



# Housing Need Topic Paper

## Local Plan for the Broads

**January 2026**

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# 1 Introduction

This Topic Paper explains the housing need to be addressed in the Local Plan for the Broads review as well as explains how this will be met.

## 2 Identifying Housing need

### 2.1 Market housing

The housing need for the Broads Authority has been identified by ORS consultants. The report can be found here: [Housing needs assessment \(June 2022\)](#) and [Local Housing Needs Assessment Addendum \(March 2025\)](#). The addendum reflects the change introduced by the current Labour Government to use housing stock rather than population projections. The report identifies the need as follows:

District	Objectively Assessed Housing Need	Annual average from 2021 to 2042 (22 years)
Broadland	316	14.37
North Norfolk	293	13.32
Norwich	17	0.77
South Norfolk	204	9.27
Great Yarmouth	177	8.05
East Suffolk	70	3.18
<b>Total:</b>	<b>1,077</b>	<b>49</b>

It should be noted that the housing need that has been identified is part of our 6 constituent districts' need and not additional to.

Furthermore, please note that in calculating the housing need, the consultants factored in holiday homes. Therefore, holiday homes count towards the need. This does not include glamping provision such as Shepherd's Huts.

### 2.2 Residential moorings

The residential moorings need for the Broads Authority has been identified by RRR consultants. The reports can be found here: [Residential Mooring needs assessment \(August 2022\)](#) and [clarification letter \(May 2025\)](#).

The report identifies the need as 48 residential moorings.

### 2.3 Gypsy and Traveller

The Gypsy, Traveller and Travelling Showpeople need has been identified, first by RRR and then checked and updated by ORS Consultants. The reports can be found here: [Gypsy and Traveller and Residential Caravans Need Assessment \(Great Yarmouth Borough only\) \(June 2022\)](#), [Great Yarmouth Gypsy and Traveller Accommodation Assessment \(GTAA\) Update \(September 2024\)](#) and [addendum \(May 2025\)](#) as well as [Broads Authority GTAA Review \(December 2024\)](#).

The studies tended to focus on Great Yarmouth Borough as that is where a need was identified. The May 2025 addendum reflects the change in the definition of Gypsy and Travellers. The December 2024 document addresses the need for the rest of the Broads.

The reports identify the needs as follows:

- Travelling Showpeople – 0
- A 5-year need for the Broads part of Great Yarmouth is 10 pitches. Future (beyond 6 years) need for the Broads part of Great Yarmouth borough is 4 pitches.
- Need for the rest of the Broads – 0

## 2.4 Residential caravans

The residential caravan need for the Broads Authority has been identified by RRR consultants. The report can be found here: [Great Yarmouth and Broads Authority GTRCAA](#).

The report identifies a need of 12 residential caravans in Great Yarmouth Borough. This reflects that the Authority is not aware of caravans being lived in that are non Gypsy and Traveller as well as reflecting unauthorised caravans in an area of the Broads in Great Yarmouth Borough.

# 3 Meeting Housing Need

## 3.1 Three calls for sites

Despite three calls for sites<sup>1</sup>, no new suitable sites for market housing, Gypsy and Travellers or residential caravans have come forward.

The sites that came forward can be found here:

- [Housing and Economic Land Availability Assessment \(HELAA\) \(September 2023\)](#) and [HELAA part 2 \(February 2025\)](#)

A summary of if a site was taken forward for allocation or not and the reasons found here:

- [From HELAA to Local Plan \(September 2023\)](#) and [From HELAA to Local Plan part 2 \(February 2025\)](#)

As can be seen, the common reasons for not allocating the sites that came forward were; highways objections, landscape/townscape character impact, lack of services and facilities within walking distance from the site, flood risk, loss of marsh and habitat, best and most

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<sup>1</sup> Issues and Options consultation, November/December 2022, included a call for sites for residential dwellings, residential moorings (both Broads-wide) and gypsy and traveller sites and residential caravans (both in Great Yarmouth Borough only). Preferred Options consultation, April/May 2024, included a call for sites for residential dwellings, gypsy and traveller sites and residential caravans (not residential moorings as we had met the need at that time). In December 2024, we undertook a standalone call for sites for residential dwellings, residential moorings, gypsy and traveller sites and residential caravans.

versatile land, heritage impacts and lack of marketing. This reflects the constrained nature of the Broads.

Sites for residential moorings have been allocated in the Local Plan.

### 3.2 Market housing

#### a) Two sites allocated in the Local Plan

The two sites that are allocated in the Local Plan (Policy PUBTHU1: Tourism development at Hedera House, Thurne for 6 market dwellings and 10 holiday homes and Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site for 76 dwellings) are not new allocations and they have extant planning permission. These policies are included in the emerging Local Plan in case the applicant seeks to change the permitted scheme. If the schemes have been completed on nearing the adoption of the Local Plan, the policies could be removed.

#### b) Broads Authority owned land

In terms of considering Broads Authority owned land for development, the Broads Authority only owns small parcels of land, and these are in locations that would be subject to the same constraints as those put forward in the call for sites and are not suitable for development. The main ones would be landscape character impact, flood risk and impact on navigation (as we own and operate moorings).

#### c) Duty to Cooperate

The [Norfolk Strategic Planning Framework - Shared Spatial Objectives and Statement of Common Ground for a Growing County](#) (2025) (NSPF) has been endorsed by all Norfolk Local Planning Authorities. The aims of this document are 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 (or any successor approach requiring strategic cooperation) and consistency with the NPPF;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high-level plans such as Local Economic and Infrastructure Strategies and;
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

The NSPF includes a series of agreements. Two are relevant to meeting the housing need of the Broads Authority:

- Agreement 10 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.
- Agreement 11 - 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.

Every effort has been made to identify and allocate land for residential dwellings as set out in Agreement 10. But given that no suitable sites have come forward Agreement 11 is enacted.

A smaller part of the Broads is within Suffolk and a bespoke agreement with East Suffolk Council has been produced –see Appendix 4 of [Broads Authority Duty to Cooperate Statement](#). In summary:

- East Suffolk Council is 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 41 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.

It should be noted that there are 4 areas with development boundaries within the Broads where market dwellings would be appropriate, subject to details, this could result in more dwellings over the plan period.

And, in terms of holiday accommodation, there are different locational criteria which could result in more dwellings over the plan period.

### 3.3 Residential moorings

Following three calls for sites and rolling forward of the currently adopted residential mooring policies, the following table shows the sites that are intended to be allocated for residential moorings.

Site	Number of residential moorings
Brundall Gardens Marina – small marina	2
Brundall Gardens Marina – large marina	6
Greenway Marine, Chedgrave	5
Hipperson’s Boatyard, Gillingham	5
Somerleyton Marina	15
Richardson’s Boatyard, Stalham Staithe	10
<b>Total:</b>	<b>43</b>

It shows a total of 43 residential moorings are allocated and the need to be addressed in the Local Plan is 48 residential moorings. The Local Plan is therefore 5 short of meeting the need of 48 residential moorings.

It is envisaged that during the plan period, more residential mooring schemes may come forward, and these would be assessed using the development management policies of the Local Plan and in particular Policy PUBDM46: New residential moorings. The locational criteria in PUBDM46 does mean that there are opportunities for residential moorings on sites that have not been allocated and these could come forward over the plan period.

### 3.4 Gypsy and Traveller

As discussed, despite three calls for sites, no Gypsy and Traveller sites have come forward in the Broads part of the Borough of Great Yarmouth.

There are early discussions ongoing relating to a potential Gypsy and Traveller site, but we need to understand flood risk implications and so there are no guarantees this site will be deemed suitable. This particular site would be ideal in terms of access to highways, services and facilities by walking and no obvious landscape impact concerns. We will continue to liaise with the promoter.

In terms of the future need, beyond 5 years, there is a development management policy to help guide proposals if they were to come forward.

### 3.5 Residential caravans

As discussed previously, despite three calls for sites, no residential caravan sites have come forward.

Such schemes would be assessed using the housing policies of the Local Plan (and other relevant policies).

There are 4 areas with development boundaries within the Broads where such caravans would be appropriate, subject to details, which could result in more dwellings over the plan period.

## 4 Windfall

We do not consider windfall predictions in meeting the residual need for the varying housing types. This is because the overall numbers are very low and a small variation of approved dwellings/residential moorings/caravans each year is a large proportion as demonstrated below using housing permitted since May 2019 (adoption date of the current Local Plan):

2019/20: 21 dwellings

2020/21: 7 dwellings

2021/22: 21 dwellings

2022/23: 3 dwellings

2023/24: 7 dwellings

2024/25: 2 dwellings

It should be noted that in March 2022, the issue of nutrient enrichment has had an impact on housing delivery.

When this data is assessed:

- Average: 10.17 dwellings
- Range: 2 to 21 dwellings
- Least as a proportion of the average: 2 dwellings is 20% of the average 10.17 dwellings.
- Most as a proportion of the average: 21 dwellings is 206.5% of the average of 10.17 dwellings.

While the Broads Authority does not consider the potential for windfall in calculations for meeting the various housing needs, schemes do come forward that are not allocated in the Local Plan. Given the locational criteria for the various housing need types, there is still potential for windfall sites to come forward over the plan period.

## 5 Constraints

Fundamentally, the Broads is a heavily constrained area. The Broads is an internationally important wetland and designated protected landscape of the highest order, with a status equivalent to that of a National Park and one of Europe's finest and most important wetlands for nature conservation. Its rich mosaic of habitats comprises, among other things, saltmarshes, intertidal mudflats, shallow lakes, fens, drained marshland, wet woodland, relict estuary and coastal dunes. The Broads' iconic features include 125 miles of lock free waterways, over 25% of the UK's conservation priority wildlife, and more than 60 drainage mills that are still intact. This section gives some background about the area's history and environment.

## 5.1 Special Qualities

The [Broads Plan](#) sets out the special qualities of the Broads. Over the years, the Authority has asked people to identify the special qualities or features of the Broads they value most.

Common responses include:

- The winding rivers and open water bodies – the ‘broads’
- The variety of habitats
- The abundance and rich diversity of wildlife
- Navigable, lock-free waterways to explore and enjoy
- The variety of patterns and textures in the landscape
- Countryside access to both land and water
- ‘Big sky’ views, dark skies and a sense of remoteness, tranquillity and wildness
- The people, the visitors, the activities
- The history and historic environment: Earth heritage, heritage assets, archaeology
- Boating, boatbuilding and unique heritage fleets
- Cultural assets, skills and traditions such as thatching and millwrighting
- People’s interactions with the landscape
- Waterside settlements and quiet villages

## 5.2 Biodiversity

The Broads is one of Europe’s most important wetlands for biodiversity and nature conservation. It is a predominantly freshwater ecosystem made up of meandering rivers connecting beautiful expanses of shallow water known as ‘broads’. The surrounding habitats include botanically rich fens, home to the rare Swallowtail Butterfly, Fen Orchid, and Bittern. The invertebrate and bird rich wet woodlands, and the grazing marshes with their network of unique aquatic plant and animal ditch communities, make the Broads one of the most wildlife rich areas in the National Park family and in the UK. The great importance for biodiversity is reflected in records for the Broads, which indicate:

- Around 25% of the Broads is designated for its international and nationally conservation status.
- 11,067 species.
- 19% of total protected species in the UK and 26% of the UK’s Biodiversity Action Plan species and 17% of all nationally notable or scarce species.
- 1,519 priority species, including 85% of Red and 94% of Amber designated UK bird species.
- Nineteen Global Red Data Book species.
- A wide range within taxonomic groups: e.g. 403 species of beetle, 251 species of fly and 179 species of moth.
- 66 Broads Speciality species: 14 species entirely, and 17 largely, restricted to the Broads in the UK, and 35 with its primary stronghold in the area.

### 5.3 Geodiversity

In relation to geodiversity, there are five nationally designated sites (SSSIs covering Pleistocene geology and active coastal processes), but many other local sites of interest have been identified in the Norfolk Geodiversity Audit.

### 5.4 Heritage

The Broads Authority Executive Area contains over 278 nationally Listed Buildings, 15 Scheduled Monuments and 25 Conservation Areas. The area has been identified by Historic England as being a site of exceptional potential for waterlogged archaeology, and the Broads Authority maintains a Local List of heritage assets.

### 5.5 Flood risk

Approximately 82.46% of the Broads Authority Executive Area is covered by flood zone 3 (3, 3a & 3b). This equates to 24,894.6 hectares. The Broads Authority boundary is tightly drawn around the edge of the floodplain. The extent and nature of flood risk, with significant areas of 'functional floodplain', mean that flood risk is a major constraint on development in the Broads.

The flood risk in the Broads is mainly from both fluvial and tidal sources, and the whole character and development in the Broads over many hundreds of years has been closely associated with the water environment and flood risk. Much of the area is defended by flood defence embankments, maintained by the Environment Agency. The flood defences, where they exist, only reduce the risk of flooding and will never eliminate it, and the risk of overtopping or a breach of defences remains.

### 5.6 Landscape

The Broads is much changed by people over time and is of international historic and cultural significance. Having been awarded status equivalent to a national park, the highest status of protection is conferred upon the area's landscape and natural beauty. The Broads is a low-lying wetland mosaic of flooded former peat workings (shallow lakes or 'broads') of various sizes, river channels, reed swamp, fen, reedbed, carr woodland and drained grazing marsh, arable cultivation with some heath and sand dune. It also includes a small stretch of undeveloped coastline near Horsey and Winterton.

## 6 Summary and key messages

- i. Despite three calls for sites, the Local Plan for the Broads does not allocate any new dwellings. The housing need that is identified for the Broads is part of the overall need for the 6 constituent districts. Through the Duty to Cooperate, the 6 constituent districts have agreed to meet for the need for the Broads.
- ii. Despite three calls for sites, the Local Plan for the Broads does not allocate any new Gypsy and Traveller sites. A windfall site could have potential to address the Gypsy and Traveller need for the Broads, but flood risk needs to be understood.

- iii. Despite three calls for sites, the Local Plan for the Broads does not allocate residential caravans.
- iv. In terms of residential moorings, the Local Plan for the Broads allocates 43 out of the need of 48.
- v. For all types of development, there are locational criteria and development management policies to guide any windfall development. There are 4 development boundaries in the Local Plan.
- vi. Calculations to meet the housing need of all housing types does not include windfall predictions. This is because the numbers are so low and the variation year on year is a large percentage difference. But the Authority does permit schemes, and more windfall schemes are likely to come forward over the plan period.
- vii. The Broads is constrained as a result of flood risk, wildlife, landscape character and heritage. This is demonstrated by the ability of the Broads Authority to nearly meet the entire need for residential moorings while it is not able to allocate new dwellings; residential moorings and the associated boats are part of the character of the Broads and are deemed acceptable to be lived on in flood risk zones (with the river/water body being classed as 3b).