



## Local Plan for the Broads

### Broads Authority response to Matter 11 – Transport, the economy and tourism

May 2018

***Issue – Does the Plan set out positively prepared policies for sustainable travel and safe access, and supporting a thriving economy and tourism sector which are justified, effective and consistent with national policy?***

**[Chapter 21 – Transport: Policies PUBSP8, PUBSP9, PUBDM22, PUBDM23]**

**[Chapter 32 – Site specific policies: Policy PUBSSROADS]**

**[Chapter 22 – The Broads economy: (Policy PUBSP10 is covered in Matter 2)  
Policies PUBSP11, PUBDM24, PUBDM25, PUBDM26, PUBDM25, PUBDM27]**

**[Chapter 23 – Sustainable tourism: Policies PUBSP12, PUBDM28, PUBDM29]**

#### Questions

- a) Does Policy PUBDM22 provide sufficient clarity on adopted parking standards?
  - i. *Paragraph 2 of the reasoned justification to PUBD22 on page 76 says that the District Council and County Council will be contacted regarding parking standards in respect of any relevant proposal. If the Inspector is minded to improve this referencing, a list of the standards and where to find them could be incorporated as an appendix to the Local Plan, albeit with a caveat to advise that the list was correct at the time of writing but that standards are likely to change over the plan period.*
  
- b) What are the thresholds for seeking Transport Assessments and Transport Statements, as referred to in Policy PUBSSROADS?
  - i. *Although it is no longer current the thresholds set out in DfT publication 'Guidance on Transport Assessments' (2007) is used by both Norfolk and Suffolk County Councils. The guidance is set out in Appendix A to this statement.*

- ii. *For example, Suffolk County Council uses the following thresholds for residential use. They are not wholly prescriptive as local factors can influence the need for either document and the planning officer would advise on a case-by-case basis:*
- *Residential:*
    - a. *Less than 50 dwellings = N/A*
    - b. *50 – 80 dwellings = TS*
    - c. *80+ dwellings = TA*
  - *Other land uses: Varies dependent on floor space, vehicle movements or car parking provision.*
- iii. *Norfolk County Council say that following the Government’s decision to archive the “Guidance for Transport Assessments” (GTA), Local Authorities are now required to establish their own criteria for when a Transport Assessment (TA)/Transport Statement (TS)/Travel Plan (TP) is required with more emphasis being placed on detailed assessment prior to the implementation of the Local Plan. Given that the NPPF requires an assessment of the transport impacts of a development, Norfolk County Council in its role as Local Highways Authority has broadly continued with the GTA thresholds/scales for when a TA/TS/TP is required as the GTA is well understood and accepted guidance within the development industry. The only change relates to the threshold of when a TA or TS is required for residential developments and this has been increased from 80 to 100 dwellings. A TP must be prepared alongside the TA. The Thresholds are as at Appendix A acknowledging the change from 80 to 100 discussed previously.*
- c) Does Policy PUBDM27, in conjunction with PUBSP11, strike an appropriate balance between protecting waterside sites in commercial use and allowing businesses to diversify/relocate? Is a ‘waterside site in commercial use’ clearly defined? What scale, type and form of employment re-use/diversification would be permitted?
- i. *Both PUBDM27 and PUBSP11 allow for the development of additional buildings to support the existing use(s), and for additional buildings to support diversification, subject to criteria to protect the primary waterside use. Both policies take into consideration the fact that waterside employment cannot be easily relocated due to the limited availability of suitable waterside sites.*
- ii. *The criteria in all policies are consistent in that justification for any diversification is required, they all require the retention of part of the original employment use and that the diversification should not compromise the existing business. Given the fundamental importance of waterside sites in commercial use to the Broads (and the limited availability of such sites) diversification needs to be about varying what is on offer rather than whole scale change of what is offered at the site and the policies address this.*

- iii. *If the Inspector is minded to suggest a definition of 'waterside site in commercial use' to be included in the policy in order to identify to which sites this policy refers, then a suggested definition is 'B1, B2 or B8 uses or ancillary A1 land use on the waterside'.*
  - iv. *Turning to the scale, type and form of development that would be permitted as part of a diversification, in relation to PUBDM27, this is set out in the second part of the policy and proposals will also need to be assessed using the other policies in the employment section (namely PUBDM24, 25, 26). What is acceptable will depend on what is already in place, the location and the site-specific constraints. It is therefore difficult to construct a policy that applies over the entire area and a criterion based approach is considered more useful.*
- d) Is the Plan's approach to new employment development and diversification, as established in Policies PUBDM24 and PUBDM26, justified, effective and consistent with national guidance<sup>1</sup>?
- i. Does Policy PUBDM24 provide sufficient protection for the natural and historic environment?
    - A. *The Authority would like to add a change to PUBDM24 to reinforce the protection to the natural environment – see details below under B). The Authority could also add a reference to the historic environment to reinforce its protection – see C) below.*
    - B. *The RSPB has requested an amendment (LP-PUB4, page 55, rep number 107) which seems reasonable and can be taken forward. See proposed change 55 (LP-SUB2) which will address their concerns and ensure there is sufficient protection.*
    - C. *Following on this proposed change, and to respond to the Inspector, the Authority would agree that an additional mention to the historic environment is also added to policy PUBDM24. It could be amended to say 'Proposals do not have an adverse impact on landscape character, designated sites and biodiversity or the historic environment'*
  - ii. Does Policy PUBDM26 provide clear guidance on the type and scale of uses and the amount of new build development permitted, and in the case of farm shops, the proportion of goods that should be produced on the farm?
    - A. *PUBDM26 needs to be read alongside the other policies in the Economy Section of the Local Plan. What is acceptable in terms of type, scale and amount will depend on what is already in place, the location and the site-specific constraints. It is therefore difficult to quantify in a policy that applies to the entire area. That is why the policy requires new build development to be fully justified.*

---

<sup>1</sup> Also see Matter 2k.

B. *Regarding farm shops, the wording of PUBDM26 was rolled forward from the Development Management DPD.*

C. *It is noted that Exmoor National Park Authority in their adopted Local Plan take a similar approach<sup>2</sup>:*

*'Proposals for new local commercial service provision in the open countryside, through the reuse of existing buildings, will only be permitted in accordance with SE-S3 Business Development in the Open Countryside, and where:*

- a) they are small scale ancillary retail development/operations principally offering for sale goods which are produced at the premises; or*
- b) they principally comprise the sale of crafts and goods made on site, or shops and/or cafés which are ancillary to farms, visitor facilities, or camping and caravan sites; and*
- c) they will not have adverse impacts on adjoining land uses; and*
- d) it can be demonstrated that they will not adversely affect service provision in nearby settlements'.*

D. *To respond to the comment raised by the Inspector on PUBDM26, this policy could be amended. The sentence 'Farm shops will only be acceptable where a significant proportion of the range of goods for sale is produced on the farm' could be replaced by 'Farm shops will only be acceptable if they principally offer the sale of goods produced on site' although neither approach has a numeric value or percentage included. It is noted that this suggestion is based on wording used in a recently adopted Local Plan.*

e) Are Policies PUBDM28 and PUBDM29 on tourism and recreation development justified, effective and consistent with national guidance<sup>3</sup>?

i. Are the policies in line with paragraph 24 in the NPPF?

A. *The Authority confirms that these policies do not refer to the sequential test for town centre uses because of the unique characteristics of the Broads. PUBDM28 relates to sustainable tourism and recreation development, and PUBDM29 relates to holiday accommodation. For both, the sequential test would not be appropriate to support the provision of tourist and visitor facilities in appropriate locations, such as by the river or in rural areas, which are predominant in the Broads.*

B. *If NPPF Paragraph 24 was applied, this would mean that tourism and recreation development in the Broads could only happen in Oulton Broad District Shopping Centre, Hoveton Town Centre and to some extent Potter Heigham Bridge area and Horning Village Centre. It could be argued that this approach could be contrary to one of the statutory purpose of the*

---

<sup>2</sup> [http://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0008/1027718/ENP-Local-Plan-2011-2031-reduced-size.pdf](http://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0008/1027718/ENP-Local-Plan-2011-2031-reduced-size.pdf), page 187, HC-D18, 2)

<sup>3</sup> As above.

*Broads which is to promote opportunities for the understanding and enjoyment of the special qualities of the Broads by the public and that this applies across the Broads not just in the areas identified by Para 24. Whilst it is the case that the opportunity for tourism and recreational development is limited outside of the main areas of development, small facilities may be appropriate and the policy recognises that.*

*C. The existing attractions which tourism and recreation development promote in the Broads tend to be in rural areas or out of town centres like BeWILDerwood, Whitlingham Country Park and the actual rivers and Broads themselves. The policies in the Local Plan do meet NPPF Paragraph 28 and in particular bullet point three.*

ii. Is the proportion of new build development sufficiently clarified in criterion v) in Policy PUBDM28?

*A. The Authority would agree to add some wording to PUBDM28 to clarify the proportion of new build development. In terms of new build development, what is acceptable will depend on what is already in place, the location and the site-specific constraints. It is therefore difficult to quantify in a policy that applies to the entire area. Along the lines of the adopted Exmoor Local Plan<sup>4</sup> (RT-S1 h) this criterion could be amended to say 'they do not involve a significant amount of new build development. New build development will only be of a scale that is compatible with the location and setting.'*

iii. Is the demand test in criterion vii) and the brownfield first approach in Policy PUBDM28 justified?

*A. The brownfield land first approach is in conformity with the Core Planning Principles of the NPPF, particular Paragraph 17 bullet point 8 and paragraph 111. Furthermore, parts of the Broads are peat soils and high quality agricultural land which the Local Plan seeks to protect.*

*B. Policy DP14 of the Development Management DPD (AP2, page 32) had similar wording saying 'would not compromise existing tourism or recreation facilities in more sustainable locations'. Criterion vii) attempts to improve that wording. However it could be argued that the introductory wording to that part of the policy could be adequate as it says '...will only be permitted where there is a clear and demonstrable need for the facilities to be situated in the proposed location and...', and that criterion vii) is not necessary. Criterion vii) could also be straying into the issue of competition which is not strictly a planning consideration. It is proposed that vii) is removed.*

iv. Is the threshold of five bedspaces in Policy PUBDM29 justified?

*A. This approach was rolled forward from the Development Management DPD. On reflection it is proposed to remove the five bed spaces*

---

<sup>4</sup> [http://www.exmoor-nationalpark.gov.uk/data/assets/pdf\\_file/0008/1027718/ENP-Local-Plan-2011-2031-reduced-size.pdf](http://www.exmoor-nationalpark.gov.uk/data/assets/pdf_file/0008/1027718/ENP-Local-Plan-2011-2031-reduced-size.pdf)

*requirement and change the text to require the submission of viability evidence for any change of use or redevelopment of guest houses and hotels regardless of size.*

- v. Does Policy PUBDM29 only allow the loss of tourism accommodation where change of use to residential use is proposed?
  - A. *It is not uncommon to receive applications or enquiries to change the occupancy condition of holiday accommodation to allow permanent use, which reflects the attractiveness of the area as a place to live and the limited sites available for the provision of new permanent accommodation. It would be unusual to receive enquiries or applications to change holiday accommodation to a use other than permanent residential. So the policy wording seeks to address the common planning issues.*
  - B. *If a proposal was submitted seeking a change of use from holiday accommodation to a use other than permanent residential, it would be considered on its own merits relying on the other relevant policies in the Local Plan. The requirement for a viability report would be considered on a case by case basis.*
  
- vi. Are the requirements relating to static caravans in Policy PUBDM29 consistent with the approach to tourism development in Policy PUBDM28?
  - A. *There is one potential improvement for consistency between PUBDM29 and PUBDM28, and the Authority would agree to add a criterion to PUBDM29 to address this.*
  - B. *PUBDM29 refers to extensions, intensifications, upgrading or replacement to static caravan sites that are already in place. Whereas PUBDM28 refers to new sites for such a use. However on reflection, criterion xiii) in PUBDM28 could usefully be added to PUBDM29 as criterion h).*

**Appendix A: Indicative thresholds for transport assessments, Guidance on Transport Assessments, DfT, 2007. Used by Suffolk County Council and Norfolk County Council (although Norfolk County Council’s threshold for residential is now 100).**

## APPENDIX B

# Indicative thresholds for transport assessments

These thresholds are for guidance purposes and should not be read as absolutes. Local authorities may interpret them in light of their own circumstances. There are several qualitative factors that need to be taken into account and that are not captured by this document. There will also be site-specific issues that assessments will need to cover.

In some circumstances, a TA may be appropriate for a smaller development than suggested by the thresholds. In others, a TS may be appropriate for a larger development than suggested by the thresholds. Early pre-application discussions between a developer and the relevant authorities are strongly recommended. In these, it is important for highway authorities to combine the appropriate quantitative and qualitative thresholds in deciding the level of assessment that may be required.

Thresholds based on size or scale of land use						
	Land use	Use/description of development	Size	No assessment	TS	TA/TP
1	Food retail (A1)	Retail sale of food goods to the public – food superstores, supermarkets, convenience food stores.	GFA	<250 sq. m	>250 <800 sq. m	>800 sq. m
2	Non-food retail (A1)	Retail sale of non-food goods to the public; but includes sandwich bars – sandwiches or other cold food purchased and consumed off the premises, internet cafés.	GFA	<800 sq. m	>800 <1500 sq. m	>1500 sq. m
3	A2 Financial and professional services	Financial services – banks, building societies and bureaux de change, professional services (other than health or medical services) – estate agents and employment agencies, other services – betting shops, principally where services are provided to visiting members of the public.	GFA	<1000 sq. m	>1000 <2500 sq. m	>2500 sq. m
4	A3 Restaurants and cafés	Restaurants and cafés – use for the sale of food for consumption on the premises, excludes internet cafés (now A1).	GFA	<300 sq. m	>300 <2500 sq. m	>2500 sq. m
5	A4 Drinking establishments	Use as a public house, wine-bar or other drinking establishment.	GFA	<300 sq. m	>300 <600 sq. m	>600 sq. m
6	A5 Hot food takeaway	Use for the sale of hot food for consumption on or off the premises.	GFA	<250 sq. m	>250 <500 sq. m	>500 sq. m
7	B1 Business	(a) Offices other than in use within Class A2 (financial and professional services) (b) research and development – laboratories, studios (c) light industry	GFA	<1500 sq. m	>1500 <2500sq. m	>2,500 sq. m

<b>Thresholds based on size or scale of land use (continued)</b>						
	<b>Land use</b>	<b>Use/description of development</b>	<b>Size</b>	<b>No assessment</b>	<b>TS</b>	<b>TA/TP</b>
8	B2 General industrial	General industry (other than classified as in B1), The former 'special industrial' use classes, B3 – B7, are now all encompassed in the B2 use class.	GFA	<2500 sq. m	>2500 <4000 sq. m	>4000 sq. m
9	B8 Storage or distribution	Storage or distribution centres – wholesale warehouses, distribution centres and repositories.	GFA	<3000 sq. m	>3000 <5000 sq. m	>5000 sq. m
10	C1 Hotels	Hotels, boarding houses and guest houses, development falls within this class if 'no significant element of care is provided'.	Bedroom	<75 bedrooms	>75 <100 bedrooms	>100 bedrooms
11	C2 Residential institutions - hospitals, nursing homes	Used for the provision of residential accommodation and care to people in need of care.	Beds	<30 beds	>30 <50 beds	>50 beds
12	C2 Residential institutions – residential education	Boarding schools and training centres.	Student	<50 students	>50 <150 students	>150 students
13	C2 Residential institutions – institutional hostels	Homeless shelters, accommodation for people with learning difficulties and people on probation.	Resident	<250 residents	>250 <400 residents	>400 residents
14	C3 Dwelling houses	Dwellings for individuals, families or not more than six people living together as a single household. Not more than six people living together includes – students or young people sharing a dwelling and small group homes for disabled or handicapped people living together in the community.	Dwelling unit	<50 units	>50 <80 units	>80 units
15	D1 Non-residential Institutions	Medical and health services – clinics and health centres, crèches, day nurseries, day centres and consulting rooms (not attached to the consultant's or doctor's house), museums, public libraries, art galleries, exhibition halls, non-residential education and training centres, places of worship, religious instruction and church halls.	GFA	<500 sq. m	>500 <1000 sq. m	>1000 sq. m
16	D2 Assembly and leisure	Cinemas, dance and concert halls, sports halls, swimming baths, skating rinks, gymnasiums, bingo halls and casinos. other indoor and outdoor sports and leisure uses not involving motorised vehicles or firearms.	GFA	<500 sq. m	>500<1500 sq. m	>1500 sq. m
17	Others	For example: stadium, retail warehouse clubs, amusement arcades, launderettes, petrol filling stations, taxi businesses, car/vehicle hire businesses and the selling and displaying of motor vehicles, nightclubs, theatres, hostels, builders' yards, garden centres, POs, travel and ticket agencies, hairdressers, funeral directors, hire shops, dry cleaners.	TBD	Discuss with appropriate highway authority	Discuss with appropriate highway authority	Discuss with appropriate highway authority



<b>Thresholds based on other considerations</b>				
	<b>Other considerations</b>	<b>TS</b>	<b>TA</b>	<b>TA/TP</b>
1	Any development that is not in conformity with the adopted development plan.			✓
2	Any development generating 30 or more two-way vehicle movements in any hour.		✓	
3	Any development generating 100 or more two-way vehicle movements per day.		✓	
4	Any development proposing 100 or more parking spaces.		✓	
5	Any development that is likely to increase accidents or conflicts among motorised users and non-motorised users, particularly vulnerable road users such as children, disabled and elderly people.			✓
6	Any development generating significant freight or HGV movements per day, or significant abnormal loads per year.		✓	
7	Any development proposed in a location where the local transport infrastructure is inadequate. – for example, substandard roads, poor pedestrian/cyclist facilities and inadequate public transport provisions.		✓	
8	Any development proposed in a location within or adjacent to an Air Quality Management Area (AQMA).		✓	