regularly attend the Norfolk Conservation Officers meetings and Suffolk Conservation Officers Forum meetings. Discussion over projects such as Water Mills and Marshes (now a Heritage Lottery Funded scheme which will deliver landscape scale benefits) and at times specific historic buildings and conservation areas.

8 Natural England

Long-standing close working arrangements (including joint projects) between the organisations on a range of issues around land and water management including Biodiversity Action Plans, climate change, etc.

Previous Joint projects including NE/BA funding of an officer to work on non-native species issues.

Statutory consultations, including on the Local Plan.

9 Mayor of London

Whilst not directly relevant to the Broads area, work has been ongoing in relation to cooperating over the wider South East of England. Members have attended some meetings. In general, Norfolk County Council Officers and South Norfolk District Council Leader (in his role as chair of the Norfolk Strategic Framework) have represented Norfolk in meetings.

10 Civil Aviation Authority

No relevant strategic issues have arisen during the review period.

(The Authority has, in the past, commented on consultation documents from Norwich International Airport, and drawn their attention to the issue of tranquillity in the Broads area as a matter for consideration in planning the airport's use of its controlled airspace.)

11 Office of Rail Regulation

No relevant strategic issues have arisen during the period.

(The Authority is a signatory to the East Anglia Rail Prospectus. It has also had extensive involvement with Network Rail in relation to issues around the maintenance, operation and any potential replacement of the aged swing and lifting rail bridges across the Broads' rivers (which affect navigation as well as rail services and passengers, and the accessibility of the area to visitors), at all levels from navigation rangers and rail bridge operators to BA Chief Executive and NR Directors).

12 Highways England

No relevant strategic issues have arisen during the review period. It is noted that there are intentions to improve the Acle Straight and roundabouts in Great Yarmouth and there is a policy that emphasises the issues to consider when producing the scheme. HE are supportive of this policy.

13 Homes and Communities Agency

No relevant strategic issues have arisen during the review period.

14 Clinical Commissioning Groups and National Health Service Commissioning Board

No relevant strategic issues have arisen during the review period. (The scale and pace of development in the Broads area is unlikely to affect healthcare planning.).

As set out in the Local Infrastructure Study, 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.

15 Transport for London

Not relevant to the Broads area.

16 Integrated Transport Authorities

None relevant to the Broads area.

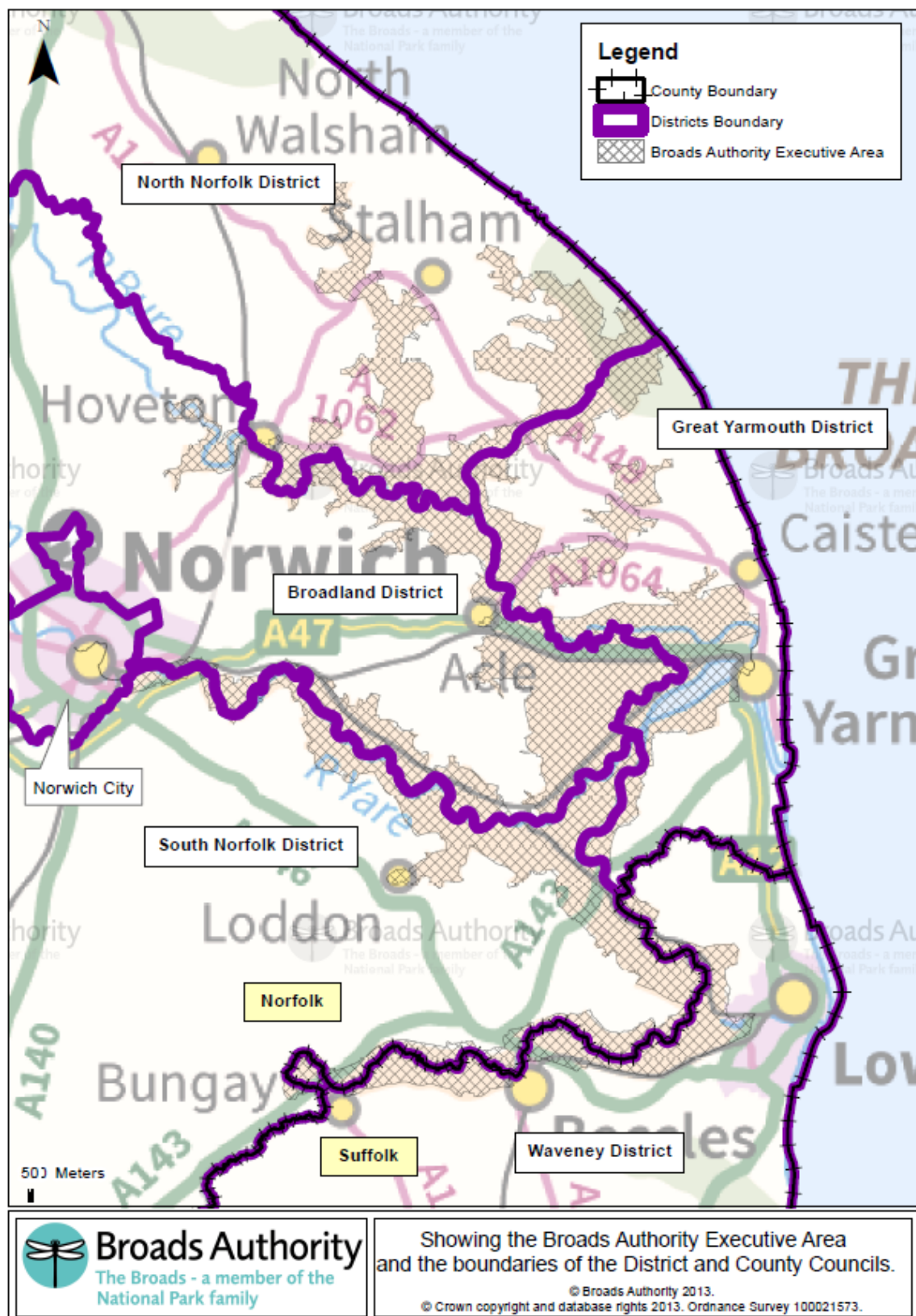
17 Marine Management Organisation

Formal consultations between the Authority and the MMO, including on the Broads Local Plan.

18 LEP and LNPs

The Broads Authority's Management Team meets with a member of the LEP Executive Team on a six monthly basis. The BA has had representatives on Wild Anglia's Board (Andrea Kelly, Senior Ecologist). At each stage of the process, New Anglia and Wild Anglia have been consulted.

Appendix A: The Broads Executive Area, District Boundaries and County Boundaries.



Appendix B: Assessment of the Local Plan against the Final Norfolk Strategic Planning Framework Objective, January 2018.

Introduction

In early 2015 the Norfolk Local Planning Authorities, working through its strategic planning member forum, agreed to formally cooperate on a range of strategic cross-boundary planning issues through the preparation of the Norfolk Strategic Planning Framework. The aim of producing the framework is to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of future Local Plans;
- Demonstrate compliance with the duty to co-operate;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high level plans (such as the Strategic Economic Plan); and
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

This assessment shows how the Local Plan meets each of the draft agreements.

Assessment of the Agreements

Agreement 1 - That when preparing new Local Plans which seek to identify levels of Objectively Assessed Need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.

The Broads Local Plan period is to 2036.

Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision:

“By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural, built and historic environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life for residents. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel.”

The wording is generally reflected in the Local Plan’s vision:

By 2036 the Broads will be a place where...

The natural environment and the beneficial goods, services and cultural values it provides, from food and energy to landscape character and recreation, are in good condition, are used fairly and

sustainably, and are valued by society. In particular, the precious nature of clean, fresh water as a fundamental resource is understood and respected by all.

The past and present importance of the waterways for navigation, biodiversity and recreation is recognised and cherished, and the asset is protected, maintained and enhanced. Wildlife flourishes and habitats are maintained, restored, expanded and linked effectively to other ecological networks. Land and water are managed in an integrated way, with local and landscape scale management creating resilience and enabling flexible approaches to meet changing ecological, economic and social needs.

The living, working, 'big skies' landscape is notable for its natural beauty, distinctive local character and historic significance. People of all ages, abilities and circumstances experience and enjoy it as a place of escape, adventure, enjoyment, learning and tranquillity, and as a source of national pride and identity. Sustainable living can be seen in action and there is a buoyant rural economy. Local communities are taking an active part in decisions about their future and are known for having been pivotal in the transformation to a low carbon, 'climate-smart' society.

And finally, the Broads National Park is forever recognised as fundamental to our prosperity, health and wellbeing, and forever treasured as a special place that provides a "breathing space for the cure of souls".

Agreement 3 - By 2036, through co-operation between Local Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership Economic Strategy, the Greater Cambridge Greater Peterborough Enterprise Partnership Economic Strategy and this framework;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements and across county boundaries to strengthen inward investment; and
- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure.
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.

- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

To reduce Norfolk's greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- effecting a major shift in travel away from car use towards public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes in line with the Economic Strategies of New Anglia & GCGP LEPs;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

To improve the quality of life for all the population of Norfolk by:

- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at local level.

To improve and conserve Norfolk's rich and biodiverse environment by:

- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;

- protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- minimising, where possible, development on the best and most versatile agricultural land;
- where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- protecting, maintaining and enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources; and
- Protecting and enhancing water, air, soil and other natural resource quality where possible.

The Objectives of the Local Plan are copied below and in general are in conformity with these objectives. The policies in the Local Plan in general also meet these objectives.

- **OBJ1. The Broads remains a key national and international asset and a special place to live, work and visit.**
- **OBJ2. There are areas of true tranquillity and wildness, giving a real sense of remoteness.**
- **OBJ3. The Broads is a unique, highly valued and attractive environment where the landscape character and setting is protected, maintained and enhanced.**
- **OBJ4. The rich and varied habitats and wildlife are conserved, maintained, enhanced and sustainably managed.**
- **OBJ5. The coastal section of the Broads is used and managed in a balanced way beneficial and integrated way for people and wildlife.**
- **OBJ6. Water quality is improved and water is managed using appropriate measures to increase capture and efficiency, prevent pollution and reduce nutrients. Flood risk to people, property and landscapes is managed effectively.**
- **OBJ7. 'Climate-smart thinking' minimises future adverse impacts and makes use of opportunities in an area vulnerable to a changing climate and sea level rise.**
- **OBJ8. The area's historic environment and cultural heritage are protected, maintained and enhanced. Local cultural traditions and skills are kept alive.**
- **OBJ9. The housing needs of the community are met.**
- **OBJ10. Development and change are managed to protect and enhance the special qualities of the Broads as well as the needs of those who live in, work in and visit the area. The Broads Authority maintains close cooperation with the Local Planning Authorities adjoining its executive area.**
- **OBJ11. The Broads offers communities and visitors opportunities for a healthy and active lifestyle and a 'breathing space for the cure of souls'.**
- **OBJ12. There is a buoyant and successful rural economy.**
- **OBJ13. The Broads is renowned for sustainable tourism and supports a prosperous tourism industry.**
- **OBJ14. People enjoy the special qualities of the Broads on land and on water. Access and recreation is managed in ways that maximise opportunities for enjoyment without degrading**

the natural, heritage or cultural resource. Navigation is protected, maintained and appropriately enhanced, and people enjoy the waterways safely.

- **OBJ15.** The Broads continues to be important for the function, identity and recreation of the local community as well as over a wider area.
- **OBJ16.** Waste is managed effectively so there is no detriment to the environment.

Agreement 4 –To produce and maintain Strategic Housing Market Assessments covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

The Broads is in Great Yarmouth and Central Norfolk HMAs as well as Waveney HMA.

Agreement 5 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

Noted.

Agreement 6 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.

Noted.

Agreement 7 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

The Broads had produced a Local Plan.

Agreement 8 - The above list of locations are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses.

Table 9: Objectively Assessed Need (OAN) in Norfolk Housing Market Areas.
Source: CN SHMA 2017, KLWN OAN Update 2016, GY SHMA 2013, AMR 2016

Housing Market Area	Planning Authority Area	Total OAN identified in Assessment for the 21 years between 2015-2036	Annualised OAN
Central Norfolk SHMA**	Norwich City	15,201	724
	South Norfolk	16,032	763
	Broadland	8,160	389
	Breckland***	12,272	584
	North Norfolk	8,511	405
Central Norfolk Sub Total (excluding BA area)		60,176	2,865
King's Lynn and West Norfolk OAN Update 2016*	King's Lynn and West Norfolk	14,070	670
Great Yarmouth SHMA 2013*	Great Yarmouth Borough Council	8,820	420
Part Central Norfolk part Great Yarmouth HMA	Broads Authority (within Norfolk)	229	11
Norfolk Total		83,295	3,966

* Totals for Great Yarmouth and King's Lynn and West Norfolk assume annualised rates identified in published SHMAs are rolled forward to 2036. All SHMAs will be subject to periodic update and these updates and other evidence will be used to establish Local Plan housing targets.

** Based on CN SHMA June 2017 which reflects the 2014 household projections, excluding any additional provision needed to reflect the City Deal

*** Note as the Breckland Local Plan is covering a period of 2011-36 it's annualised OAN is considered to be 612pa rather than 584pa as this reflects under delivery in the period 2011-15

The Local Plan meets the need (and exceeds the need) for Central Norfolk and Waveney Housing Market Areas. An agreement is in place with Great Yarmouth Borough Council regarding the residual need in that part of the Broads and this is explained in the Housing Topic Paper.

Agreement 11 – The Broads Authority will meet its calculated portion of the wider housing need within each of the relevant SHMAs, as far as is compatible with the protection of the Broads landscape and special qualities.

The Local Plan meets the need (and exceeds the need) for Central Norfolk and Waveney Housing Market Areas. An agreement is in place with Great Yarmouth Borough Council regarding the residual need in that part of the Broads and this is explained in the Housing Topic Paper.

Agreement 12 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Noted and welcomed. See Housing Topic Paper.

Agreement 13 – In addition to their OAN, Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of 5,228 homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

Noted. That need is being addressed as part of the Greater Norwich Local Plan.

Agreement 14- The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

The Norfolk-wide study that looked into Elderly need housing did not break down a need to the Broads Executive Area, as such there is a criteria based policy in the Local Plan. The Gypsy and Traveller and Travelling Show People work indicates no need for sites or pitches in the Executive Area, however the Local Plan does include a criteria based policy to assess such applications. The merging Houseboat work indicates a need for houseboats/residential moorings in the Local Plan. This is addressed through a combination of allocations and criteria based policy.

Agreement 15 – All Local Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

The Broads' HELAA has been produced in line with the agreed methodology.

Agreement 16 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:

- Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.
- Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.

Hedera House in Thurne has planning permission. Land in Stokesby is for four dwellings and the landowner is keen to develop the site. The Utilities Site had a planning application that was withdrawn and there are discussions ongoing with the promoter about the wider scheme that forms part of. Turning to residential moorings, the promoters are all keen to deliver residential moorings. With regards to housing mix, see policy in Local Plan that refers to mix of houses.

Agreement 17 – Norfolk is identified as an area of serious water stress, the Norfolk Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

There is a policy in the Local Plan that addresses this.

Agreement 18 –The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure.

Noted and we will provide information as required.

Agreement 19 - To maximise the speed of rollout of 5G telecommunications to Norfolk, the Local Planning Authorities will seek to engage with the telecommunications industry to produce shared guidance on the location of base and booster stations for the 5G network, taking into account material planning considerations. The aim is to get this guidance agreed before the end of 2018 with it potentially being included in emerging Local Plan documents.

The Local Plan has a policy relating to utilities infrastructure. It emphasises the importance of considering impacts on the Broads landscape and other special qualities.

Agreement 20 - The authorities agree to endorse Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Assuming this is formally agreed it is expected that each Norfolk CCG will formally agree the Protocol via its Governing Body, and NHS England will do via senior officer support.

Formerly agreed at Broads Planning Committee. A policy in the Local Plan generally reflects the approach of the protocol. DM Officers also aware of the requirements of the Protocol.

Agreement 21 - The Local Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

We have worked with Norfolk County Council regarding education provision in the Broads Executive Area and as stated in the Local Infrastructure Study there is not a need to address specific education needs in this Local Plan. The Authority's Planning Obligations generally supports this agreement.

Agreement 22: In recognition of:

- a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;
 - b) the pressure that development in Norfolk could place on these assets; and
 - c) the importance of ecological connections between habitats
- the Local Planning Authorities will work together to produce a GI Strategy for Norfolk in early 2018 which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

The Authority will contribute to this work and there are numerous policies in the emerging Local Plan to hook this work to.

Agreement 23 - In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the signatories to this document agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

The Authority supports this work and funding is allocated in the budget to contribute.

Appendix C: Duty to Cooperate Agreement between Great Yarmouth Borough Council and Broads Authority



GREAT YARMOUTH
BOROUGH COUNCIL



Duty to Cooperate Agreement
Between the Broads Authority and Great Yarmouth Borough Council
In relation to housing need and delivery
October 2017

AGREEMENT

This agreement is made in accordance with long established practice, formalised in a series of Memoranda of Understanding¹, and in meeting the 'duty to cooperate'² on strategic planning matters.

Great Yarmouth Borough Council and the Broads Authority recognise the value of constraints to housing development in the Broads, having regard to legal duties³ and national policy⁴ etc., but also the importance of meeting housing needs⁵.

Great Yarmouth Borough Council commits to meeting the whole of the Borough's housing requirement

The Broads Authority agrees to report housing completions within the Great Yarmouth Borough part of the Broads to Great Yarmouth Borough Council, and that these are counted towards Great Yarmouth Borough Council's housing delivery targets.

Signature:

Print name: Councillor Graham Plant

Sir Peter Dixon

Position: Leader and Chair of Policy and
Resources Committee

Chair of Planning Committee

Authority: Great Yarmouth Borough Council

Broads Authority

BACKGROUND

The Broads Authority (BA) is the local planning authority for the whole of the designated Broads Area, part of which lies within Great Yarmouth Borough.

Great Yarmouth Borough Council (GYBC) is the local planning authority for the Borough excepting that part within the designated Broads area, and the local housing authority for the whole of the Borough.

GYBC defined the whole of the Borough as a housing market area, and this has been agreed by all the neighbouring authorities⁶.

GYBC published a Strategic Housing Market Assessment (SHMA) for the whole of the Borough in 2013, and adopted a Core Strategy providing for the whole of the Borough's needs (7,140 dwellings 2013 to 2030), including that for that part of the Borough in the Broads.) That SHMA does not seek to separately identify the housing need for that part of the Borough within the Broads.

Working with partners⁷ BA produced a Strategic Housing Market Assessment for the Central Norfolk area, which calculated an Objectively Assessed Housing Need for the Broads. This included that part of the Broads within Great Yarmouth (notwithstanding that this is in a different Housing Market Area), and for this specific area calculated a need for total of 66 dwellings between 2015 and 2036.

The Publication Local Plan for the Broads allocates land for around 20 dwellings in the Great Yarmouth Borough part of the Broads. During the period April 2015 and April 2017 there was one dwelling completed, and 6 dwellings permitted but not completed. BA therefore calculates it has a residual need for an additional 39 dwellings for that area.

¹ E.g. Memorandum of Understanding on 'Treatment of Housing and Employment Needs and Delivery in the Broads' between GYBC and BA dated February 2014.

² Under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended).

³ Including those under the Norfolk and Suffolk Broads Act 1989 (as amended).

⁴ Including paragraph 115 of the National Planning Policy Framework (NPPF).

⁵ Including paragraphs 47 and 54 of the NPPF.

⁶ Most recently, for Norfolk authorities, in the draft Norfolk Strategic Framework they published in August 2017.

⁷ Breckland District Council, North Norfolk District Council, Broadland District Council, South Norfolk District Council and Norwich City Council.

Appendix D: Statement of Common Ground between Waveney District Council and Broads Authority.



**Duty to Cooperate
Statement of Common Ground
Between the Broads Authority and Waveney District Council
In relation to housing need and delivery
January 2018**

STATEMENT

The Broads Authority (The Authority) and Waveney District Council (The Council) considers that the Waveney element of the Broad's Objectively Assessed Need amounts to 57 dwellings between 2015 and 2036 and this forms part of Waveney's Housing Market Area objectively assessed need.

The Authority and The Council considers that housing completions in the Broads Authority area count towards Waveney District Council's objectively assessed need as agreed in the Memorandum of Understanding from 2012.

The Authority agrees to report housing completions within the Waveney part of the Broads to Waveney District Council, and that these are counted towards Waveney District Council's housing delivery targets.

Signature:

Print name: Cllr David Ritchie

Position: Cabinet Member for Planning

Authority: Waveney District Council

Sir Peter Dixon *Paul Rice*
VICE CHAIR

Chair of Planning Committee

Broads Authority

BACKGROUND

The Broads Authority (BA) is the local planning authority for the whole of the designated Broads Area, part of which lies within Waveney District.

Waveney District Council (WDC) is the local planning authority for the Borough excepting that part within the designated Broads area, and the local housing authority for the whole of the Borough.

WDC published a Strategic Housing Market Assessment (SHMA) for the whole of the District in 2017, and is producing a Local Plan that seeks to provide for at least 8228 dwellings between 2014 and 2036. That SHMA does not seek to separately identify the housing need for that part of the District within the Broads.

Working with partners¹ BA produced a Strategic Housing Market Assessment for the Central Norfolk area, which calculated an Objectively Assessed Housing Need for the Broads. This included that part of the Broads within Waveney (notwithstanding that this is in a different Housing Market Area), and for this specific area calculated a need for total of 57 dwellings between 2015 and 2036.

The Publication Local Plan for the Broads allocates land for around 76 dwellings at Pegasus boatyard in Oulton Broad. This has permission but is not built out at the time of writing. During the period April 2015 and April 2017 there was one dwelling completed, and 8 dwellings permitted but not completed (including the 76 dwellings at Pegasus). BA therefore calculates it has over provided by around 56% through completions, permissions and allocations.

¹ Breckland District Council, North Norfolk District Council, Broadland District Council, South Norfolk District Council and Norwich City Council.