

Duty to Cooperate
Statement of Common Ground
Between the Broads Authority and East Suffolk Council
February 2026

1. Introduction

Part of the Broads Authority Executive Area overlays part of East Suffolk Council. The Broads Authority is the Local Planning Authority for that area, but East Suffolk Council undertake all other Local Authority functions, such as elections, waste collection and they are the Housing Authority.

This Statement of Common Ground relates to the Duty to Cooperate – it sets out how the Broads Authority and East Suffolk Council cooperate on strategic cross-boundary matters. It is produced to support the production of the Local Plan for the Broads. In relation to the Broads Local Plan it updates and replaces the Duty to Cooperate Statement dated January 2018, agreed between the Broads Authority and the former Waveney District Council.

2. Waveney Local Plan

East Suffolk Council was created on 1st April 2019 and covers the area of the former Suffolk Coastal and Waveney District Councils. The Broads Authority Executive Area partly falls/fell within the former Waveney District part of East Suffolk.

There are two local plans that cover East Suffolk - the Waveney Local Plan (2019) and the Suffolk Coastal Local Plan (2020). The Waveney Local Plan is of relevance to the Broads – indeed, the Local Plan for the Broads defers to/has regard to some policies of the Waveney Local Plan; namely open space, affordable housing and retail.

3. Meetings

Three to four times a year, there is an officer meeting between Great Yarmouth Borough Council, East Suffolk Council, Norfolk County Council, Suffolk County Council and the Broads Authority that relates to cross boundary matters. Great Yarmouth Borough and East Suffolk border each other with the Broads Authority being the Local Planning Authority for part of Great Yarmouth Borough and East Suffolk. At these meetings, general cross boundary issues are discussed, as well as specific settlement or transport corridor issues.

Around twice a year, there is a meeting between Norfolk Local Planning Authorities and Suffolk Local Planning Authorities. This includes Great Yarmouth, South Norfolk and East

Suffolk Councils which the Broads Authority is the Local Planning Authority for part of. At these meetings, general cross boundary issues are discussed, as well as specific settlement or transport corridor issues.

Suffolk Local Planning Authorities tended to meet together around 5 times a year. The group includes Heads of Development Management and Heads of Planning Policy. Since the start of 2025, the two areas of work have split and have separate development management and policy meetings. Again, general cross boundary issues are discussed as well as location-specific issues. The group also discusses issues such as Biodiversity Net Gain and changes to the planning system.

The Broads Authority and East Suffolk Council agree that both parties have cooperated well during the production of the Broads Local Plan as well as in relation to other wider planning matters and the meetings are central to that cooperation.

4. Suffolk LPAs and new-style Local Plans

During 2025, the Local Planning Authorities in Suffolk have started to work together on new style Local Plans. An approach to aligned working has been agreed via the Suffolk Chief Officers Leadership Team. Various subgroups have been established including stakeholder engagement, call for sites and sustainability appraisal. All Suffolk Local Planning Authorities are represented on each group. Whilst the Broads Authority is at Regulation 19 and producing a Local Plan under the current plan-making system, in line with the 2024 NPPF, the Authority still takes part in these group meetings.

5. Housing Need

The housing need for the Broads is set out in the following table:

District	Objectively Assessed Housing Need	Annual average from 2021 to 2042 (21 years)
Broadland	316	15.05
North Norfolk	293	13.95
Norwich	17	0.81
South Norfolk	204	9.71
Great Yarmouth	177	8.43
East Suffolk	70	3.33
Total:	1,077	49

The housing need for the Broads Authority is part of the need of East Suffolk (and indeed, the other 5 constituent Districts). The Broads Authority's need is not additional to this. In recognition of this, and to reflect the special qualities of the Broads, if the full need of 70

dwellings cannot be met through completions in the Broads, then housing completions in East Suffolk outside of the Broads would be needed to ensure that the East Suffolk requirement is met. This is set out in detail in a letter from East Suffolk Council dated May 2025 at Appendix A.

The Broads Authority has undertaken three calls for sites during the production of the emerging Local Plan. No suitable new sites for housing have come forward. There are no new housing allocations in the emerging Local Plan for the Broads.

The Broads Authority will, and does, permit applications for new housing when they meet policy requirements. There has been, and will be, windfall sites that come forward over the plan period. The following table sets out permissions and completions between April 2021 and April 2025.

District	Completions	Permitted	Allocations	Total
Broadland	0	5	0	5
North Norfolk	5	4	0	9
Norwich	0	0	0	0
South Norfolk	7	1	0	8
Great Yarmouth	1	12	0	13
East Suffolk	3	5	0	8
Totals	16	27	0	43

Given that there are no new allocations for housing in the emerging Broads Local Plan and noting the permissions and completions to date and anticipating that more will come forward over the plan period, as set out in the letter at Appendix A, East Suffolk Council will meet the residual housing need for the Broads that is not addressed within the Broads Authority Executive Area if needed.

The Broads Authority and East Suffolk Council agree that housing completions in the Broads Authority area count towards East Suffolk Council’s housing need.

The Broads Authority agrees to report housing completions in the East Suffolk part of the Broads to East Suffolk Council, and these are counted towards East Suffolk Council’s housing delivery.

The Broads Authority agrees to report housing permissions in the East Suffolk part of the Broads to East Suffolk Council, and these are counted towards East Suffolk Council’s housing supply. This includes developments granted permission prior to 1.4.2021 and therefore not included in the need for 70 dwellings.

6. Residential moorings

A need for residential moorings for the Broads Authority Executive Area has been identified. This is 48 residential moorings. Through the call for sites and rolling forward sites from the current Local Plan for the Broads, there are enough allocations to meet 43 of the 48 residential moorings.

East Suffolk Council, as part of producing the new style Local Plan for their area, will assess the need for those residing on boats. The need for the River Waveney is being met by the Broads Authority, as that river is within the Broads Authority Executive Area. There is no unmet need arising from the Broads Authority Executive Area to be met by East Suffolk Council. But there are other navigable rivers in East Suffolk Council's area.

East Suffolk Council and the Broads Authority agree with the need for residential moorings as identified through the production of the emerging Local Plan for the Broads.

7. Suffolk Coast RAMS

Part of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy area covers part of the area in East Suffolk where the Broads Authority is the Local Planning Authority. The Broads Authority has and will continue to apply the RAMS approach and liaise with East Suffolk Council. The scheme seeks to mitigate and manage the recreation impact of occupiers of new houses on protected wildlife sites. More background information can be found here: [Habitats Regulations Mitigation \(RAMS\) | East Suffolk Council](#).

East Suffolk Council and the Broads Authority will continue to work together to apply the Suffolk RAMS scheme.

8. Deferring to/having regard to some policies/SPDs of East Suffolk Council

As mentioned previously, the Local Plan for the Broads defers to/has regard to the policies and approaches of some policies of East Suffolk Local Plan (and indeed the Local Plans of the other 5 constituent districts). These are in relation to open space, affordable housing and retail. This approach is logical as:

1. For affordable housing, East Suffolk Council are the Housing Authority. Furthermore, the need for affordable housing is East Suffolk Council-wide and there is no logic in a different standard being set for the part of East Suffolk that is the Broads.
2. For open space, the areas to be protected and the standards for new development are assessed and calculated district wide.
3. For retail, the need for retail is calculated district wide, and Oulton Broad District Centre is part in the Broads and part in East Suffolk.

East Suffolk Council produced two Supplementary Planning Documents (SPDs) which relate to affordable housing and open space. These are linked below. The Broads Authority have endorsed these SPDs as, stated above, these are relevant to any schemes in the Broads Authority Executive Area that relate to affordable housing and open space.

- [Affordable-Housing-SPD.pdf](#) (2022)
- [Healthy-Environments-SPD-Adoption-version.pdf](#) (2024)

East Suffolk Council agrees to support and advise the Broads Authority as decision-maker to assist in ensuring schemes adequately provide/adequately protect affordable housing, open space and retail.

9. Coastal Adaptation SPD

In recognition that coastal change does not respect Local Planning Authority boundaries, Great Yarmouth Borough Council, North Norfolk District Council, East Suffolk District Council, the Broads Authority, and Coastal Partnership East worked together to produce this SPD that has since been adopted. [Coastal Adaptation Supplementary Planning Document](#) (2023).

East Suffolk Council and the Broads Authority agree to use the Coastal Adaptation SPD in decision making as relevant.

10. Health Protocol

The [Planning in Health Protocol](#) (2024) presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Council Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly consult to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments.

East Suffolk Council and the Broads Authority agree to use the Planning in Health Protocol in decision making functions.

11. Conclusion

East Suffolk Council and the Broads Authority have a long-standing working relationship. As this Statement of Common Ground sets out, we work closely together on cross boundary issues ranging from housing need to impacts on biodiversity.

For East Suffolk Council: Ben Woolnough, Head of Planning and Building Control, 12 February 2026

For Broads Authority: Ruth Sainsbry, Head of Planning, 12 February 2026

Appendix A – Duty to Cooperate letter from East Suffolk in relation to housing need:

Natalie Beal
By email only: natalie.beal@broads-authority.gov.uk

Date: 19th May 2025
Please ask for: Dickon Povey
Direct dial: 01502 523043
Email: dickon.povey@eastsoffolk.gov.uk

Dear Natalie Beal,

The Local Plan for the Broads Review – Housing need

This letter is provided to set out East Suffolk Council's position in relation to the Broads Authority's housing need in the context of the preparation of the Broads Local Plan. This letter updates the letter dated 10th January 2025.

By way of context, East Suffolk Council has two Local Plans – the Waveney Local Plan (March 2019) and the Suffolk Coastal Local Plan (September 2020). The Waveney Local Plan covers the former Waveney District, excluding the part within the Broads. The Broads Local Plan defers to/has regard to the open space, retail and affordable housing policies of the Waveney Local Plan for the parts of the Broads in East Suffolk. The Suffolk Coastal Local Plan covers the former Suffolk Coastal District, which the Broads does not overlap with. East Suffolk Council was formed in April 2019, comprising the former Council areas of Waveney District and Suffolk Coastal District.

We reviewed the Waveney Local Plan, under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, in March 2024 which concluded that an update was not required. Following the Government's introduction of the revised standard method in December 2024, and resulting increase in housing number for East Suffolk, an addendum to the Waveney Local Plan review assessment was produced in March 2025 which concludes that the plan does need to be updated. The assessment and addendum can be read here: www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/.

The Council aims to act positively around having up to date plans in place. In the context of recent reforms to the plan-making process, our March 2025 Local Development Scheme envisages commencing formal stages of preparation of a new Local Plan for East Suffolk outside of the Broads from later in 2025. However, early preparations for commencing a review are set out to take place in the short term during 2025/26, including evidence scoping / gathering and early engagement. The next Local Plan is anticipated to be an East Suffolk Local Plan (i.e. covering the areas currently covered by the Waveney Local Plan and Suffolk Coastal Local Plan). This is set out in the Council's Local Development Scheme which is available here: www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/statement-of-community-involvement-and-local-development-scheme/

The five year housing land supply for the Waveney Local Plan area of East Suffolk is 3.33 years as at March 2025 following publication of the Interim Housing Position Statement which can be viewed here: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/>. The Interim Housing Position Statement updated the land supply calculations set out in the latest Statement of Housing Land Supply (November 2024) which is available here: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/>

A statement of Common Ground between the Broads Authority and the (then) Waveney District Council in relation to housing need and delivery was signed in January 2018. This letter does not replace that Statement of Common Ground, which relates to the current adopted 2019 Broads Local Plan and the current adopted 2019 Waveney Local Plan. This letter relates to the review of the Local Plan for the Broads which, at the time of writing, was approaching Regulation 19 consultation stage.

Based upon the evidence contained in the Broads Authority: Local Housing Needs Assessment Update (2025) we are comfortable with the 70 dwellings housing requirement proposed for the East Suffolk part of the Broads over the plan period 2021 to 2042, as identified in the Local Housing Needs Assessment 2025 Update for the Broads. We understand that this makes up part of the housing requirement for East Suffolk, and is not additional to it, although some of this need goes beyond the Waveney Local Plan period which ends in 2036. This is as set out on page 183 of the Broads Preferred Options Local Plan (February 2024) which states “For the avoidance of doubt, each element of the Broad’s Objectively Assessed Need identified in the table above for each of the six districts also forms part of each district’s objectively assessed need and is not additional to.”

We are aware that the Broads Authority as a Local Planning Authority take decisions to permit housing development. Where these are in the East Suffolk part of the Broads, these will continue to count towards meeting the housing requirement in the Waveney / East Suffolk area, and permissions in the Broads will similarly continue to be accounted for in the Waveney / East Suffolk Housing Land Supply.

It is understood that the need of 70 dwellings is net of permissions in place prior to 1st April 2021. However, completions arising from permissions in place prior to 1st April 2021 will nevertheless also make up part of meeting the housing requirement for Waveney / East Suffolk.

You have undertaken three ‘call for sites’ to help identify suitable sites for housing, including a call for sites undertaken during November / December 2024. It is understood that through the third ‘call for sites’ undertaken in December 2024 no sites suitable for development came forward in the East Suffolk area of The Broads and none are therefore proposed for allocation.

The Broads status is equivalent to a National Park, plus constraints such as sensitive landscapes and geography which is susceptible to flooding, act as constraints to the delivery of your housing requirement. We recognise that the vast majority of the East Suffolk area of The Broads is in Flood Zone 3, has landscape and heritage sensitivity or is unsuitable for allocations to accommodate 70 dwellings.

Your Preferred Options plan includes only one allocation for mixed use development that could include housing (the Utilities Site in Norwich), which will come forward later in the plan period.

We acknowledge that the 2024 National Planning Policy Framework states inter alia at para. 61: *“The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.”* East Suffolk Council expects that all efforts are made to accommodate the Broads Authority’s housing need in the Broads area. However, it is acknowledged that as housing completions and supply in the East Suffolk part of the Broads contribute towards meeting the housing requirement for East Suffolk (the Waveney Local Plan requirement), if the full residual need of 62 dwellings cannot be met through completions in the Broads, then housing completions in East Suffolk outside of the Broads would be needed to ensure that the East Suffolk requirement is met. It is expected that this will be more formally established as part of Duty to Co-operate discussions with East Suffolk Council to inform the preparation of the East Suffolk Local Plan.

You have confirmed that there will be one more year of monitoring housing permissions and completions in the Broads Authority area before the Local Plan is adopted, and that this is expected to slightly reduce the residual housing need number for the remainder of the plan period.

This letter represents the Council’s position based on the current national and local planning policy context.

In summary:

- East Suffolk Council are comfortable with the 70 dwellings housing requirement proposed for the East Suffolk part of the Broads over the plan period 2021 to 2042. We understand that this makes up part of the housing requirement for East Suffolk, and is not additional to it, although some of this need goes beyond the Waveney Local Plan period which ends in 2036.
- East Suffolk Council expects the Broads Authority will make all efforts to accommodate the Broads’ housing needs, however it will meet any residual housing need for the East Suffolk part of the Broads that is not addressed within the Broads Authority Executive Area during the plan period, if needed.
- In our future Local Plan review, should it be evident that this residual need still exists in the East Suffolk part of the Broads, we may look to identify opportunities close to the Broads, taking account of the role of settlements in this part of East Suffolk in meeting local housing needs alongside constraints presented such as flood risk.

I trust the above is of assistance and we are committed to working with you in future under the Duty to Cooperate.

Yours sincerely,

**Ben Woolnough | Head of Planning, Building Control and Coastal
Management**
East Suffolk Council