

Planning Committee

Agenda 02 February 2024

10.00am

The King's Centre, 63-75 King Street, Norwich, NR1 1PH

John Packman, Chief Executive – Friday 26 January 2024

Under the Openness of Local Government Bodies Regulations (2014), filming, photographing and making an audio recording of public meetings is permitted. These activities however, must not disrupt the meeting. Further details can be found on the [Filming, photography and recording of public meetings](#) page.

Introduction

1. To receive apologies for absence
2. To receive declarations of interest
3. **To receive and confirm the minutes of the Planning Committee meeting held on 05 January 2024** (Pages 3-11)
4. To note whether any items have been proposed as matters of urgent business
5. Chairman's announcements and introduction to public speaking
Please note that public speaking is in operation in accordance with the Authority's [Code of Practice for members of the Planning Committee and officers](#).
6. Request to defer applications included in this agenda and/or vary the order of the agenda

Planning and enforcement

7. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**
There are no applications for consideration.
8. **Enforcement - Holly Lodge, Coltishall - replacement windows in Listed Building**
(Pages 12-20)
Report by Head of Planning
9. **Enforcement update** (Pages 21-27)
Report by Head of Planning

Tree Preservation Orders

10. **BA/2023/0022/TPO - An area of woodland on the northern bank of the river Waveney, south of Dunburgh** (Pages 28-34)
Report by Historic Environment Manager
11. **Tree Preservation Order - Proposed site visit - Crabbett's Marsh (BA/2023/0027/TPO)**
(Pages 35-42)
Report by Historic Environment Manager

Policy

12. **Thorpe St Andrew Neighbourhood Plan - Proceeding to referendum** (Pages 43-45)
Report by Planning Policy Officer
13. **Consultation responses** (Pages 46-52)
Report by Planning Policy Officer
14. **Local Plan – Preferred Options - Bitesize pieces** (Pages 53-309)
Report by Planning Policy Officer
15. **Levelling Up and Regeneration Act** (Pages 310-317)
Report by Head of Planning

Matters for information

16. **Notes of the Heritage Asset Review Group meeting held on 15 December 2023**
(Pages 318-323)
17. **Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q4 (1 October to 31 December 2023)** (Pages 324-330) Report by Planning Technical Support Officer
18. **Appeals to the Secretary of State update** (Pages 331-335)
Report by Head of Planning
19. **Decisions made by Officers under delegated powers** (Pages 336-339)
Report by Head of Planning
20. **To note the date of the next meeting – Friday 01 March 2024 at 10.00am at The King's Centre, 63-75 King Street, Norwich, NR1 1PH**

For further information about this meeting please contact the [Governance team](#)

Planning Committee

Minutes of the meeting held on 05 January 2024

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Present

Harry Blathwayt – in the Chair, Stephen Bolt, Bill Dickson, James Harvey, Martyn Hooton, Tim Jickells, Kevin Maguire and Keith Patience.

In attendance

Natalie Beal – Planning Policy Officer (items 10-12), Jason Brewster – Governance Officer, Kate Knights– Historic Environment Manager (item 9), Cally Smith – Head of Planning and Sara Utting – Senior Governance Officer

Members of the public in attendance who spoke

No members of the public in attendance.

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

Apologies were received from Tony Grayling, Leslie Mogford, Vic Thomson and Fran Whymark.

Openness of Local Government Bodies Regulations 2014

The Chair explained that the meeting was being audio-recorded. All recordings remained the copyright of the Broads Authority and anyone wishing to receive a copy of the recording should contact the Governance Team. The minutes remained the record of the meeting. He added that the law permitted any person to film, record, photograph or use social media in order to report on the proceedings of public meetings of the Authority. This did not extend to live verbal commentary. The Chair needed to be informed if anyone intended to photograph, record or film so that any person under the age of 18 or members of the public not wishing to be filmed or photographed could be accommodated.

2. Declarations of interest and introductions

Members indicated that they had no further declarations of interest other than those already registered.

3. Minutes of last meeting

The minutes of the meeting held on 08 December 2023 were approved as a correct record and signed by the Chair.

4. Matters of urgent business

There were no items of urgent business

5. Chair's announcements and introduction to public speaking

No members of the public had registered to speak.

The Chair raised a point of information regarding application BA/2023/0290/FUL – Geldeston - Angling platforms on river. Following the meeting on 8 December 2023, officers became aware of three references in the assessment section of the report which mistakenly used the word “acceptable” when it should have been “unacceptable”. This error related to paragraphs 6.21, 6.25 and 6.30 and the correct statements should have read “... would not result in an **unacceptable** impact...”. The officer apologised for this oversight but assured Members that the assessments for navigation, ecology and trees were correct and it was only the concluding paragraph for each which used the incorrect wording. Members had been fully apprised of the issues in the comprehensive report and this unfortunate oversight did not affect the decision taken.

6. Requests to defer applications and/or vary agenda order

No requests to defer or vary the order of the agenda had been received.

7. Applications for planning permission

There were no applications for consideration.

8. Enforcement update

Members received an update report from the Head of Planning (HoP) on enforcement matters previously referred to the Committee. Further updates were provided at the meeting for:

Land at the Beauchamp Arms Public House (Unauthorised static caravans) – The Hearing at Norwich Crown Court scheduled for 22 December 2023, had been cancelled by the Court on 21 December due to lack of court time. The HoP was waiting to hear from the Court when the rescheduled Hearing would take place and had been informed this would not be until 9 February 2024 at the earliest.

9. Tree Preservation Orders (proposed site visits) – Horsefen Road, Ludham and Dunburgh, Geldeston

The Historic Environment Manager (HEM) presented the report seeking Members’ views on whether to undertake site visits in relation to two Tree Preservation Orders (TPOs).

BA/2023/0020/TPO - Land at The Acorns, The Pines, Broadgate and Fen Hollow, Horsefen Road, Ludham

The HEM presented a location map, a site map and various photographs of some of the trees associated with provisional TPO BA/2023/0020/TPO that included a number of oak, alder and willow trees at land at The Acorns, The Pines, Broadgate and Fen Hollow, Horsefen Road, Ludham. This provisional TPO had been served as part of the Authority’s ongoing review of its existing portfolio of TPOs and, for efficacy, this provisional TPO had replaced three previous TPOs. The provisional TPO covered an area that included a mix of residential and holiday let chalets with individual trees dotted across a number of discrete properties and one group of

five oak trees at The Acorns, adjacent to Horsefen Road. The provisional TPO would need to be confirmed before it lapsed on 20 March 2024.

An objection had been received from the owners of The Acorns stating that one of the oak trees, which sits to the right hand side of the entrance to their driveway, restricted vehicular access to the drive. Given the growth of the tree and increased traffic on Horsefen Road, since the tree was first protected by a TPO, it was harder to gain entry and leave the property and the objector would like to remove the tree.

The objection had been received within the 28-day consultation period and as per the Authority's Scheme of powers delegated to the Chief Executive and other officers, paragraph 50 (ii), this matter would need to be determined by the Planning Committee. In preparation for this determination Members of the Planning Committee could choose to undertake a site visit prior to the provisional TPO being presented for consideration at the next Planning Committee meeting.

Members sought clarity regarding the basis of the objection. The HEM indicated that the objection related to safe vehicular ingress to and exit from the property.

Members saw little or no benefit to a site visit and therefore the costs associated with a visit were not justifiable. Members believed that photographs of the site, a diagram of the site (including measurements) in conjunction with the report would be sufficient to determine the TPO.

Tim Jickells proposed, seconded by Stephen Bolt, and

It was resolved unanimously to not undertake a site visit before the provisional TPO BA/2023/0020/TPO was considered at the next Planning Committee meeting.

BA/2023/0022/TPO - An area of woodland on the northern bank of the river Waveney, south of Dunburgh

The HEM presented a location map, a site map and a couple of photographs of the woodland associated with provisional TPO BA/2023/0022/TPO that included an area of woodland comprising mainly willow, ash and alder on the northern bank of the river Waveney, south of Dunburgh. This provisional Woodland TPO had been served in response to the recently approved planning application BA/2023/0290/FUL for the installation of angling platforms on the river Waveney, south of Dunburgh, in relation to the work associated with the application and the ongoing use of the site thereafter by the applicant, Bungay Cherry Tree Angling Club (BCTAC). The provisional TPO covered trees of mixed ages, ranging from young to veteran trees and the woodland formed an impressive riparian linear feature in the landscape. The provisional TPO would need to be confirmed before 29 March 2024.

The HEM explained that a number of objections had been received during the consultation period. The applicant, BCTAC, had raised an objection stating that:

- The club had no intention of starting work until planning permission had been granted.

- The number of platforms had been reduced to 18 (from the 25 stated on a previous withdrawn application).
- Having detailed tree locations in the Ecology report submitted with application BA/2023/0290/FUL the club were not aware that further information regarding tree works was required.
- The club queried why the TPO covered the whole woodland rather than discrete large and/or mature trees.
- The club would have preferred to have been informed of on-site meetings with other interested parties so that they could have attended.

An objection had been received from one of the site's landowners stating that they had not been consulted prior to the serving of the provisional TPO. The landowner added that a number of trees were in a poor state of growth or were growing at an angle that could cause them to fall. They believed that the location of the willow trees, between the river and the floodbank, meant that their root systems were shallow at best and there was an increased likelihood of them falling during high winds.

Both objectors had offered to withdraw their objections, subject to the Authority agreeing to let the provisional TPO lapse on 29 March 2024. As both objections were valid, having been received within the 28-day consultation period (and had not been withdrawn) and a decision needed to be reached on the TPO before the provisional TPO lapsed, then there was no mechanism to consider this offer. The HEM explained, that in accordance with the scheme of delegation the provisional TPO would need to be determined by the Planning Committee.

In preparation for this determination, Members of the Planning Committee could choose to undertake a site visit prior to the provisional TPO being presented for consideration at the next Planning Committee meeting.

A Member asked whether the TPO would include new saplings within the site. The HEM explained that it was usual for trees to reach a certain size (minimum girth of 75mm and minimum height of 1m) before they would be protected by a TPO. [Please note: Government guidance actually states that woodland orders protect the trees and saplings of whatever size within the identified area.]

In response to a question the HEM confirmed that the use of a Woodland TPO was a practical measure given the extent of the site and the number of trees within it.

Members believed the objections were of a procedural nature and therefore they could see no value to a site visit on this occasion as the relevant factors could be adequately illustrated by way of a presentation.

Bill Dickson proposed, seconded by Martyn Hooton, and

It was resolved unanimously to not undertake a site visit before the provisional TPO BA/2023/0022/TPO was considered at the next Planning Committee meeting.

The Head of Planning (HoP) explained that the recent increase in TPO reports had provided an opportunity to review the TPO process and, in particular, the recent decisions taken for site visits for TPOs. Given the Authority's ongoing review of its TPO portfolio, the HoP believed it was prudent to revise the TPO process to reflect this new knowledge. Having discussed this matter with the Chair and Vice-Chair of the Planning Committee, the HoP confirmed it had been agreed to include an officer recommendation in future TPO site visit reports indicating whether or not officers considered it necessary for the Committee to undertake a site visit, or whether the relevant factors could be illustrated by a presentation. These recommendations would be predicated on similar grounds to those for other site visits (as per Appendix 3 of the [Code of Practice for members of the Planning Committee and officers \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk)). Members were supportive of this change and asked that these reports ensured that the reasoning behind a given recommendation was clearly stated.

10. Trowse with Newton Neighbourhood Plan – agreeing to consult update

The Planning Policy Officer (PPO) introduced the report, which sought endorsement of the updated regulation 16 version of the Trowse with Newton Neighbourhood Plan. The PPO explained that since Members had endorsed the Trowse with Newton Neighbourhood Plan Regulation 16 version for consultation in August 2023 it had been updated to accommodate feedback from South Norfolk Council. These changes had been detailed in section 2 of the report.

Tim Jickells proposed, seconded by Martyn Hooton, and

It was resolved unanimously to endorse the updated version of the Trowse with Newton Neighbourhood Plan Regulation 16 version for consultation.

11. Consultation responses

The Planning Policy Officer (PPO) introduced the report, which documented the response to two Supplementary Planning Documents (SPDs) produced by East Suffolk Council. The PPO provided an overview of the proposed responses:

Draft Healthy Environments SPD

The PPO explained that the Authority would need to endorse the final Healthy Environments SPD as it included standards for open space and play and that the Authority deferred to/had regard to the open space policies of our districts.

The PPO indicated the proposed response comments related to light pollution, water stress and all types of alternative forms of transport.

Draft Rural Development SPD

The PPO indicated that the comments regarding the Rural Development SPD mainly related to the omission of references to the Broads.

Tim Jickells proposed, seconded by Martyn Hooton, and

It was resolved unanimously to endorse the nature of the proposed responses.

12. Local Plan - Preferred Options (bitesize pieces)

The Planning Policy Officer (PPO) presented the report which detailed seven new or amended policy areas that were proposed to form part of the Preferred Options version of the Local Plan. The PPO proposed to discuss each section of the report in turn and welcomed members' feedback.

Flood risk section

The PPO explained that much of the Flood Risk guidance had previously been covered within a Supplementary Planning Document (SPD). Given Government proposals to replace SPDs with Supplementary Plans, which were akin to the Local Plan, the PPO thought it expedient to transfer the SPD content into equivalent sections of Local Plan Policy.

The PPO had attempted to engage the Environment Agency (EA) in a review of this updated Local Plan Policy content, however she had desisted with this review when the EA indicated that they would charge the Authority for this activity. The PPO indicated that the EA had not previously requested a charge for this type of ad-hoc review. She reminded Members that the EA were a statutory consultee of the Local Plan and therefore their expertise would be sought during the Local Plan Preferred Options consultation. A Member expressed their disappointment about the EA's charge for a review of this content especially given the importance of this content to the Broads Authority and the EA.

The PPO indicated that the Strategic Flood Risk (SP2) policy had been updated to strengthen its reasoned justification.

Policy DM5 (Development and flood risk) had been updated to include content from the Flood Risk SPD. For example, the Local Flood Risk Assessment tick sheet was now an appendix and the Sequential Test requirements would also be included in this policy/supporting text (as per line 134 of Appendix 1 of the report). Appendices had been added to capture the Flood Response Plan guidance and Checklist previously associated with the Flood Risk SPD.

A Member asked, in relation to the predicted flood level rises as stated at line 366 of Appendix 1 of the report, whether a timescale for the predicted increase could be included.

Policy DM6 (Surface water run-off) had been updated to include an appendix detailing the relevant principles to follow when designing a Sustainable drainage systems (SuDS) scheme.

A Member asked whether the Authority could influence the need for SuDS in developments within the neighbouring districts to the Broads Executive Area. The PPO believed that the requirement for SuDS might be strengthened or even mandated nationally in future but was unsure of the detail and she would clarify this matter via an email to Members. In the meantime, the Authority would provide feedback in this regard to the neighbouring Local Planning Authorities via consultation responses and she believed the EA and Lead Local Flood Authority, as statutory consultees, would also encourage the adoption of SuDS when and where appropriate.

A Member asked whether surface water run-off was a consideration for Nutrient Neutrality (NN). The PPO could not recall how surface water run-off was factored into the assessment of NN and would investigate this matter further.

Members supported the transfer of the Flood Risk SPD content to the Local Plan.

Brundall policies – BRU1 and BRU2

Policy BRU1 (Riverside chalets and mooring plots) had been updated to include references to the Design Guide, biodiversity enhancements, dark skies, climate change adaptation and resilience, flood risk resilience and energy and water efficiency.

Policy BRU2 (Riverside Estate Boatyards, etc., including land adjacent to railway line) had been updated to reflect a possible regeneration of a site contained within and included references to a master plan for substantial developments and to promote considerations for slipways and public access.

Potter Heigham Bridge area

Policy POT1 (Bridge Area) had been updated to include considerations for surface water and fluvial flooding, biodiversity enhancements and, in light of its closure to vehicular traffic in 2023, encourage a review of the bridge's role in traffic management.

Dark skies topic paper

The PPO indicated that the Dark skies topic paper incorporated sample survey data performed since the whole of the Broads had originally been surveyed between October 2015 and March 2016. These sample surveys had been performed in 2021 and 2023 and the more recent readings were found to be consistent with the 2015/16 results and confirmed that the Broads still had intrinsically dark skies. The paper also included an updated map to correct a mistake made relating to the classification of an area near Great Yarmouth.

Light pollution policy

The PPO indicated that policy DM22 (Light pollution and dark skies) had been reviewed by the UK Dark Skies Group and changes to this policy reflected their feedback as well as lessons learnt from other areas and improvements to strengthen this policy to better protect the dark skies of the Broads.

Agricultural development

The PPO and the Senior Planning Officer had reviewed the comments received during the Issues and Options consultation on the need for a dedicated policy for agricultural development. They had concluded that the Authority's existing general topic-based policies were adequate to cover proposals for agricultural development.

A Member noted that one of the comments received during the consultation referred to water reservoirs and, in light of the recent permission granted for a water reservoir at Ludham and ongoing changes to water abstraction licences, wondered whether this form of development warranted a dedicated policy. The PPO agreed that this type of development warranted further investigation and once she had a better understanding of what these

developments entailed, she could evaluate whether there was a need for a dedicated water reservoir policy.

Energy efficiency of the existing housing stock

The PPO had reviewed the comments received during the Issues and Options consultation relating to energy efficiency of the existing housing stock. It was clear, given the scale of existing housing stock in comparison to the number of new houses being built in the Broads, that this was an important consideration and the comments received were generally supportive of this position. However, the PPO was unsure whether the Local Plan was best suited to address the energy efficiency of the existing housing stock and there were no clear exemplars to follow in this regard. In the absence of national and local approaches the PPO proposed to encourage energy efficiency in existing dwellings using existing Local Plan policies where appropriate.

Members welcomed the stance taken on energy efficiency of the existing housing stock in the absence of national guidance.

Members' comments were noted.

13. Appeals to the Secretary of State

The Committee received a schedule of appeals to the Secretary of State since the last meeting.

14. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 27 November 2023 to 15 December 2023 and there were no Tree Preservation Orders confirmed within this period.

15. Date of next meeting

The next meeting of the Planning Committee would be on Friday 02 February 2024 10.00am at King's Centre, 63-75 King Street, Norwich, NR1 1PH.

The meeting ended at 11:12am.

Signed by

Chair

Planning Committee

02 February 2024

Agenda item 8

Enforcement- Holly Lodge, Coltishall- replacement windows in Listed Building

Report by Head of Planning

Summary

UPVc replacement windows have been installed in a listed building without listed building consent. The development is contrary to planning policy and permission could not be granted.

Recommendation

To serve a Listed Building Enforcement Notice.

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1. Site location and description

- 1.1. Holly Lodge is a large, detached dwelling situated off Church Loke in Coltishall, within the Coltishall Conservation Area. It sits in a plot of around 4 hectares, mainly laid to grass with trees and is well screened by tree belts, hedges and walls. To the south of the site sits the river Bure and a residential property, Mead Side, and there is further private land to the east and the church of St John the Baptist is to the north. The western boundary is formed by Church Loke, a private road which gives access to the Norfolk Mead Hotel, Mead Side and Holly Lodge.
- 1.2. Holly Lodge is comprised of the original dwelling, a substantial linked building to the east which was built on the site of a former swimming pool, further outbuildings to the east and a number of ancillary buildings elsewhere within the plot.

1.3. In January 1952 it was listed Grade II. The list description is as follows:

House, C18, altered and extended in C20. Colourwashed brick and render with black pantiled roof. 2 storeys, with north wing and C20 cross wing to west, flat roofed extensions to north, and large pyramidal roofed extension to east. Original facade to south, 3 windows, with central door flanked by canted bays. Central, part glazed entrance door and doorcase with panelled pilasters and consoles supporting projecting cornice. Sash windows with glazing bars. Brick dentil eaves and axial stacks. 3 roof lights. C20. extensions not of special Interest.

2. The unauthorised development

- 2.1. As a member of the National Park family the Broads Authority is required to visit all listed buildings within its area every five years¹. The purpose of this Quinquennial Survey (QQ) is to monitor the condition of the listed assets and protect against unauthorised change. In 2021 the QQ visual inspection of Holly Lodge found that, with the exception of one window, all of the windows in the original dwelling had been replaced with white PVC units, along with a few other changes including lead canopies installed over the ground floor windows and faux shutters at the first floor. The owner of the property was contacted in 2022 and there have subsequently been meetings and correspondence about the works that have taken place. The discussions have been primarily about the windows.
- 2.2. The windows that have been installed in the property are modern double-glazed UPVC units in white. They are a mix of styles, depending on the opening, and include imitation sashes, bow windows and some semi-circular windows on the flank elevation. On the principal elevation there are full length bay windows in the central section, a full length French window on the western end and a wide, shallow window on the first floor at the eastern end. There are also a number of UPVC doors, with glazed panels, on the principal and rear elevations.
- 2.3. From the discussions with the owner, it is clear that the windows were replaced over 20 years ago. The owner advises that he bought the property in 1976 and was not told that it was listed, so did not know listed building consent was required to replace the windows. The sales particulars, which officers have seen, do not mention the listing, however it is clear in the Land Registry entry that the property is Grade 2 listed. The owner has said that prior to installing the windows, in 1991, he visited the offices of the Broads Authority and was told he didn't need permission; he was given a leaflet about Building Regulations. There is no record of this enquiry, but this is not uncommon for the time. The windows were installed some time after this.
- 2.4. The planning history shows that in 1978 and 1979 planning permissions were granted for, respectively, an extension and an enclosure to house a swimming pool which had

¹ As part of the annual Historic Environment Joint Statement Objective Delivery assessment.

previously been constructed. These are listed on Broadland District Council's website, but there are no documents, so it is not possible to ascertain whether or not the listed status was referred to.

- 2.5. In 1993 and 1994 planning applications were made for an agricultural building; neither was granted and an appeal was dismissed in 1995 in respect of the latter. In the appeal decision, the Inspector makes reference to the listed status of Holly Lodge.
- 2.6. The planning history indicates that the property was visited by officers of the LPA on a number of occasions after 1991, but there are no records to indicate whether or not the windows had been replaced at this time.
- 2.7. It must be noted that Holly Lodge should have been visited every five years under the QQ programme, totalling six inspections between 1989 and 2019. This would have been undertaken by Broadland District Council (as the constituent District Council) prior to the Broads Authority taking the planning service in-house in April 2007. In a report to Planning Committee in November 2009, Members were advised that, following the planning service coming in-house, a survey of all the protected structures in the Broads area had been undertaken. The report stated the survey had shown that some listed buildings had been subject to unauthorised works and this would need to be addressed. Holly Lodge is identified on the schedule as a listed building, but the undated file notes record that it had not been surveyed.
- 2.8. Members will be aware that development without planning permission will become immune from enforcement action after four years for operational development and ten years for a material change of use². This provision does not apply to Listed Buildings and immunity cannot be acquired.

3. The planning issues

- 3.1. The Broads Authority has a Local Enforcement Plan which sets out its approach to dealing with enforcement matters. It was reviewed and updated in July 2022. At paragraph 3.7 it states that "Whilst the law gives a Local Planning Authority strong legal powers to deal with breaches of planning control, in most cases the first choice of approach is to use negotiation to reach a satisfactory resolution in a timely manner. The negotiations would aim to achieve one of the following outcomes:
 - To apply for retrospective planning permission if the development is acceptable and would have got planning permission in the first place; or
 - To amend the development so it is acceptable and then apply for retrospective planning permission if the development is capable of being acceptable; or

² Note – this is due to change to ten years for both, under provisions of the Levelling Up and Regeneration Act

- To amend the development so it is in accordance with the approved plans if the amendments are acceptable; or
 - To remove the unauthorised development or cease the unauthorised use if the development is unacceptable and incapable of being made acceptable.”
- 3.2. In determining how to take this matter forward, the LPA must consider whether the unauthorised development is acceptable or capable of being made acceptable in planning terms.

The acceptability of the development

- 3.3. Adopted Local Plan policy DM11 (Heritage Assets) requires that “All development will be expected to protect, preserve, or enhance the significance and setting of historic, cultural and architectural heritage assets ...”, going on to state “Development that would affect a Designated Heritage Asset or its setting will be considered in the context of national policy, having regard to the significance of the asset.”
- 3.4. A listed building is a Designated Heritage Asset, so it is necessary to assess the effect of the works against the policies in the NPPF (2023). NPPF Paragraph 205 states:
- “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.
- 3.5. In stating that great weight should be given to the conservation of the asset irrespective of the extent of the harm, para 205 has the effect of creating a presumption in favour of protecting the designated asset against any development which would harm its significance.
- 3.6. NPPF Paragraph 206 states:
- “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration, or destruction, or from development within its setting) should require clear and convincing justification. Substantial harm to or loss of: (a) grade II listed buildings ... should be exceptional ...”.
- 3.7. This reinforces the protection accorded to the significance of a designated heritage asset, as set out in para 205, but allows for a justification to be provided for consideration. In stating that substantial harm to or loss of a Grade II listed building should be exceptional, it indicates that the bar is set high for the justification.
- 3.8. In considering the acceptability of the development, the LPA must first assess the level of harm resulting from the unauthorised development, which in this case arises from the impact on the listed building. It is acknowledged that the windows were replaced many years ago, however there is no immunity from enforcement action for listed buildings so this is not a planning consideration here.

- 3.9. The significance of Holly Lodge is primarily considered to lie in its evidential value, its historical value and its aesthetic value. The building is a good example of a relatively large 18th century house and retains many of the features of such a building. It contributes to the story of the development of Coltishall village and its brewery trade, in particular through its links with the 18th century diarist Mary Hardy, who lived in the house. Aesthetically, the building has some value and is an attractive house, built from vernacular materials and it enjoys a positive relationship to its surroundings which contributes to its aesthetic value.
- 3.10. Considering then the harm arising from the works, the removal of the historic timber windows has resulted in a degree of harm to all of the above values, which together make up its significance. The fabric of the historic windows that would have yielded information about the past, has now been lost. The design of the details of the windows and the glass within them could have told us much about the story of the house and wider area. Aesthetically, the design, detailing and operation of modern UPVc windows makes them look very different to traditional windows, and the frames, glazing bars and overlap of the sashes is also very different, as is the potential loss of the reflective quality of historic glass, all of which gives modern windows a much flatter and uniform appearance which reduces the aesthetic value of the building.
- 3.11. Historic England guidance states that, ‘Windows are the eyes of a building – they let in light and give views out – and profoundly affect its appearance. In addition, traditional windows bear witness to the artistic, social, economic and technological developments of past ages.’ Given the contribution that the windows make to the overall significance of the building it is considered that the alterations to Holly Lodge have caused substantial harm.
- 3.12. In this case, having established that the windows are integral to the significance of the designated heritage asset, it also follows that any justification for their replacement with something different must be exceptional. In this case, of course, the windows have already been replaced and so the argument is around whether or not the replacements can or cannot be retained.
- 3.13. As a general principle, it is the case that the installation of UPVc windows (and doors) in a listed building is rarely acceptable. This is because the manufacturing process does not adequately replicate the profile of traditional joinery, with the result that the units have a bulky appearance which is detrimental to the appearance and character of most traditional buildings. The impact is often exacerbated by the uniform plane of the glazed element, which lacks the relief created by traditional glazing bars and the overlap where the individual sashes or casements meet. It is acknowledged that UPVc products do vary, however even the better ones are rarely appropriate in a listed building. In this case, whilst it is acknowledged the replacement windows are of good quality, they do not replicate the fine detailing of traditional joinery and glazing and cause substantial harm to the appearance, character and significance of the dwelling. The works are therefore contrary to para 206, 207 as well as DM11.

- 3.14. In this case, the installation of modern UPVc windows has resulted in the loss of historic fabric, changed the appearance and character of the property and impacted adversely on its significance. The works are therefore contrary to DM11, in that the works have neither protected, preserved or enhanced the significance of the property.
- 3.15. It is concluded that the development is not acceptable and nor can it be made acceptable. The LPA must consider the expediency of enforcement action.

The expediency of enforcement action

- 3.16. When a breach of planning control has taken place and the LPA is considering what action is appropriate, it will need to look carefully at a number of factors. The factors are expediency, proportionality and consistency.

Expediency

- 3.17. Expediency may be explained as an assessment of the harm that is being caused by the breach. Harm may arise through a range or combination of factors, for example adverse impact on visual amenity due to poor design or materials, and this would be an example of direct harm arising from the unlawful development. There is also the generic harm which arises from a development which is in conflict with adopted policies and which, if it were not addressed, would undermine the policies in the development plan as well as the principles of the NPPF and NPPG. Furthermore, paragraph 59 of the NPPF states “Effective enforcement is important to maintain public confidence in the planning system”, demonstrating that this is a valid objective in itself.
- 3.18. In this case, given that substantial harm has been caused to the significance of the listed building, it is not possible to conclude that it is not expedient to seek to remedy the situation.

Proportionality

- 3.19. The second test is one of proportionality; enforcement action should always be proportionate to the seriousness of the harm being caused. In considering proportionality, it is also necessary in the interests of fairness to ask the question of whether or not action is justified given that the windows have been in situ for many years, so the harm to the designated heritage asset has already occurred, and there will be significant impacts on the owner of the building if he is required to remove and replace them.
- 3.20. In this case, substantial harm has been caused to the listed building with its character and appearance, as well as its significance, having been substantially eroded by the complete removal and replacement of all (but one) of the windows at the property.
- 3.21. The delay in discovering the breach is certainly very regrettable, and there is no explanation of why the replacement windows were not found earlier. Whilst the property is in a remote location, which is not casually passed, and is well screened by boundary treatments, there are nonetheless views from Church Loke of the semi-circular windows on the flank wall and a number on the rear elevation and it is clear that these are UPVc. As detailed at 2.6 and 2.7 above, there must also have been a

number of site visits by officers in connection with previous planning applications and inspections. However, as detailed above, there is no immunity period for a listed building, so, in legal and planning terms, the delay is not a factor here and the LPA has to proceed on the basis of its statutory obligations and seek to protect the designated heritage asset, which means requiring the replacement of the windows.

- 3.22. The impact on the owner will be significant in cost and inconvenience, and this is recognised. The LPA could mitigate this by allowing a long period for compliance and this will be considered. Subject to this, it is considered that enforcement action is not disproportionate.

Consistency

- 3.23. The third test is consistency and the Local Enforcement Plan identifies the need to ensure consistency so that a similar approach is taken in similar circumstances to achieve similar outcomes.
- 3.24. The need for listed building enforcement action, fortunately, is not a situation which often arises, however there is a precedent. This was a similar situation where replacement UPVc windows had been installed in a listed building in Oby without the required consent. This came to light as part of the 2008/2009 survey of listed buildings and it transpired that the windows had been installed around 12 years previously. A [report \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk) was brought to the Planning Committee in August 2012 and [authorisation \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk) was granted to serve a Listed Building Enforcement Notice if voluntary compliance could not be achieved. Voluntary compliance was achieved, in that an application for Listed Building Consent was submitted and approved in 2014 and the windows were replaced over an agreed period.
- 3.25. A similar approach has been taken in this current case, in that the landowner has been invited to submit a planning application to replace the UPVc windows with ones of a more suitable material and design and advised that any consent would be subject to an extended implementation timescale or a phasing scheme to mitigate the impact as far as possible. The owner has indicated that he does not wish to do this as he considers the existing windows to be acceptable. As an alternative, it has been suggested that he apply to retain the existing windows and then appeal against any refusal, but he has indicated that he does not wish to do this either. Separately, it is worth noting that he has said he would like Historic England (HE) to visit the property and consider delisting it, however HE will not consider this where there is an outstanding enforcement investigation.
- 3.26. The Local Enforcement Plan acknowledges that whilst the law gives an LPA strong legal powers to deal with unauthorised development, the preferred approach is always to seek to negotiate a solution and the fourth test considers whether this approach has been applied. In this case, it is considered that the LPA has gone as far as it can in terms of negotiation and formal action is the next step.

- 3.27. In considering expediency it is also necessary to take account of the impacts and costs of taking action, which would include the resources required to do this, as well as what is likely to be achieved. The more harm that is being caused then the more likely it is that it will be expedient to take enforcement action due to the need to stop the harm. Conversely, if there is little harm it may not be expedient to pursue the matter, particularly if the costs are high. In this case, there is significant harm to interests of public importance from development which is intrinsically unacceptable.
- 3.28. In conclusion, it is considered that the development is unacceptable, substantial harm has occurred and enforcement action can be justified as expedient.

4. Financial implications

- 4.1. The service of a Listed Building Enforcement Notice, as a first step, incurs relatively little cost. There will be officer time involved and legal advice may be needed. It is likely to be helpful to contract a heritage architect or surveyor to draw up precise specifications for the replacement windows to include in the Notice and there will be a cost associated with this. This will need to be met from the existing budget.
- 4.2. If compliance is not achieved voluntarily there will be costs associated with enforcing this. Members will be advised of progress through the regular update to Planning Committee, so there will be the opportunity to consider any additional costs.

5. Conclusion

- 5.1. The unauthorised development at the site is contrary to development plan policy and could not be granted planning permission.
- 5.2. The Local Enforcement Plan explains that where an unauthorised development is unacceptable and cannot be made acceptable, the LPA should seek to negotiate a solution. Officers have sought to find a resolution here other than through formal action, but there is no realistic prospect of this. It is recommended that a Listed Building Enforcement Notice is served requiring the removal and replacement of the existing UPVc windows. A compliance period of ten years would be appropriate.

Author: Cally Smith

Date of report: 18 January 2024

Background papers: Enforcement file, Historic Buildings and Conservation Area Review (PC 6 November 2009)

Appendix 1 – Location map

Appendix 1 – Location map

Holly Lodge, Church Loke, Coltishall



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Planning Committee

02 February 2024

Agenda item number 9

Enforcement update

Report by Head of Planning

Summary

This table shows the monthly updates on enforcement matters. The financial implications of pursuing individual cases are reported on a site by site basis.

Recommendation

To note the report.

Committee date	Location	Infringement	Action taken and current situation
14 September 2018	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravans (Units X and Y)	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the removal of unauthorised static caravans on land at the Beauchamp Arms Public House should there be a breach of planning control and it be necessary, reasonable and expedient to do so. • Site being monitored. October 2018 to February 2019. • Planning Contravention Notices served 1 March 2019. • Site being monitored 14 August 2019. • Further caravan on-site 16 September 2019.

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> • Site being monitored 3 July 2020. • Complaints received. Site to be visited on 29 October 2020. • Three static caravans located to rear of site appear to be in or in preparation for residential use. External works requiring planning permission (no application received) underway. Planning Contravention Notices served 13 November 2020. • Incomplete response to PCN received on 10 December. Landowner to be given additional response period. • Authority given to commence prosecution proceedings 5 February 2021. • Solicitor instructed 17 February 2021. • Hearing date in Norwich Magistrates Court 12 May 2021. • Summons issued 29 April 2021. • Adjournment requested by landowner on 4 May and refused by Court on 11 May. • Adjournment granted at Hearing on 12 May. • Revised Hearing date of 9 June 2021. • Operator pleaded 'not guilty' at Hearing on 9 June. Trial scheduled for 20 September at Great Yarmouth Magistrates Court. • Legal advice received in respect of new information. Prosecution withdrawn and new PCNs served on 7 September 2021. • Further information requested following scant PCN response and confirmation subsequently received that caravans 1 and 3 occupied on Assured Shorthold Tenancies. 27 October 2021 • Verbal update to be provided on 3 December 2021

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> • Enforcement Notices served 30 November, with date of effect of 29 December 2021. Compliance period of 3 months for cessation of unauthorised residential use and 4 months to clear the site. 6 Dec. 2021 • Site to be visited after 29 March to check compliance. 23 March 2022 • Site visited 4 April and caravans appear to be occupied. Further PCNs served on 8 April to obtain clarification. There is a further caravan on site. 11 April 2022 • PCN returned 12 May 2022 with confirmation that caravans 1 and 3 still occupied. Additional caravan not occupied. • Recommendation that LPA commence prosecution for failure to comply with Enforcement Notice. 27 May 2022 • Solicitor instructed to commence prosecution. 31 May 2022 • Prosecution in preparation. 12 July 2022 • Further caravan, previously empty, now occupied. See separate report on agenda. 24 November 2022 • Planning Contravention Notice to clarify occupation served 25 November 2022. 20 January 2023. • Interviews under caution conducted 21 December 2022. 20 January 2023 • Summons submitted to Court. 4 April 2023 • Listed for hearing on 9 August 2023 at 12pm at Norwich Magistrates' Court. 17 May 2023 • Operator pleaded 'not guilty' at hearing on 9 August and elected for trial at Crown Court. Listed for hearing on 6 September 2023 at Norwich Crown Court. 9 August 2023.

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> • Hearing at Norwich Crown Court adjourned to 22 September 2023. 1 September 2023. • Hearing at Norwich Crown Court adjourned to 22 December 2023. 26 September 2023. • Hearing postponed at request of Court. Rescheduled to 15 March 2024 (16 January 2024).
8 November 2019	Blackgate Farm, High Mill Road, Cobholm	Unauthorised operational development – surfacing of site, installation of services and standing and use of 5 static caravan units for residential use for purposes of a private travellers’ site.	<ul style="list-style-type: none"> • Delegated Authority to Head of Planning to serve an Enforcement Notice, following liaison with the landowner at Blackgate Farm, to explain the situation and action. • Correspondence with solicitor on behalf of landowner 20 Nov. 2019. • Correspondence with planning agent 3 December 2019. • Enforcement Notice served 16 December 2019, taking effect on 27 January 2020 and compliance dates from 27 July 2020. • Appeal against Enforcement Notice submitted 26 January 2020 with a request for a Hearing. Awaiting start date for the appeal. 3 July 2020. • Appeal start date 17 August 2020. • Hearing scheduled 9 February 2021. • Hearing cancelled. Rescheduled to 20 July 2021. • Hearing completed 20 July and Inspector’s decision awaited. • Appeal dismissed with minor variations to Enforcement Notice. Deadline for cessation of caravan use of 12 February 2022 and 12 August 2022 for non-traveller and traveller units respectively, plus 12 October 2022 to clear site of units and hardstanding. 12 Aug 21 • Retrospective application submitted on 6 December 2021.

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> • Application turned away. 16 December 2021 • Site visited 7 March 2022. Of non-traveller caravans, 2 have been removed off site, and occupancy status unclear of 3 remaining so investigations underway. • Further retrospective application submitted and turned away. 17 March 2022 • Further information on occupation requested. 11 April 2022 • No further information received. 13 May 2022 • Site to be checked. 6 June 2022 • Site visited and 2 caravans occupied in breach of Enforcement Notice, with another 2 to be vacated by 12 August 2022. Useful discussions held with new solicitor for landowner. 12 July 2022. • Further site visited required to confirm situation. 7 September 2022 • Site visit 20 September confirmed 5 caravans still present. Landowner subsequently offered to remove 3 by end October and remaining 2 by end April 2023. 3 October 2023. • Offer provisionally accepted on 17 October. Site to be checked after 1 November 2022. • Compliance with terms of offer as four caravans removed (site visits 10 and 23 November). Site to be checked after 31 March 2023. 24 November 2022 • One caravan remaining. Written to landowner’s agent. 17 April 2023 • Gypsy and Traveller Accommodation Needs Assessment commissioned. June 2023
13 May 2022	Land at the Beauchamp Arms	Unauthorised operation	<ul style="list-style-type: none"> • Authority given by Chair and Vice Chair for service of Temporary Stop Notice requiring cessation of construction 13 May 2022

Committee date	Location	Infringement	Action taken and current situation
	Public House, Ferry Road, Carleton St Peter	development comprising erection of workshop, kerbing and lighting	<ul style="list-style-type: none"> • Temporary Stop Notice served 13 May 2022. • Enforcement Notice and Stop Notice regarding workshop served 1 June 2022 • Enforcement Notice regarding kerbing and lighting served 1 June 2022 • Appeals submitted against both Enforcement Notices. 12 July 2022
21 September 2022	Land at Loddon Marina, Bridge Street, Loddon	Unauthorised static caravans	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravans. • Enforcement Notice served. 4 October 2022. • Enforcement Notice withdrawn on 19 October due to minor error; corrected Enforcement Notice re-served 20 October 2022. • Appeals submitted against Enforcement Notice. 24 November 2022
9 December 2022	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravan (Unit Z)	<ul style="list-style-type: none"> • Planning Contravention Notice to clarify occupation served 25 Nov 2022. • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravan • Enforcement Notice served 11 January 2023. 20 January 2023. • Appeal submitted against Enforcement Notice. 16 February 2023.
31 March 2023	Land at the Berney Arms, Reedham	Unauthorised residential use of caravans and outbuilding	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of the caravans • Enforcement Notice served 12 April 2023 • Enforcement Notice withdrawn on 26 April 2023 due to error in service. Enforcement Notice re-served 26 April 2023. 12 May 2023 • Appeal submitted against Enforcement Notice. 25 May 2023

Author: Cally Smith

Date of report: 16 January 2024

Background papers: Enforcement files

Planning Committee

02 February 2024

Agenda item number 10

BA/2023/0022/TPO - Geldeston- An area of woodland on the northern bank of the river Waveney, south of Dunburgh

Report by Historic Environment Manager

Summary

A Provisional Tree Preservation Order (TPO) has been served on an area of woodland on the northern bank of the river Waveney to the south of Dunburgh, near Geldeston.

Objections to the TPO have been received. Members to consider whether to confirm the TPO.

Recommendation

It is recommended that the TPO is confirmed.

1. Background

- 1.1. As part of its obligation as a Local Planning Authority (LPA), the Broads Authority is required to serve Tree Preservation Orders (TPOs) on trees which are considered to be of amenity value and which are under threat. There are criteria set out in The Town and Country (Tree Preservation) (England) Regulations) 2012 against which a tree must be assessed in order to determine whether it meets the threshold for protection.
- 1.2. This report explains how this process has been carried out in respect of a woodland TPO on the northern bank of the river Waveney to the south of Dunburgh at Geldeston (BA/2023/0022/TPO).

2. Tree Preservation Order procedure

- 2.1. There are two prerequisites which must be met for a tree to be considered for protection through a TPO. Firstly, the tree must be of amenity value, and secondly it must be under threat. There are many trees in the Broads (and elsewhere) which are of sufficient amenity value to qualify for TPO status, but which are not protected as they are not under threat. The TPO process is not a designation like, for example, a Conservation Area which is made following an assessment of particular character, but is effectively a response to a set of circumstances.

- 2.2. Typically, the consideration of a tree for a TPO designation will arise in connection with either a Section 211 notification, notifying the Authority of proposed works to trees within a Conservation Area, or a development proposal either through a formal planning application or a pre-planning application discussion. At a site visit or when looking at photos or other visual representation, a case officer may see there is a tree on the site which is potentially of amenity value and under threat from the proposed development. The case officer will consult the Authority's Arboricultural Consultant, who may need to investigate further and will visit the site and make an assessment of the tree under the 2012 Regulations. If the tree is considered to meet the criteria in the Regulations then a provisional TPO will be served.
- 2.3. After a provisional TPO has been served there is a consultation period, which gives the opportunity for the landowner and other interested parties to comment on it.
- 2.4. The Regulations require that a provisional TPO must be formally confirmed by the LPA within 6 months of it being served; if it is not confirmed then it will lapse automatically.
- 2.5. The Authority's scheme of delegation allows provisional TPOs to be served and for non-controversial TPOs (i.e. where no objections have been received) to be confirmed by officers under delegated powers.
- 2.6. Where an objection has been received, the provisional TPOs is brought before the Planning Committee for a decision on whether or not to confirm it. Members will decide whether to undertake a site visit to view the tree/s prior to making the decision on the confirmation.

3. The potential Tree Preservation Order on the northern bank of the river Waveney to the south of Dunburgh

- 3.1. The site is located to the south of Dunburgh and consists of a tree belt running along the northern bank of the river Waveney. The width of the tree belt varies along its length and is between approximately 12m and 28m in width and is approximately 670m in length.
- 3.2. The trees are primarily ash, willow and alder. They are of mixed ages, ranging from young to veteran trees and the woodland forms an impressive riparian linear feature in the landscape.
- 3.3. The provisional TPO was originally served due to a perceived threat to the trees from planning application BA/2023/0290/FUL which proposed wooden angling platforms within the proximity of trees. Although the planning application has now been approved, it is considered that the ongoing use of the site by an angling club results in an increased level of threat, such that a TPO can be justified.
- 3.4. On 29 September 2023 a provisional TPO was served on the trees. Given the number of trees and their group value, a Woodland TPO was considered appropriate.

- 3.5. Woodland Orders protect both the trees and saplings, whatever their size, within the TPO area, including those that are planted or grow naturally after the TPO is made. This is because the purpose of the order is to safeguard the woodland as a whole, which depends on regenerating or new planting.
- 3.6. A number of objections have been raised to the provisional TPO.
- 3.7. The Bungay Cherry Tree Angling Club (BCTAC) object on the following grounds (please note that these objections make reference to planning application BA/2023/0290/FUL and were submitted to the Authority prior to the planning application's approval):
- The club had no intention of starting work until planning permission was granted;
 - Changes to the planning application were made following the withdrawal of an earlier planning application. The new application reduces the number of platforms and moves them further away from the trees;
 - The club were not aware that further information was required regarding the trees and the potential impacts on them. The position of the trees were detailed in the Ecology report;
 - The BCTAC consider it strange that the TPO covers the whole stretch of woodland (including large areas of alder and willow that have recently been cut back) rather than individual large / mature trees;
 - It would have been useful for BCTAC to have been informed about site meetings with other interested parties so that they could attend.
- 3.8. Another objection was raised by one of the landowners. The objection was:
- There was lack of consultation with the owner of the land;
 - A number of trees are in a poor state of growth or are growing at an angle that could cause them to fall. The nature of the willow growing between the top of the footpath and the river edge means that their root system is at best very shallow making for frequent collapses of those trees in a high wind.
 - Who is responsible for these trees? Concern raised regarding being able to manage the trees if a TPO were served and liability.
- 3.9. Both objectors have offered to withdraw their objections if the Authority agrees to let the TPO lapse once the works approved under application no: BA/2023/0290/FUL have been completed. There is no mechanism to do this and so the decision is whether or not to confirm the provisional TPO.
- 3.10. It should be noted that 4 letters in support of the provisional TPO were also received. The following points summarise the main comments made:

- Many local residents are concerned about the threat to the rare wet woodland and hope this will be made a permanent protection and will also include the whole woodland rather than just the trees.
- Concern regarding the impact on the environment from an increase in human disturbance
- The stretch of the river bank is home to many species including, willow warbler, cuckoo, water vole, cormorant, owl, marsh harrier, buzzard, otter and stoat, as well as insects and invertebrates. The habitat between these trees is very important for their survival.
- The multitude of willows helps to stabilise the river bank from the tidal River Waveney and help to dissipate the wind force.
- They consider the young trees and saplings to be as important as the mature trees, as the trees of tomorrow

3.11. The Tree Preservation Order will lapse if it is not confirmed by 29 March 2024.

3.12. Members decided at the Planning Committee on 05 January 2024 that it was not necessary to undertake a site visit.

4. Next steps

4.1. The provisional TPO is reported to Planning Committee for their consideration.

4.2. The Authority's Arboricultural Consultant considers that the trees detailed in this report are worthy of a TPO due to their amenity value and the contribution that they make to the landscape, as explained at 3.2 above. Objections have, however, been received from the owner of the site and the Angling Club who occupy the site and the following Statement of Case sets out those objections formally, along with the response from the Arboricultural Consultant.

No.	Representation	Response
1.	<p>1. The club had no intention of starting work until Planning Permission was granted.</p> <p>2. Changes to the planning application have been made following the withdrawal of the earlier planning application. This reduces the number of platforms and moves them further from mature trees.</p> <p>3. The club were not aware that further information was</p>	<p>The objections appear to be more in relation to the nature of the serving of the TPO rather than to the proposed protection of the trees/woodland itself. Despite the submission of the necessary documentation and subsequent approval of the planning application, there is still a need for tree works. The ongoing increased use of the site could well lead to unauthorised tree works and potential loss of vegetation. Given this it is my opinion that the risk to the trees</p>

No.	Representation	Response
	<p>required regarding the trees and potential impacts. The position of the trees is detailed in the Ecology report.</p> <p>4. It is strange that the TPO covers the whole stretch of woodland (including areas of alder / willow that have recently been cut back) rather than individual large / mature trees.</p> <p>5. It would have been useful for BCTAC to have been informed about on site meetings with other interested parties so that they could attend.</p>	<p>will be slightly increased in the long-term with the increased footfall and therefore the TPO is appropriate.</p>
2.	<p>1. Lack of consultation with owner of the land.</p> <p>2. A number of trees are in a poor state of growth or are growing at an angle that could cause them to fall. The nature of the willow growing between the top of the footpath and the river edge means that their root system is at best very shallow making for frequent collapses of those trees in a high wind</p> <p>3. Concern regarding liability should trees fail and restrictions on removing dead branches etc.</p>	<p>Again, there is concern raised about the process, but given the nature of the application and need to protect the woodland, it is considered that the manner in which the TPO was issued (which is standard practice) was both appropriate and proportionate. The objector is correct about the number of trees in poor condition and the need for management. The TPO has been placed to prevent the unnecessary loss/damage of trees by inappropriate works. It does not, and will not, prevent the good management of the trees and woodland and the Broads Authority will work with the objector/owner/manager of the site to ensure necessary works are not prevented.</p> <p>Dead and dangerous trees are exempt from the legislation and therefore can be removed without the need for applications to the Broads Authority, although records of the tree and its condition should be retained to enable the necessary parties to prove that the trees were indeed dead or dangerous.</p>

- 4.3. As detailed in the response, the objections are primarily related to the process, rather than the merits of the TPO. Officers are satisfied that the reasons for serving the TPO are sound and remain relevant.

5. Recommendation

- 5.1. It is recommended that the provisional Tree Preservation Order on the northern banks of the river Waveney at Dunburgh is confirmed.

Author: Kate Knights

Date of report: 18 January 2024

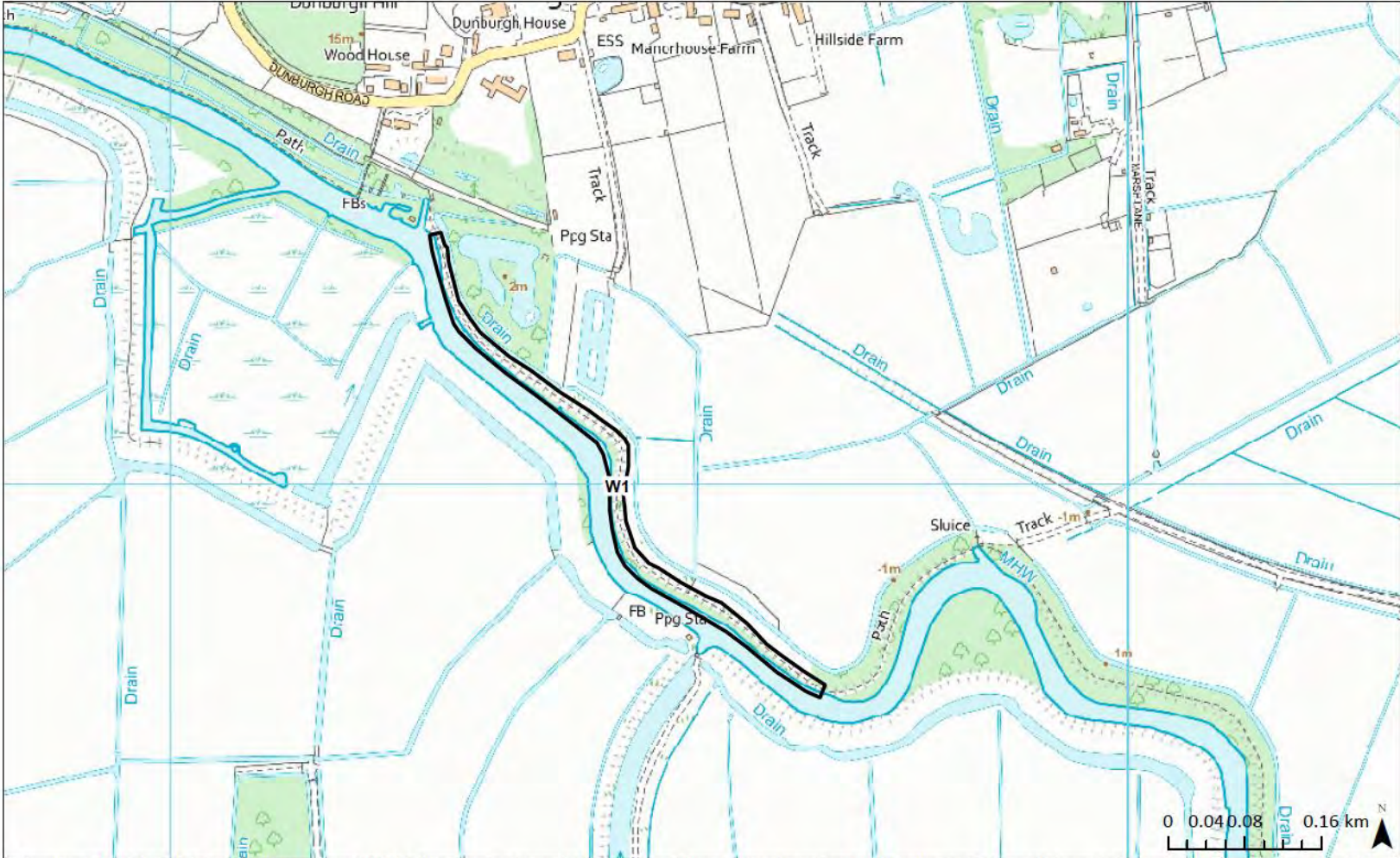
Background papers: TPO (BA/2023/0022/TPO) file

Appendix 1 – Location map

Appendix 1 – Location map

BA/2023/0022/TPO - Northern Bank Of River Waveney, South Of Dunburgh

Scale: 1:5,000



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Planning Committee

02 February 2024

Agenda item number 11

Tree Preservation Order- Proposed site visit- Crabbett's Marsh (BA/2023/0027/TPO)

Report by Historic Environment Manager

Summary

Objections have been received to a provisional Tree Preservation Order (TPO) and, as required by the Authority's Scheme of Delegation, this TPO will need to be determined by the Planning Committee. This report considers whether a site visit is required prior to the determination of the TPO.

Recommendation

That Members of the Planning Committee undertake a site visit for a provisional TPO at Crabbett's Marsh, Horning (BA/2023/0027/TPO).

1. Background

- 1.1. As part of its obligation as a Local Planning Authority (LPA), the Broads Authority is required to serve Tree Preservation Orders (TPOs) on trees which are considered to be of amenity value and which are under threat. There are criteria set out in The Town and Country (Tree Preservation) (England) Regulations) 2012 against which a tree must be assessed in order to determine whether it meets the threshold for protection.
- 1.2. This report explains how this process has been carried out in respect of a woodland area at Crabbett's Marsh, Horning (BA/2023/0027/TPO).

2. Tree Preservation Order procedure

- 2.1. There are two prerequisites which must be met for a tree to be considered for protection through a TPO. Firstly, the tree must be of amenity value, and secondly it must be under threat. There are many trees in the Broads (and elsewhere) which are of sufficient amenity value to qualify for TPO status, but which are not protected as they are not under threat. The TPO process is not a designation like, for example, a Conservation Area which is made following an assessment of particular character, but is effectively a response to a set of circumstances.
- 2.2. Typically, the consideration of a tree for a TPO designation will arise in connection with a development proposal, either through a formal planning application or a pre-Planning

application discussion. At a site visit or when looking at photos or other visual representation, a case officer will see there is a tree on the site which is potentially of amenity value and under threat from the proposed development and this will trigger the TPO process. The case officer will consult the Authority's Arboricultural Consultant and he will visit the site and make an assessment of the tree under the 2012 Regulations. If the tree is considered to meet the criteria in the Regulations, then a provisional TPO will be served.

- 2.3. After a provisional TPO has been served there is a consultation period, which gives the opportunity for the landowner and other interested parties to comment on it. The Regulations require that a provisional TPO must be formally confirmed by the LPA within 6 months of it being served; if it is not confirmed then it will lapse automatically.
- 2.4. The Authority's scheme of delegation allows provisional TPOs to be served under delegated powers and for non-controversial TPOs (i.e. where no objections have been received) to be confirmed by officers under delegated powers. Where an objection has been received as part of the consultation process, Members can decide to undertake a site visit to view the tree prior to making a decision on whether or not to confirm the TPO. Guidance on when it is appropriate to undertake a site visit is similar to that which applies in respect of a planning application. This is set out in Appendix 3 of the [Code of Practice for members of the Planning Committee and officers \(broads-authority.gov.uk\)](https://www.broadsofauthority.gov.uk). The circumstances in which this would be appropriate include:
 - where the issues are finely balanced;
 - where the impacts on neighbour amenity or the wider landscape are difficult to envisage other than by site assessment; or
 - it is beneficial in the interests of local decision-making to demonstrate that all aspects of the proposal have been considered on site.
- 2.5. The grounds of the objection will be reported to the Planning Committee in order to inform the decision on whether or not to undertake a site visit, and a recommendation will be made by officers.
- 2.6. The details of the objection will only be discussed at the meeting where a decision is to be made on whether or not to confirm the TPO.

3. Potential Tree Preservation Order at Crabbett's Marsh, Horning

Site at Crabbett's Marsh, Horning

- 3.1. The subject trees are a part of a large area of wet woodland consisting primarily of alder, willow and birch trees.
- 3.2. Crabbett's Marsh is a large area of wet woodland to the west of Horning and situated to the rear of the riverside chalets at Bureside Estate. It is accessed off Horning Road

(A1062), via South Quays Lane. South Quays Lane and Woodlands Way Road form the eastern boundary of the site, with the southern boundary being to the north of the chalets. Its western edge runs along Hoveton Little Broad. The River Bure is located to the south of the TPO'd area. An unsurfaced track runs from South Quays Lane, providing vehicular and pedestrian access to the marsh plots and chalets. The woodland has been divided into plots, many of which back on to one of the dykes, and consequently there are a number of different owners. Historically there have been no boundary treatments or demarcations to the plots, so the woodland has the appearance of a homogenous block.

- 3.3. The wet woodland is primarily made up of alder, birch and willow. It potentially has a long lifespan and the carr has high visual amenity across a wide area, for example from Hoveton Little Broad, the River Bure and Horning Road. Wet woodland is also considered a UK BAP Priority Habitat (these are the habitat types that are identified as being most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP)).
- 3.4. There is considered to be a threat to the woodland due to the incremental clearance by land owners, in particular from plot owners. Much of the clearance is well meaning, as owners seek to 'tidy' the plot or clear access to the dykes at the rear.
- 3.5. On 24 October 2023 a provisional TPO was served on the woodland. This must be confirmed by 24 April 2024.
- 3.6. The provisional TPO was served as part of the Broads Authority's TPO Review process in order to ensure that the order meets current legal requirements. There was an existing TPO that covered exactly the same area and had exactly the same restrictions. This has now been revoked with an identical provisional TPO having been served.
- 3.7. 14 representations were received from consultees. Having responded to the points raised in these representations, the Authority received two objections to the TPO. These are listed in the Statement of Case at Appendix 1.

4. Site visit consideration

- 4.1. A copy of the objections to the provisional TPO and the responses from the Authority's Arboricultural Consultant and Head of Planning to the representations received are set out in a Statement of Case, attached at Appendix 1.
- 4.2. The main issues raised by the objection(s) are set out in the Statement of Case.
- 4.3. A presentation on the TPO will be provided at the 01 March 2024 meeting of the Planning Committee with photographs of the woodland and its context, including the neighbouring properties and the local area.
- 4.4. The level of concerns expressed is acknowledged and due to the nature of the site and the issues facing it, it is considered that it would be beneficial for Members to visit the site so that they could view the issues directly.

- 4.5. If a site visit is deemed necessary then it must be held with consideration for the report deadline of 16 February 2024 associated with the Planning Committee meeting when the TPO is to be determined.
- 4.6. The report for the 01 March 2024 meeting of the Planning Committee will detail recommendations for consideration regarding the confirmation of the TPO.

5. Recommendation

- 5.1. That Members do undertake a site visit.

Author: Kate Knights

Date of report: 18 January 2024

Background papers: TPO BA/2023/0027/TPO

Appendix 1: Statement of Case - Provisional TPO at Crabbett's Marsh, Horning

Appendix 1 – Statement of Case – Provisional TPO at Crabbett’s Marsh, Horning

1. Introduction

- 1.1. It is the Authority’s practice to provide Members with a Statement of Case, outlining the issues under consideration.
- 1.2. Two objections been raised to the provisional TPO.
- 1.3. As well as the points raised by the objector and the Authority’s response which are set out in the table below, there are other considerations. The woodland consists of a variety of trees including alder, birches and willow. They will have some longevity of life and they are considered to contribute to the visual amenity of the area. More generally, trees increase resilience to climate change and improve air quality in the area, aid biodiversity and encourage wildlife, particularly given the significance of the carr woodland habitat.

2. Representations and responses

- 2.1. The issues raised by the objector and the response provided by the Broads Authority’s Arboricultural Consultant and Head of Planning are set out below:

No.	Representation	Response
1	<p>Challenge of the legitimacy of the TPO for the following reasons:</p> <ul style="list-style-type: none"> 1. the conservation of the woodland alone is not enough to justify a TPO and Crabbett’s Marsh is not a SSSI; 2. Maintenance of vehicular access must continue to be maintained and the objector will support any objection by the Marsh Roadway maintenance to interference by the Broads Authority on the maintenance, repair and management of the road; 3. There is no public access to the TPO’d area and there cannot therefore be any amenity value; 4. The objector reserves the right to invoke para 082 immediately in order to ‘abate a nuisance’ pertaining to any tree that interferes with tiles or guttering of their building or could be reasonably expected to so in inclement weather and the email 	<p>The Broads Authority is the Local Planning Authority for the area. In line with the Town and Country Planning Act 1990, if it appears to a Local Planning Authority that it is expedient, in the interests of amenity, to make provision for the preservation of trees or woodlands in their area, they may for that purpose make an order with respect to such trees, groups of trees or woodlands as may be specified in the order.</p> <p>Given both the high amenity value as well as the importance of wet woodlands, a rare woodland type, as well as the associated high biodiversity value for Crabbett’s Marsh, it is wholly appropriate and legitimate of the Broads Authority to serve the Tree Preservation Order to</p>

No.	Representation	Response
	<p>to the BA is formal notification of that putting the BA on notice;</p> <p>5. Plot K has a Lawful Development Certificate and is classed as a residence for Council Tax purposes and includes ‘a garden or grounds’. Government guidance states that it would be unlikely for a garden to be covered by a Woodland TPO;</p> <p>6. The Broads Authority do not have the authority to serve TPOs being unelected, unaccountable and policing themselves;</p> <p>7. The TPO does not improve navigation, one of the BA’s purposes and so it places the BA in contravention of its own remit;</p> <p>8. The objector has an inordinate dislike of unelected bodies imposing sanctions on taxpayers.</p>	<p>protect this distinctive woodland habitat.</p> <p>A Tree Preservation Order is not made to prevent any works to trees but to control inappropriate works and potential harm to trees. In this case any reasonable works required to ensure the unhindered access along the principal access road through Crabbett’s Marsh, to Bureside Estate, will be approved. The Broads will work with owners of the properties within the Marsh to ensure the best management of the trees and woodland.</p> <p>With regards the relevance of the ‘Woodland Order’ in reference to ‘a garden or grounds’, as the property is set within and surrounded by Crabbett’s Marsh woodland the order is clearly appropriate.</p> <p>As with the principle access through the woodland, trees affecting navigation will be dealt with in a similar manner. The Broads Authority will seek to work with landowners to ensure the best management of the trees and woodland and any application for reasonable works to provide unhindered navigation will be approved.</p> <p>A number of the other matters raised are not relevant to the consideration of the TPO.</p>
2	<p>Objects on the basis that there is an 8 week wait for applications to carry out works to dead, fallen or falling trees either side of the roadway or on the North of the sleeper path, which would be dangerous and a safety concern to plot holders and residents. Trees</p>	<p>This is incorrect as under the Town and Country Planning Act 1990, where it is “urgently necessary to remove an immediate risk of serious harm” consent is not required. In these cases, the owner/applicant would be asked/advised to provide</p>

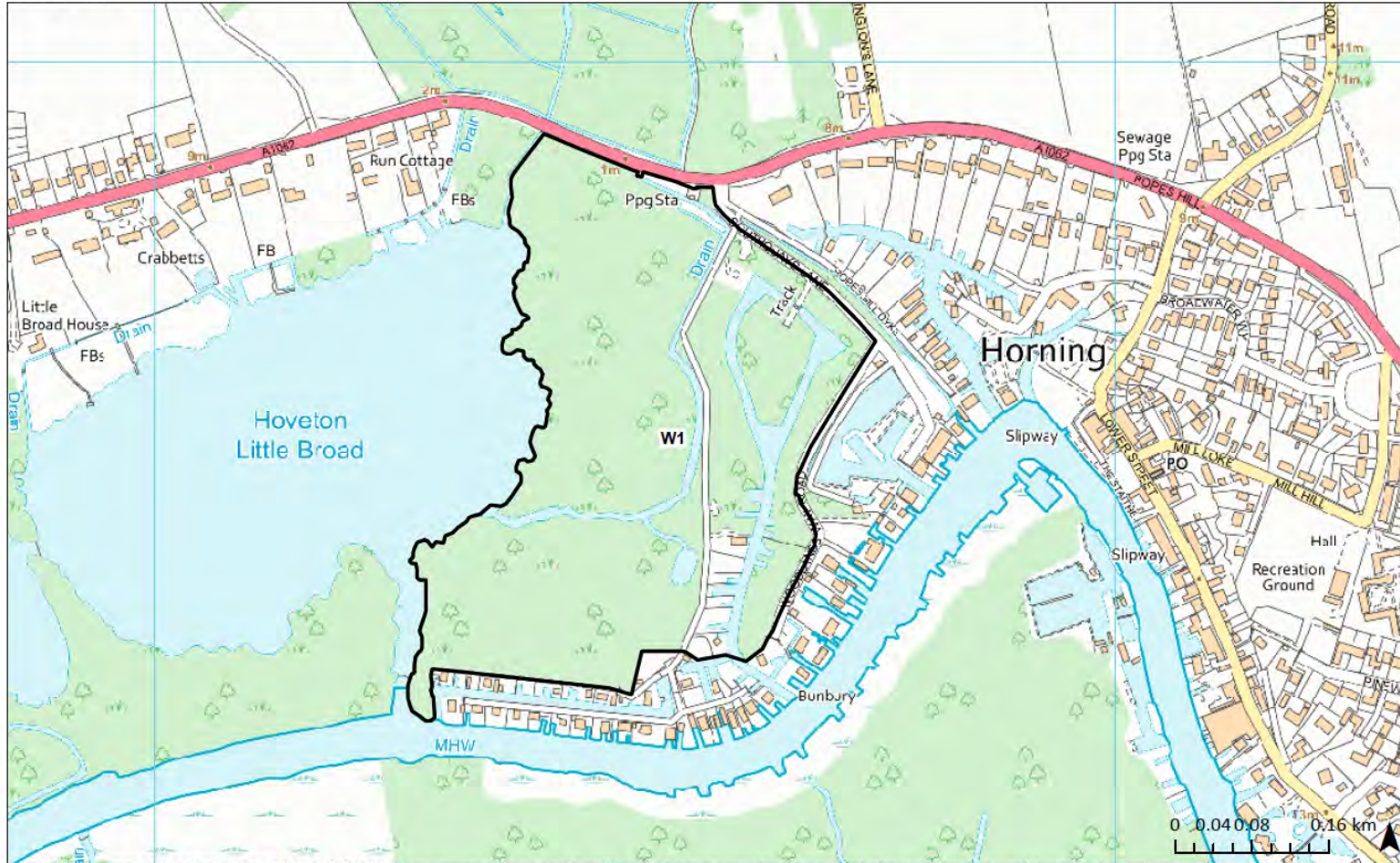
No.	Representation	Response
	need to be managed and replaced when they reach the end of their life.	photographic evidence of the tree in question, to the Broads Authority, prior to undertaking the required works, both to protect themselves and the Broads from potential future allegations of illegal works/felling.

2.2. Members should consider this Statement of Case when carrying out the site visit and when considering whether to confirm the TPO.

Appendix 1 – Location map

BA/2023/0027/TPO - Crabbetts Marsh, Horning

Scale: 1:5,000



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Planning Committee

02 February 2024

Agenda item number 12

Thorpe St Andrew Neighbourhood Plan- Proceeding to referendum

Report by Planning Policy Officer

Summary

The Thorpe St Andrew Neighbourhood Plan and the representations received on the submitted Plan during the publication stage have been subject to an independent examination by a suitably qualified individual who endorsed the Plan, with some changes, for referendum.

Recommendation

To support the Examiner's report and support the Thorpe St Andrew Neighbourhood Plan proceeding to referendum.

1. Introduction

- 1.1. The submitted Thorpe St Andrew Neighbourhood Plan was approved by the Broads Authority at Planning Committee in May 2023. This was followed by a statutory publication period between 10 July and 21 August 2023 in which the Plan and its supporting documents were made available to the public and consultation bodies via the [Broadland District Council website](#).
- 1.2. During the publication period, representations from many different organisations/ individuals were received. The representations can be viewed [here](#).
- 1.3. These representations were submitted, along with the Neighbourhood Plan and supporting information, to the independent Examiner, Mr Andrew Ashcroft. The examination was conducted via written representations during the later part of 2023 (the Examiner deciding that a public hearing would not be required).
- 1.4. Legislation directs that an Examiner considers whether:
 - a) the draft plan meets the 'basic conditions'¹ of a Neighbourhood Development Plan,

¹ [Neighbourhood planning: The basic conditions a draft neighbourhood plan must meet to proceed to referendum - GOV.UK \(www.gov.uk\)](#)

- b) the draft plan complies with the definition of a Neighbourhood Development Plan and the provisions that can be made by such a plan,
 - c) the area for referendum should extend beyond the neighbourhood area, and
 - d) the draft plan is compatible with the Convention rights.
- 1.5. Planning legislation states that once a local planning authority has been issued with an Examiner's report, they must consider the recommendations. If the Authority is satisfied with the Examiner's recommendations, then any specified modifications should be made before the Plan proceeds to referendum.
- 1.6. If the Broads Authority and Broadland District Council are satisfied, then they will need to publicise their decision (a decision statement) and move to a referendum (should that be what the examiner recommends). If they are not satisfied, then they must refuse the plan proposal and publicise their decision. This decision would be subject to a further six-week consultation, with a possibility of a further independent examination.

2. The Examiner's report

- 2.1. The Examiner's report concludes that, subject to amendments (as set out in the report), the Neighbourhood Plan can proceed to referendum. The Examiner also concluded that the area of the referendum does not need to be extended beyond Thorpe St Andrew. The report can be found [here](#).
- 2.2. It is therefore recommended that Planning Committee support the Examiner's report and support the Thorpe St Andrew Neighbourhood Plan proceeding to referendum.

3. Next steps

- 3.1. Should the Examiner's recommendations be met with full approval by Broadland District Council and the Broads Authority, then a decision statement will be produced which will be published, along with the Examiner's report, on the Broads Authority and Broadland District Council's website and made available in the other locations. Broadland District Council will make the appropriate amendments to the plan as set out in the Examiner's Report.
- 3.2. Should the recommendation be to proceed to a referendum, then the next steps will involve Broadland District Council publishing information and giving at least 28 days' notice of the referendum (not including weekends and Bank Holidays). Again, this information will be made available on the Broadland District Council and Broads Authority websites and likely made available by Broadland District Council.
- 3.3. The referendum will likely not be until April at the earliest.
- 3.4. If more than half of the people who vote in this referendum vote in favour of the proposal then Broadland District Council and Broads Authority must adopt/make the Neighbourhood Plan as soon as reasonably practicable, unless it considers that this

would breach or be incompatible with any EU obligation or the Human Rights Convention.

- 3.5. This means that, should the referendum result support the Neighbourhood Plan, then the Plan would be subject to Broadland District Council and the Broads Authority ratification before it is 'made', although the NPPG says that 'A neighbourhood plan comes into force as part of the statutory development plan once it has been approved at referendum'.
- 3.6. Should the local planning authority propose to make a decision that differs from the Examiner's recommendations (and the reason for the difference is wholly or partly as a result of new evidence or a new fact or a different view taken by the authority about a particular fact) then they:
 - Are required to notify all those identified in the consultation statement about this position and invite representations; and
 - May refer the issue to an independent examination if they think it appropriate.

4. Financial Implications

- 4.1. Officer time in assisting Broadland District Council with the Neighbourhood Plan process. Referendum and examination costs have been borne by Broadland District Council.

5. Recommendation

That the Planning Committee support the Examiner's report and support the Thorpe St Andrew Neighbourhood Plan proceeding to referendum

Author: Natalie Beal

Date of report: 11 January 2024

Planning Committee

02 February 2024

Agenda item number 13

Consultation responses

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently and invites members' comments and guidance.

Recommendation

To note the report and endorse the nature of the proposed response.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 15 January 2024

Appendix 1 – Future Homes and Building Standards 2023 consultation

Appendix 2 - Belton with Browston, Burgh Castle and Fritton with St Olaves Neighbourhood Plan

Appendix 1 – Department for Levelling Up, Housing and Communities

Document: The Future Homes and Buildings Standards: 2023 consultation [The Future Homes and Buildings Standards: 2023 consultation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation)

Due date: 06 March 2024

Status: Technical consultation

Proposed level: Planning Committee endorsed

Notes

The UK government has set a legally binding target of reaching net zero greenhouse gas emissions by 2050. From homes to offices, the UK's built environment is responsible for around 30% of the UK's greenhouse gas emissions; decarbonising new buildings is an important part of that challenge. As set out in the [Heat and Buildings Strategy](#), this also presents substantial opportunities for the UK: to grow skills, build diverse job markets, level up across the country, reduce bills by improving efficiency, tackle fuel poverty, have warmer and better buildings, and ensure our energy system is secure and fit for the future.

The minimum energy efficiency requirements for new homes and non-domestic buildings are set through Part L (Conservation of fuel and power) of Schedule 1 and Part 6 of the Building Regulations. In 2021 the government implemented an uplift to Part L and introduced regulations to reduce overheating risk in new residential buildings (Part O), which came into effect on 15 June 2022. As a result of the uplift, new homes and non-domestic buildings are now expected to produce significantly lower carbon emissions compared to those built to the 2013 standards. The uplift represents an important step towards a cleaner, greener and safer built environment.

While progress has been made, the [Heat and Buildings Strategy](#) outlines the need to eliminate virtually all emissions arising from heating, cooling and energy use in our buildings. The 2025 Future Homes and Buildings Standards aim to build on the 2021 Part L uplift and set even more ambitious requirements for energy efficiency and heating for new homes and non-domestic buildings. These standards will be in line with meeting our 2050 net zero target and will mean no further work will be needed for new buildings to produce zero carbon emissions as the electricity grid decarbonises. They can also reduce running costs, and, coupled with improvements already made to ventilation and energy efficiency standards, can prevent damp and mould, excess cold and heat, and improve air quality. Delivering warm, safe and decent homes is a priority for government in setting these new standards.

Proposed response

- a) We agree with a definition of “Zero-Carbon Ready¹” that ensures that they will be zero-carbon once the grid decarbonises. This is an effective ban on new fossil heating systems and should be supported.
- b) We disagree with separating out embedded emissions from usage emissions. There is significant government investment through various initiatives, including the Paludiculture Exploration Fund, in developing new domestic crops that can be grown on wetlands unsuitable for other cultivation and farming. The primary identified market is in building materials and other uses for biobased fibres, for which there is potentially a strong domestic supply. These materials can offer significant advantages through the lifecycle of a building:
- Embodied carbon is generally very low, and the resources are entirely renewable.
 - In some cases the materials have the potential to be negative emission – for example there are some biobased materials that include biochar as a material.
 - Whilst in use they provide carbon storage within their materials in the same manner as timber. However, unlike timber the crops can be harvested annually or bi-annually, and without reducing the overall climate benefits of the land management approach.
 - At end of life, they are easily disposed of without further risk to the environment.
 - These materials are still at the development and testing stage, and as such are not available for general use in the UK, as they will need to pass through the certification process to guarantee certain aspects (such as fire resistance).

However, as innovative materials, whilst having the potential to reduce the overall footprint of a building over its lifetime, it is not yet clear whether they would be able to compete with the most advanced synthetic materials.

Essentially, if a material can have a significant overall lifetime reduction to the energy and environmental footprint of the building, even if that leaves the overall usage of the building below the optimum, it would be helpful to have a way for that to be taken into account.

- c) 4.2 says ‘Option 1 has an estimated additional capital cost of £190 per dwelling. As with the proposed notional buildings for homes not connected to heat networks outlined above, the inclusion of low-carbon heat will deliver significant carbon savings, while the addition of solar panels will push up capital costs while giving bill savings for occupants; Option 2 will be proportionately cheaper to build, at the cost of higher bills for households’.

How much is ‘proportionately cheaper’ and ‘higher bills’ compared to option 1? Option 1 is £190 which does not seem a lot in the grand scheme of things... so how much more will option 2 cost?

¹ meaning no further work will be needed for them to have zero carbon emissions once the electricity grid has fully decarbonised

- d) Sections 4.2.2² and 4.2.3³ seem to involve a methodological assumption that appears wrong. Essentially, the position is that as the grid decarbonises, use of electricity becomes greener, so efforts to reduce your own energy use and install your own solar become less valuable as an emissions avoidance technique. This ignores the fact that for the grid to decarbonise, someone still has to make those savings and install solar. So, the approach should be to compare these energy savings to energy savings that are proposed elsewhere, rather than just dismiss the advantage of energy savings.
- e) Section 4.2.4 – Notional Building options – build costs do influence prices, but this may not always be the main driver. A main driver of house cost is land value, if houses cost more to build, land price will fall. We would also note that given the steepness in the Energy GHG emissions required to keep the Broads in line with the UK carbon budget (13% per year), any lessening of new build standards, however small they are in the overall picture, pushes us off target.
- f) Question 53 & 54 – If we are going to promote the use of our rivers in urban areas for water source heat networks, allowing sleeving seems a sensible way forward.
- g) Question 69 – about using local weather – will this be monitored to reflect a changing climate?

² 4.2.2 says, inter alia: However, while the efficiency of solar PV panels has improved substantially over the last decade, the pace of electricity grid decarbonisation means that solar PV panels make a relatively small contribution to the carbon savings of individual homes compared with the switch to low-carbon heating

³ 4.2.3 says, inter alia: Grid decarbonisation also means that fabric improvements are increasingly not a cost-effective intervention to reduce carbon

Appendix 2 – Belton with Browston, Burgh Castle and Fritton with St Olaves Neighbourhood Plan

Document: [Neighbourhood Plan – Belton with Browston Parish Council \(norfolkparishes.gov.uk\)](https://www.norfolkparishes.gov.uk)

Due date: 28 January 2024

We have an extension to after this Committee.

Status: Regulation 14

Proposed level: Planning Committee Endorsed

Notes

The Neighbourhood Plan says: This NP contains non-strategic policies to support and add further detail to policies already adopted, specifically for Belton with Browston, Burgh Castle, and Fritton with St Olaves as the designated neighbourhood area. This includes further detail on design, housing, the natural and historic environment, and community services. Where there are policy details missing that are important to the parishes, or where it was felt that a slightly different policy is needed, then new non-strategic Policies have been developed for this NP. Some of the Policies are not strictly ‘planning’ related, but it was felt that they were important enough to include in the Plan and identify as ‘Community Actions’. These are actions that the Parish Councils and local community will lead on, rather than come through the planning system.

Proposed response

Summary of response

The Plan is welcomed. The comments seek clarity at this stage of plan making.

Detailed comments

In terms of developments at Holiday parks, you may wish to encourage and enable the use of seasonal buses – apparently the scheme at Vauxhall Holiday park has been very successful. [A new bus route is coming to Great Yarmouth this summer | Great Yarmouth Mercury](#)

Suggest you put a year on the front of the Plan.

Images need alt text.

Para 22 – local plans plural

Policy 1 – only talks about residential development. What about other types of development?

Para 67 – the sentence about questionnaires and public engagement seems to not belong there – not sure of the relevance.

Para 67 – who is ‘we’?

Para 68 – should the access be safe and convenient?

Policy 4 – are a:f ‘and’ – as in all need to be met? I am guessing it should be and.

Policy 4: g) seems like a separate criterion that does not form part of the list. Firstly, reading point g after the intro text to the list does not work in sentence form. But also, part g is not just about affordable housing.

Policy 4 – if this is meant to include community led development, it is contrary to the NPPF – the NPPF at para 73b says such sites need to be adjacent to existing settlements whereas policy 4 talks about outside of development boundaries.

Policy 4, g bullet 1: using the word ‘it’ is not clear. I think this is what you mean: ‘Is demonstrated through financial appraisal that ~~it~~ some market housing is essential to deliver affordable housing or other community benefits on-site’.

Policy 4 – I am not convinced that market dwellings outside of development boundaries to act as enabling development for community benefits. Firstly, this could be located far from the settlement and therefore far from the community to which it benefits and therefore how can this thing benefit the community if it is not linked somehow. Secondly, the reasons for market housing outside of settlement/development boundaries are listed in the Local plan for the Broads policy SP15, 2, iv – this is a strategic policy and therefore it seems that Policy 4 part G is contrary to SP15 of the Local Plan for the Broads. Thirdly, the policy does not meet NPPF para 80 – community benefits is not listed as a reason for market dwellings outside of development boundaries/in isolated locations.

Para 95 – what is pedestrian amenity? River Waveney.

Para 97 – Many of the sites **are** shown?

Policy 5 – are applicants expected to fill out the checklist?

Policy 6 – BNG will be in place for large schemes and maybe for smaller schemes by the time this Plan is made, but I note that this policy seeks BNG for all proposals that increase developed floor space whereas the mandatory schemes has some exemptions. What is the intention? To have this policy in case BNG does not become mandatory? Or if it is in place, change schemes to which it applies? Or remove the policy later on when BNG confirmed as being in place? We don’t necessarily object to the policy or that it changes the types of schemes to which BNG applies, just asking what you plan to do.

Para 117 – what do you mean by ‘night lights’? Do you mean levels of darkness?

Para 122 – should this refer to the BA’s policy on community facilities?

Evidence base

Figure 4 and 5, 6, 7, 8, 9, 10, 11, 15, 17, 18, 28, 33 are from the 2011 Census – 2021 Census data is available.

Figure 28 – what are the initials in the title row?

Page 80 – Broads has a status equivalent to a National Park.

SEA and HRA

Figure 7 uses 2011 Census

Design Guide

We made these comment at the health check stage and they have not been amended. Please amend the Design Guide in line with these comments.

1.2 – ‘the current adopted Local Plan’ – think you mean GY Local Plan as there are two Local Plans relevant to the area.

The images need to have alt text.

3.4 – ends with ‘of the...’ but the sentence is not finished anywhere.

Planning Committee

02 February 2024

Agenda item number 14

Local Plan Preferred Options- Bitesize pieces

Report by Planning Policy Officer

Summary

This report introduces some new or amended policies that are proposed to form part of the Preferred Options version of the Local Plan. The policies are relating to elderly and specialist needs housing, road schemes on the Acle Straight (A47T), fibre to premises, Utilities Site, ‘Your part of the Broads’, embodied carbon, climate change, energy demand and performance, renewable energy, BREEAM for non-residential buildings and resilient design. There are also Topic Papers on renewable energy (with policies), wind, floating buildings and employment and a Local Infrastructure Study.

Recommendation

Members’ comments on the policies and Topic Papers are requested.

1. Introduction

- 1.1. The first stage of the production of the Local Plan is the preparation of the Issues and Options. These were presented to Members in ‘bite size pieces’ over a number of months, rather than as a complete document of Issues and Options. The production stages of the Issues and Options are now complete and work is underway on the Preferred Options version, which will contain proposed policies. This is also presented in “bitesize pieces”.
- 1.2. This report introduces some amended or new policies for Members to consider for inclusion in the Preferred Options version of the Local Plan.
- 1.3. It is important to note that until such time as the Local Plan is adopted, our current policies are still in place and will be used to guide and determine planning applications.
- 1.4. Members’ comments are requested on the policies and amendments. The policies considered in this report at this Planning Committee are relating to elderly and specialist needs housing, road schemes on the Acle Straight (A47T), fibre to premises, Utilities Site, ‘Your part of the Broads’, embodied carbon, climate change, energy demand and performance, renewable energy, BREEAM for non-residential buildings and resilient design. There are also Topic Papers on renewable energy (with policies), wind, floating buildings and employment and a Local Infrastructure Study.

Author: Natalie Beal

Date of report: 18 January 2024

- Appendix 1: [Elderly and specialist needs housing](#)
- Appendix 2: [Road schemes on the Acle Straight \(A47T\)](#)
- Appendix 3: [Fibre to premises](#)
- Appendix 4: [Utilities site, Norwich](#)
- Appendix 5: [Your part of the Broads](#)
- Appendix 6: [Embodied Carbon](#)
- Appendix 7: [Climate change](#)
- Appendix 8: [Climate change adaptation and resilience checklist](#)
- Appendix 9: [Energy demand and performance](#)
- Appendix 10: [Non-residential development and BREEAM](#)
- Appendix 11: [Heat resilient design](#)
- Appendix 12: [Renewable energy topic paper and policy](#)
- Appendix 13: [Wind energy topic paper](#)
- Appendix 14: [Floating buildings topic paper](#)
- Appendix 15: [Local infrastructure study](#)
- Appendix 16: [Employment and Economy topic paper](#)
- Appendix 17: [Quay heading and boardwalks materials](#)
- Appendix 18: [Gypsy, traveller and travelling show people](#)
- Appendix 19: [Strategic housing needs policy](#)



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
January 2024**

Elderly and specialist needs housing

Information for Members

We received the following comments as part of the Issues and Options consultation.

It should be noted that the County-wide needs work does not separate out a need number for older person's housing to the Broads. Indeed, as a reminder, the need that we plan for in the Local Plan, and any permissions granted, count towards the need of the district they are located in. Our need is not additional to the need of our districts. As such, it is not proposed to include a need in the Local Plan, but rather have a generic criteria-based policy. We will make a category in the call for sites section for elderly and specialist needs housing.

Part of document	Organisation	Comment	Response	Action for next version of the Local plan
DM41 -Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Environmental The proposal provides a number of key environmental benefits by: •Making more efficient use of land thereby reducing the need to use limited land resources for housing. •Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions. •Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.	Noted.	See responses to other comments from McCarthy Stone.
DM41 -Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Given all these factors, evidence and the guidance of the PPG, the council should initially ensure that the Housing Needs for older persons' housing is identified in the plan. We then consider that the best approach is for the plan to identify the level of housing needed to meet the requirement of older people in the Broads Authority area and to allocate specific sites to meet the that are in the most sustainable locations close to key services. The plan should also continue to include a standalone policy actively supporting the delivery of specialist older people's housing, however some more flexibility should be applied to this compared to the existing policy.	All Norfolk LPAs worked with Norfolk County Council Independent Living and Supported Living Teams to look into the need for such housing. Whilst the Broads Authority is part of this work, no specific need is identified for the Broads Authority. This is because data is not available for the Broads. The boundary is such, that, for example, not one entire postcode area is within the Broads. The same is similar for other typical areas like Lower Super Output areas. That is why, taking market housing need as an example, the Standard Methodology does not apply to areas like the Broads – indeed, we have to commission bespoke evidence. It is also important to understand our area is part of 6 districts. Our need is part of their need, not additional to their need. The Broads Authority is open to development of the right type, in the right place, of the right design. Indeed, that is what policy DM41 allows. So, it is not clear how a need can be identified for the Broads. Further, we held a call for sites as part of the Issues and Options consultation and no sites have been put forward for elderly or specialist need housing. If MS have sites, please feel free to contact us to discuss them. Also, if MS have any comments on the policy DM41 then please do let us know.	Liaise with Norfolk County Council Officers in the first instance regarding this comment. Ask McCarthy Stone if they wish to put any sites forward and if they wish to propose changes to DM41.
DM41 -Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Developers should not be required to demonstrate need for older persons housing, given the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments "help reduce costs to the social care and health systems" (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.	Suggested amendments to the existing policy noted and we will consider these as we draft the Preferred Options version.	Consider this comment as produce Preferred Options version of the Local Plan.
DM41 -Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council: "The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice,	Suggested amendments to the existing policy noted and we will consider these as we draft the Preferred Options version.	Consider this comment as produce Preferred Options version of the Local Plan.

Part of document	Organisation	Comment	Response	Action for next version of the Local plan
		particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”		
DM41 - Benefits of Older Persons’ Housing	McCarthy Stone/The Planning Bureau Limited	Older peoples’ housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.	Background information noted.	See responses to other comments
DM41 - Benefits of Older Persons’ Housing	McCarthy Stone/The Planning Bureau Limited	<p>Economic</p> <p>A report ‘Healthier and Happier’ An analysis of the fiscal and wellbeing benefits of building more homes for later living” by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:</p> <ul style="list-style-type: none"> • ‘Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. • Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year. • On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.’ <p>A further report entitled Silver Saviours for the High Street : How new retirement properties create more local economic value and more local jobs than any other type of residential housing (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme built in a sustainable location, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open and high streets vibrant.</p>	Background information noted.	See responses to other comments

Part of document	Organisation	Comment	Response	Action for next version of the Local plan
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first- time buyers (Aug 2020)" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.	Background information noted.	See responses to other comments
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	<p>Social Retirement housing gives rise to many social benefits:</p> <ul style="list-style-type: none"> • Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder. • Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns. • The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living. 	Background information noted.	See responses to other comments
DM41 - general	McCarthy Stone/The Planning Bureau Limited	<p>We note that the existing local plan contains policy DM41 Elderly and Specialist Needs Housing that deals specifically with older persons housing and states 'Proposals for the development of or change to elderly or specialist needs housing will be supported if they are located within a development boundary and they have regard to: i) The local need for the accommodation proposed; ii) Whether the proposal would result in an undue concentration of such provision in the area; and iii) Impact upon amenity, landscape character, the historic environment and protected species or habitats.'</p> <p>The existing Local Plan was adopted just before the government updated the PPG with a new section on Housing for Older and Disabled People now recognising the need to provide housing for older people. Page 14 of the Issues and Options document identifies the PPG as relevant. Of relevance paragraph 001 Reference ID: 63- 001-20190626 of the PPG states: "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid- 2041 this</p>	Background information noted.	See responses to other comments

Part of document	Organisation	Comment	Response	Action for next version of the Local plan
		is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking” (emphasis added).		
DM41 - general	McCarthy Stone/The Planning Bureau Limited	Paragraph 003 Reference ID: 63-003-20190626 recognises that “the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.” Thus, a range of provision needs to be planned for and recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing or adaptable housing is important. Paragraph 006 Reference ID: 63-006-20190626 sets out “plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”	Background information noted.	See responses to other comments
DM41 - Need for older persons' housing	McCarthy Stone/The Planning Bureau Limited	It is well documented that the UK faces an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to 5 million (ONS mid 2018 population estimates). Between 2014 and 2039, the ONS project that over 70 per cent of projected household growth will be made up of households with someone aged 60 or older. It is generally recognised (for example The Homes for Later Living Report September 2019). That there is a need to deliver 30,000 retirement and extra care houses a year in the UK to keep pace with demand. The Mayhew Review Future-proofing retirement living’ recommends ‘an accelerated programme of retirement housing construction with up to 50,000 new units a year’. Although there are no apparent specific statistics for older people for the Broads Authority area both the ‘Study of Demand for Specialist Retirement housing and Accessible housing for Older People in Norfolk’ and the ‘Great Yarmouth Borough Council and The Broads Authority Local housing Needs Assessment 2022, version 2’ imply that the authority is anticipating an increase in the older persons population. This can be supported by looking at the age profile of Norfolk as a whole that can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 219,260 persons aged 65 and over in 2018, accounting for 24.3% of the total population of the County. This age range is projected to increase by 92,196 individuals, or 42%, to 311,456 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 30.2% of the total population of the County by 2043.	Background information noted.	See responses to other comments

Part of document	Organisation	Comment	Response	Action for next version of the Local plan
DM41 - Need for older persons' housing	McCarthy Stone/The Planning Bureau Limited	<p>In 2018 there were 60,914 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 48,822 individuals, or 80.2%, to 109,736 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Norfolk's residents, accounting for 6.7% of the total population in 2018 and increasing to 10.7% by 2043. It is therefore clear there will be a significant increase in older people over the Plan Period in Norfolk which will include the Broads Authority area and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan. The Plan should be ensure that the policy approach to meet the housing needs of older people is up to date and addresses the need.</p>	Background information noted.	See responses to other comments

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

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Policy DM41: Elderly and specialist needs housing

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1. Proposals for the development of or change to elderly or specialist needs housing will be supported, subject to other relevant policies in the Local Plan, if they are located within a development boundary and they have regard to:

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i) The local need for the accommodation proposed;

ii) Whether the proposal would result in an undue concentration of such provision in the area; and

iii) Impact upon amenity, landscape character, the historic environment and protected species or habitats.

2. Proposals will need to be designed to use water efficiently.

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Reasoned Justification

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This policy reflects the ageing population of the Broads Authority Executive Area. The NPPG says '*older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan*'.

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~~Older people in housing are included in the Objectively Assessed Need as calculated in the Central Norfolk SHMA. However, those in Class C2 are not included. According to the Central Norfolk SHMA, the institutional population (older people residing in care homes) is projected to increase by 3,909 persons between 2015 and 2036 in the Central Norfolk SHMA authority areas (North Norfolk, Norwich, Broadland, South Norfolk, Breckland). The OAN as set out previously in this section does not include this figure.~~

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Working together, the Norfolk LPAs commissioned research into the demand for specialist retirement housing and accessible housing for older people¹ which was completed in

¹ [Study of demand for specialist retirement housing and accessible housing for older people and related planning and viability issues \(north-norfolk.gov.uk\)](http://north-norfolk.gov.uk)

28 November 2021. This report looks at demand for specialist retirement housing as well as for
29 care homes, dementia housing and accessible and wheelchair housing in Norfolk. This
30 concluded:

- 31 a) across the whole of Norfolk in 2020 there is unmet need for 2,809 units of extra care
32 housing² and 3,203 units of sheltered housing. By 2041 these figures will have risen to
33 5,130 and 9,644 respectively.
34 b) there is a need for over 6,500 more C2³ bed spaces in 2041 across Norfolk.
35 c) that at least an additional 26,800 adaptable homes⁴ will be required across Norfolk
36 between 2016 and 2036 and at least 27,600 will be required between 2016 and 2041.

37 The Waveney SHMA finds that 29.3% of households in the Waveney HMA were older person
38 only households (households where all members are 65 or over) and that the population
39 aged 65 or over is going to increase dramatically from 30,131 in 2014 to 42,427 in 2036 in
40 the Waveney HMA, a rise of 40.8%. The Projecting Older People Information System (POPPI)
41 website indicates that the proportion of older persons living alone is projected to increase
42 from 36.5% in 2015 to 38.4% in 2030.

43 The studies present information at a district council level, and do not identify a need for
44 elderly housing specifically in the Broads Authority Executive Area. The Authority has
45 therefore taken the approach of a criteria-based policy in relation to elderly housing needs
46 to enable applications to be assessed.

47 **However,** It does not necessarily follow that all this need should be provided as additional
48 bed spaces in residential institutions in Use Class C2. The Government's reform of Health
49 and Adult Social Care is underpinned by a principle of sustaining people at home for as long
50 as possible, thereby avoiding expensive hospital and care home services. Therefore, despite
51 the ageing population, current policy means that the number of care home and nursing
52 home beds needed may increase proportionately more slowly than the number of older
53 people, as people are supported to continue living in their own homes for longer.

54 Of relevance to housing for older people are the following policies of the Local Plan:

- 55 • Policy DM39 refers to residential ancillary accommodation, acknowledging that
56 residential annexes to an existing dwelling can create a useful facility for the support and
57 care of family members.
58 • Policy DM43 relates to design, and in particular dementia and lifetime homes and
59 adaptable homes.

² Retirement housing with a high level of services and facilities, meals and personal care services. Seen as an alternative to residential care. Sometimes referred to as "Housing with Care".

³ Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres. Care homes provide accommodation and personal care for people who need extra support in their daily lives. Personal care might include help with eating, washing, dressing, going to the toilet or taking medication. Some care homes also offer social activities such as day trips or outings. Care homes are sometimes referred to as residential homes. Nursing homes provide personal care as well as assistance from qualified nurses. These are sometimes called care homes with nursing.

⁴ Accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include additional features to meet the needs of occupants who use wheelchairs or allow for adaptations to meet such needs.

60 The Authority considers it important for this accommodation to be within development
61 boundaries (See DM35) so they are close to services and facilities to provide benefits to
62 residents, staff who work there and visitors as well as being accessible by a variety of modes
63 of transport.

64 **Reasonable alternative options**

- 65 a) Original policy
- 66 b) No policy

67 **Sustainability appraisal summary**

68 The options of having a policy, the original policy and not having a policy have been
69 assessed in the SA. The following is a summary.

A: Original policy	7 positives. 0 negatives. 0 ? Overall, positive.
B; Amended policy	8 positives. 0 negatives. 0 ? Overall, positive.
C: No policy	0 positives. 0 negatives. 8 ?

70 **How has the existing policy been used since adoption in May 2019?**

71 According to recent Annual Monitoring Reports, the policy has been used and schemes are
72 in general conformity with the policies.

73 **Why have the alternative options been discounted?**

74 Given the ageing population of the area, a policy that guides elderly and specialist housing is
75 favoured.

76 **UN Sustainable Development Goals check**

77 This policy meets these [UN SD Goals](#):

3 GOOD HEALTH
AND WELL-BEING



11 SUSTAINABLE CITIES
AND COMMUNITIES



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

		A: Original policy	B: Amended policy	B: No policy	
ENV1	+	Policy requires such accommodation to be provided in development boundaries.	+	Policy requires such accommodation to be provided in development boundaries.	?
ENV2			+	Policy specifically refers to water efficiency.	?
ENV3	+	Policy specifically refers to biodiversity.	+	Policy specifically refers to biodiversity.	?
ENV4	+	Policy specifically refers to landscape character.	+	Policy specifically refers to landscape character.	?
ENV5	+	Policy specifically refers to heritage.	+	Policy specifically refers to heritage.	?
ENV6					
ENV7					
ENV8					
ENV9					
ENV10					
ENV11					
ENV12					
SOC1	+	Policy relates to specific accommodation for older people or those with specialist needs which will benefit their health and wellbeing.	+	Policy relates to specific accommodation for older people or those with specialist needs which will benefit their health and wellbeing.	?
SOC2					
SOC3					
SOC4	+	Policy relates to specific accommodation for older people or those with specialist needs.	+	Policy relates to specific accommodation for older people or those with specialist needs.	?
SOC5					
SOC6	+	Policy requires sites to be in development boundaries.	+	Policy requires sites to be in development boundaries.	?
SOC7					
ECO1					
ECO2					
ECO3					

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty.



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
February 2024**

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

1 **Policy POSSA47: Road schemes on the Acle Straight (A47T)**

2 **See Map: Appendix N: Acle Straight and considerations/constraints**

- 3 1) The Authority will work proactively with promoters and designers of any schemes /proposals for
4 changes to the Acle Straight at an early stage and throughout the process, especially at the
5 feasibility and design stages.
- 6 2) Any proposed scheme will need to be justified. Proposed schemes need to consider whether
7 there is a negative impact on protected designated sites beyond reasonable scientific doubt
8 (any road scheme would be subject to project level HRA) and the special qualities of the Broads
9 and the fact that it is a protected landscape of national importance. Proposals will need to
10 undertake comprehensive scoping of constraints and opportunities at the earliest stage to set
11 out the nature and scale of any resultant impacts (negative or positive) from proposals,
12 demonstrate how any negative impacts would be avoided, mitigated or compensated and take
13 opportunities to enhance the special qualities of the area and people's enjoyment of them.
14 Proposals need to demonstrate they are the least environmentally damaging way of achieving
15 the aims.
- 16 3) Transport infrastructure, including roads, accesses, bridges, lighting, signing, other street
17 furniture and public transport infrastructure need to be balanced against the overall impact of
18 the scheme on the special qualities of the Broads and carefully designed and maintained to take
19 full account of the valued characteristics of the special qualities of an iconic and highly
20 protected landscape.

- 21 4) The Authority acknowledges that schemes will be designed to national guidance and
22 requirements. Proposals will need to ensure they consider and address potential impacts to the
23 following locally important characteristics: wildlife, habitats and species, land management
24 practices, landscape, tranquillity and visual amenity, surface water (including pollution risk from
25 spills), existing footpath/Public Right of Way networks and designated or undesignated heritage
26 assets or their setting, including [the Halvergate Marshes Conservation Area](#), ~~waterlogged~~
27 archaeology and ~~traditional~~ [the historic](#) dyke networks.
- 28 5) Lighting in any scheme needs to be ~~kept to a minimum~~, thoroughly justified, [kept to a minimum](#),
29 and well designed so as to not contribute to light pollution.
- 30 6) [Peat will need to be dealt with and disposed of in line with the Peat Policy and Peat Guide.](#)
- 31 7) [The scheme needs to be resilient to a changing climate, in particular increase in temperatures
32 as well as intense rainfall and increased flood risk from neighbouring Breydon Water due to sea
33 level rise.](#)
- 34 8) Schemes will need to consider the provision of a strategic walking and cycling route between
35 Acle and Great Yarmouth and interpretation measures and opportunities to safely enjoy and
36 appreciate the iconic views to the mills and over the marshes.

37 **Constraints and features**

- 38 • Entire length of Acle Straight in Flood Zone 3 (EA mapping) and indicative 3b using SFRA 2017
- 39 mapping.
- 40 • Western end: Damgate Marshes SSSI, Halvergate Marshes SSSI, Broadland SPA, Broadland
- 41 Ramsar site and The Broads SAC.
- 42 • Eastern end: Breydon Water LNR, SSSI, Ramsar Site, SPA, Outer Thames Estuary SPA.
- 43 • Stracey Arms Drainage Mill (listed building) is next to the Acle Straight.
- 44 • Other listed buildings ~~with a view towards~~ [in proximity to](#) the Acle Straight ~~that can be viewed~~
- 45 ~~from the road~~.
- 46 • Halvergate Marshes Conservation Area [\(currently on Historic England's Heritage at Risk](#)
- 47 [Register\)](#).
- 48 • The Broads is a site identified by Historic England as having exceptional potential for
- 49 waterlogged archaeology.
- 50 • Undesignated heritage assets that contribute to the cultural heritage of the area, such as the
- 51 WW2 defences and assets identified on the Norfolk HER and Broads Local List.
- 52 • Numerous accesses to tracks, for example to farms.
- 53 • Numerous level crossings accessed from the Acle Straight.
- 54 • Branch Road junction.
- 55 • Little Whirlpool Ramshorn Snail (*Anisus vorticulus*) is a European protected species.
- 56 • The Acle Straight runs in between railway line and river.
- 57 • Open and flat landscape.
- 58 • Historic dyke networks with associated features.
- 59 • Rights of Way.
- 60 • ~~Future changes resulting from the HLF project.~~
- 61 • Users of the Acle Straight experience HLF congestion regularly.

- 62 • Serious accidents on the Acle Straight are higher than the national average (13%) and the
63 average for Norfolk County (16%).
64 • [Peat soils.](#)

65 Reasoned justification

66 Background to the A47 and Acle Straight

67 The A47 Trunk Road passes through the Broads Authority area and this policy relates to the section
68 of the A47 between Acle and Great Yarmouth, known as the Acle Straight.

69 The A47 is the main east-west connection in northern East Anglia. It links Lowestoft to Great
70 Yarmouth and then with Norwich, King's Lynn and Peterborough to the A1, with connections to the
71 Midlands and the north of England. At Great Yarmouth and Norwich, connections to Europe and
72 beyond are available via the port and airport. New Anglia Local Enterprise Partnership's Economic
73 Strategy considers this route of strategic importance.

74 The Acle Straight is a single carriageway with at-grade roundabouts at each end. This section of the
75 A47 has high vehicle flows including a high use by HGVs resulting in longer and more unreliable
76 journey times, as well as delays and congestion at junctions. The two-way Annual Average Weekday
77 Flow (AAWF) on the A47 at Acle Straight is approximately 21,000 vehicles, including a significant
78 HGV percentage of more than 17% in the AM peak period.

79 [Over the last five years \(to end October 2023\) there were 74 collisions recorded on the Acle
80 Straight, of which 3 were fatal and 16 resulted in serious injuries. National Highways identified in
81 their Route Strategy for the East of England that the Acle Straight has an iRAP star rating of 1¹
82 \(2020\). The higher the rating, the safer the road.](#)

83 ~~The Acle Straight has an accident rate above that of the national average, with a total of 59
84 personal injury accidents occurring in the past 5 years (2011-2016) including 3 fatal and 16 serious
85 injuries. The proportion of fatal and serious accidents for this section of single carriageway road is
86 significantly higher than the national average (13%) and the average for Norfolk County (16%).~~

87 Accidents on the Acle Straight have also resulted in road closures, with traffic having to be diverted
88 onto unsuitable alternative routes. Incident records show that the greatest delays in the area occur
89 due to accidents, with the average delay exceeding over two hours.

90 What could happen to the Acle Straight and why?

91 There is an ambition promoted by the A47 Alliance to dual the A47 for its full length, including the
92 stretch between Acle and Great Yarmouth. The A47 Alliance brings together the business
93 community, local authorities, MPs and stakeholders along the whole of the trunk road route
94 between Peterborough and Lowestoft. Partners, including the Greater Cambridge, Greater

¹ [The star rating protocol, set out by the International Road Assessment Programme \(iRAP\), is a way to measure how safe our roads are. Every five years, our road network is surveyed and independently assessed to calculate star ratings. iRAP Star Ratings are used for road safety inspection, road safety impact assessments, and in designs. Star Ratings are an objective measure of the level of safety which is 'built-in' to the road through more than 50 road attributes that influence risk for vehicle occupants, motorcyclists, bicyclists, and pedestrians. 1- star is the least safe and 5-star is the safest.](#)

95 Peterborough and New Anglia LEAs are working together to make the case for improvements and
96 to secure the investment required to make it happen. ~~This is a long term ambition for post 2021.~~

97 ~~In the medium term, Highways England plan to undertake safety improvements at key locations on~~
98 ~~the Acle Straight.~~

99 In 2014, Government committed to funding six A47 dualling and improvement schemes, one of
100 which was improvements to the Great Yarmouth Harfreys and Vauxhall junctions. Works have
101 begun at Harfreys Roundabout, tying into the Great Yarmouth Third River Crossing. Surveys have
102 been undertaken in preparation for the Vauxhall Roundabout improvement scheme which is still
103 being developed.

104 ~~In December 2014, funding was announced in the Government's Autumn Statement to deliver~~
105 ~~changes along the A47, including safety improvements along the Acle Straight. Two schemes in~~
106 ~~particular are of relevance:~~

- 107 • ~~A47/A12 Great Yarmouth: junction improvements, including reconstruction of the Vauxhall~~
108 ~~roundabout.~~
- 109 • ~~Safety improvements at key hotspots, and joint working with Natural England to establish~~
110 ~~environmental impacts and mitigation measures for the medium and long term which could~~
111 ~~include installation of safety barriers, junction improvements and road widening or capacity~~
112 ~~improvements.~~

113 The Authority acknowledges that changes to the Acle Straight could bring benefits in relation to
114 road safety, improved management of surface water and pollutants, and the economy of the local
115 area in particular economic growth of the sub-region of Great Yarmouth and Lowestoft and wider
116 region² through reduced congestion and delays and more reliable journey times. There are also
117 opportunities associated with schemes as mentioned in the policy, such as the potential for
118 archaeological finds, a new route alongside a dualled road, and potential for interpretation of the
119 Broads.

120 **Determining applications relating to the Acle Straight**

121 The Broads Authority would not determine any future planning application for dualling the Acle
122 Straight. The scheme is likely to be determined as a Nationally Significant Infrastructure Project
123 (NSIP) by the Planning Inspectorate, because the developable area could be over 12.5Ha and
124 because the scheme could have environmental impacts³.

125 There is a possibility that the dualling of the Acle Straight will come forward during this Local Plan
126 period and the purpose of this policy is to identify important issues and considerations in
127 determining the suitability of any proposal.

128 **Major Development**

² A47 Wider Economic Benefits (2012) www.a47alliance.co.uk/assets/AgendasMinutes/Wider-Economic-Benefits-A47.pdf
[Why does the A47 need dualling? \(a47alliance.co.uk\)](http://www.a47alliance.co.uk)

³ NSIP: www.legislation.gov.uk/uksi/2013/1883/pdfs/uksi_20131883_en.pdf

129 Some changes to the Acle Straight may be considered as Major Development for the purposes of
130 the ~~2019~~ 2023 NPPF paragraphs ~~172 and 173 (and footnote 55)~~ 176 and 177 (and footnote 60) and
131 **policy DM1** of this Local Plan which addresses major development in the Broads.

132 **The Acle Straight and the Broads**

133 The first statutory purpose of the Broads Authority is conserving and enhancing the natural beauty,
134 wildlife and cultural heritage of the Broads. Section 17A of The Norfolk and Suffolk Broads Act 1988
135 imposes a statutory duty on authorities to ~~have regard to~~ seek to further the relevant statutory
136 purposes when exercising their functions that can affect land in the Broads. For the avoidance of
137 doubt, the special characteristics of the Broads are those set out at **section 7.4**. Furthermore, of
138 particular importance and relevance in understanding the impacts of any scheme are the Broads
139 Landscape Sensitivity Study and Broads Landscape Character Assessment. Areas 19, 24, 25 and 20
140 of these studies are the relevant areas for consideration.

141 The Authority acknowledges that schemes will be designed to national guidance and requirements;
142 the policy and the following information highlights and explains locally important criteria that need
143 addressing in any scheme. It is considered that the clear guidance the policy and supporting text
144 provides will assist in the development and design of any future scheme.

145 Fundamentally, because of the potential adverse impacts that changes to the highway
146 schemes/changes to the Acle Straight may have on the landscape, visual amenity, historic
147 environment, ecology, habitats, access and special characteristics of the Broads, of either a
148 temporary or permanent nature, any changes to the Acle Straight will need to be designed to
149 reduce and avoid such impacts in the first place. Only then can mitigation be considered. These
150 specific criteria need to be considered and addressed as part of any scheme.

151 **Wildlife and habitats**

152 The Broads is one of the nation's richest areas for biodiversity, with European designated habitats
153 and species flanking and occupying the habitats close to the existing road. European and nationally
154 protected species such as water vole, bat and otter are likely to be impacted by any changes.
155 Water voles have suffered drastic declines across the country in recent years, although populations
156 in the Broads are still high. Any loss of water vole habitat in the ditches would need to be
157 compensated and water vole populations translocated.

158 Any increase in lighting could potentially cause adverse impacts on bat populations in the area.
159 Light pollution is known to deter bats from commuting and foraging areas, delay their emergence
160 for hunting and cause disturbance to roosts.

161 The area is already a significant site for otter mortality. Road widening risks making this worse, so
162 the Authority would expect changes that underline the need to include enhancements, such as
163 wildlife crossing points. Other impacts on wildlife, such as increased barn owl road fatalities, would
164 also need to be addressed.

165 Many of the grazing marsh ditches hold conservation designations of European importance,
166 supporting important plant and invertebrate communities. Any impacts to the ditch network would
167 need to address this loss, considering alternatives, mitigation (including translocation),
168 compensation, long-term conservation and monitoring.

169 One of the already specified issues that changes to the Acle Straight would need to address is the
170 Little Whirlpool Ramshorn Snail. The dykes around the current road are one of the few habitats of
171 this species, which is on an international 'red list' of endangered species. It is a small aquatic snail
172 with a flattened spiral shell of approximately 5mm in diameter. It has been declining from the UK
173 since the 1960s, although the reason for the decline is not clear. A study investigating the potential
174 to translocate the snail (AECOM, March 2015) concluded that translocation was a potential option,
175 but identified various considerations such as:

- 176 • Pathogen transference has been highlighted as an issue, and as such receptor and donor sites
177 should derive from the same drainage unit.
- 178 • Donor sites must have a robust population and only sites with no current population should be
179 used as receptor site.
- 180 • In order to ascertain these sites and to increase knowledge of the target species, robust
181 pre-translocation survey is a necessity.
- 182 • In addition, receptor sites will need to be properly assessed to ensure the receiving habitat is
183 suitable.

184 Large-scale changes such as dualling the Acle Straight are likely to result in the loss of habitat, as
185 the surrounding dykes could be lost, as could some marshland. The Authority would expect any loss
186 to be avoided and then minimised, with compensation likely to be required. Areas requiring
187 compensation include the need to secure land purchase, conservation management or long-term
188 covenants for defined enhancements, and monitoring regimes. In the first place a scoring system
189 for compensation should be worked up by independent consultant and agreed by all parties.

190 **Landscape and tranquillity**

191 Another key issue is the impact of changes to the road on the landscape character of the Halvergate
192 [Marshes](#) Conservation Area. The A47 crosses an area known as the Halvergate marshes or
193 Halvergate triangle. This area forms one of the defining landscapes of the Broads Authority
194 Executive Area, being a vast panoramic expanse of grazing marsh dotted with windmills and often
195 teaming with wildlife. The sheer scale, inaccessibility and emptiness of much of the marshland
196 means it remains largely quiet and isolated. It is designated as a Conservation Area and its
197 biodiversity interest is recognised through national and international designations. The dualling of
198 the Acle Straight has the potential to cause significant adverse effects to both the existing
199 landscape character of the area (including tranquillity through increased traffic noise) and nature
200 conservation interests.

201 Notwithstanding the above, it is recognised that the current use of the road, which is often
202 characterised by congestion, does not always positively contribute to a sense of tranquillity in the
203 area and improvements to the road which better facilitate the movement of traffic could
204 potentially result in benefits to tranquillity in the area.

205 Proposed highway options are likely to range in scale, nature and extent. A number of key
206 characteristics have the potential to be affected through changes to the highway/schemes, through
207 both the construction phase and as a result of the completed project. The significance of the effects
208 on the landscape and visual amenity of the area (adverse or beneficial) of any option proposed will
209 need to be assessed in accordance with current guidelines. Reference will need to be made to the
210 current landscape character assessments for Local Character Areas 19, 24, 25 and 20 and the
211 Conservation Area appraisal.

212 Dualling of the Acle Straight has the potential to cause significant adverse effects on the existing
213 landscape character. Mitigation of these effects may be challenging and would need to recognise
214 that common methods such as screening tree belts may be highly intrusive in terms of the
215 extensive open landscape character.

216 Noise is an important aspect of tranquillity. Schemes should seek to address this, but the provision
217 of noise barriers would be detrimental to the iconic landscape viewing potential along this route.
218 There could be scope for low noise surfacing.

219 **Surface water**

220 Changes to the Acle Straight could result in more impermeable surfaces, leading to a greater
221 volume of surface run off to wash more pollutants off the road surface. The sensitive habitats
222 nearby could be adversely affected by pollutants.

223 Any changes to the Acle Straight would need to address increased risk of flooding at that point and
224 elsewhere by implementing sustainable drainage or SuDS, and by considering potential hazard to
225 water quality from the surface runoff. Water may require additional treatment prior to disposal and
226 adequate steps need to be put in place. Where any SuDS are proposed, it is important to
227 demonstrate that the SuDS hierarchy (see policy DM6) has been followed both in terms of:

- 228 • Surface water disposal location, prioritised in the following order: disposal of water to shallow
229 infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration
230 (generally greater than 2m below ground level); and
- 231 • The SuDS components used within the management train (source, site and regional control).

232 The CIRIA SuDS Manual C753 (2015) looks at designing sustainable surface water drainage from
233 highways, and designing for water quality issues. Additional measures to address accidental spills
234 will also need to be considered.

235 The Acle Straight is almost entirely within an Internal Drainage Board (IDB) area and the Water
236 Management Alliance should be consulted at an early stage. If infiltration is not favourable, they
237 should be consulted to establish if surface water drainage discharge to a managed network would
238 require consent.

239 The Environment Agency should also be consulted with regard to water quality and any particularly
240 sensitive receptors nearby as well as in relation to strategic flood risk and any mitigation required
241 to compensate for any floodplain affected. The Environmental Permitting (England and Wales)
242 Regulations 2010 may be of relevance as well.

243 **Light pollution**

244 The Authority's Dark Sky Report (2016) shows that the Acle Straight has good quality dark skies,
245 with the western end in particular having very good quality dark skies⁴. Any schemes need to be
246 assessed in line with **policy DM22 Light pollution and dark skies.**

247 **Walkers, cyclists and horse riders**

⁴ The readings taken along the Acle Straight were all over 20 arc magnitudes per second with those to the western end of the Acle Straight in particular being over 20.5 arc magnitudes per second.

248 Changes to the Acle Straight offer the opportunity to improve provision for walkers, cyclists and
249 horse riders and provide new facilities. The Broads Integrated Access Strategy has an aim for a
250 shared use path along the length of the Acle Straight, which would provide a new link to enable
251 non-car journeys between Acle and Great Yarmouth.

252 **Interpretation and appreciation**

253 The route is a tourist route as well an access route. Changes to the Acle Straight could include
254 provision of parking laybys, allowing people the opportunity to appreciate the iconic landscape. The
255 Authority would expect these areas to have no impediment to the view, and to provide
256 interpretation points that would add to the visitor experience of the Broads.

257 **~~HLF scheme⁵~~**

258 ~~The Broads Landscape Partnership has received a grant of £2.6m from the Heritage Lottery Fund~~
259 ~~(HLF) through its Landscape Partnership (LP) programme for the Water, Mills and Marshes project.~~
260 ~~The project aims to enrich and promote heritage sites in the area between Norwich, Great~~
261 ~~Yarmouth, Lowestoft, Acle and Loddon, unlock the benefits of this distinctive landscape for local~~
262 ~~people and give them the skills to protect it as a legacy for future generations. Iconic drainage mills~~
263 ~~on Halvergate marshes, an area which boasts one of the greatest concentrations in Europe, will be~~
264 ~~documented and renovated through a Heritage Construction Skills training scheme.~~

265 ~~Delivery of the HLF project is set for 2018 to 2022. At the time of writing, the results of the scheme~~
266 ~~and their impact on the landscape in the Halvergate Marshes area is not known. The changes to the~~
267 ~~area will be an important consideration for any proposals to change the Acle Straight.~~

268 **Heritage assets**

269 The listed Stracey Arms Drainage Mill is located immediately adjacent to the Acle Straight. The
270 impacts of changes on this heritage asset will need to be addressed. There are many other
271 intervisible (seen from each perspective) drainage mill structures, both nationally and locally listed,
272 collectively forming the largest grouping in the UK. All of them contribute to the historic character
273 of the drained marshland. The Norfolk HER contains many records relating to the area both in
274 terms of archaeology and built form, an example being the World War 2 defences that remain in
275 situ on the marshes.

276 The special historic interest of Halvergate marshes is particularly significant as a constantly evolving
277 cultural landscape. That evolution is illustrated by numerous remnant structures, landscape and
278 archaeological features, that collectively contribute to the historic significance of the area. Historic
279 England has recognised this significance in terms of undiscovered archaeology and identified the
280 Broads as an area of *exceptional potential for waterlogged heritage*. See policy DM11 Heritage
281 Assets, which relates to archaeology.

282 Virtually the whole of the Acle Straight corridor lies within the Halvergate Marshes Conservation
283 Area, a designated Heritage Asset characterised by the cultural landscape and the features within it.
284 [A partnership project sponsored by the Heritage Lottery Fund has made a significant investment in](#)
285 [works to restore the mills in the area and thereby enhanced the landscape.](#)

⁵ Water, Mills and Marshes: www.broads-authority.gov.uk/looking-after/projects/water,-mills-and-marshes

286 The Authority would expect that the historic significance, including the potential archaeological
 287 significance of the area, is fully assessed and analysed in any proposal for changes to the Acle
 288 Straight. The historic environment is a finite resource and once lost cannot be replaced. The
 289 Authority therefore expects that any adverse impact on the historic environment, either built,
 290 landscape or archaeological, is kept to an absolute minimum, and that any adverse impact resulting
 291 from change is fully assessed and can be justified in line with the tests set out in section 16 of the
 292 2019 NPPF. Where justification for harm can be made, any impact or harm should be mitigated,
 293 including improvements to existing features.

294 **Practicalities**

295 The current route has various pinch points bounded by river on one side and railway on the other.
 296 Further, numerous farm accesses and the road towards Halvergate will need to be accommodated.
 297 This may mean that any scheme cannot be fitted ‘on-line’ and a wider route choice corridor has to
 298 be considered. This could have immense implications on the landscape, heritage and ecology and
 299 could alter the attitude of the Authority to any proposals. Constraint scoping needs to be
 300 undertaken very early in the process.

301 **Reasonable alternative options**

- 302 a) No policy
- 303 b) The original policy, with no amendments.

304 **Sustainability appraisal summary**

305 The three options (of the amended policy, the original policy and no policy) have been assessed in
 306 the SA. The following is a summary.

A: No policy	0 positives. 0 negatives. 9 ?
B: Keep original policy	8 positives. 0 negatives. 0 ? Overall, positive.
C: Preferred Option - amend policy.	9 positives. 0 negatives. 0 ? Overall, positive.

307 **How has the existing policy been used since adoption in May 2019?**

308 According to recent Annual Monitoring Reports, the policy has not been used.

309 **Why has the alternative option been discounted?**

310 The amended policy is preferred because it provides clarification and emphasises the properties
 311 and importance of peat.

312 **UN Sustainable Development Goals check**

313 This policy meets these [UN SD Goals](#):

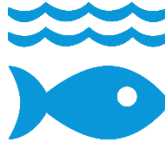
6 CLEAN WATER
AND SANITATION



13 CLIMATE
ACTION



14 LIFE
BELOW WATER



15 LIFE
ON LAND



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

		A: No policy	B: Keep original policy	C: Preferred Option - amend policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy refers to the A47.	+ Policy refers to the A47.
ENV2	?		+ Policy emphasises the issue of water quality.	+ Policy emphasises the issue of water quality.
ENV3	?		+ Policy emphasises the issue of impact on biodiversity.	+ Policy emphasises the issue of impact on biodiversity. Also raises issue of peat.
ENV4	?		+ Policy emphasises the issue of impact on landscape.	+ Policy emphasises the issue of impact on landscape.
ENV5	?			+ Policy refers to climate change resilience.
ENV6	?		+ Policy emphasises issue of flood risk.	+ Policy emphasises issue of flood risk.
ENV7				
ENV8				
ENV9	?		+ Policy emphasises issue of impact on heritage.	+ Policy emphasises issue of impact on heritage.
ENV10	?		+ Taken as a whole, the aim of the policy is for a well designed scheme.	+ Taken as a whole, the aim of the policy is for a well designed scheme.
ENV11	?		+ Light pollution is referred to in the policy.	+ Light pollution is referred to in the policy.
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
February 2024**

Fibre to the Premises

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. There is an assessment against the UN Sustainable Development Goals at the end of the policy. The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

1 **Policy PODMXX Fibre to the Premises**

- 2 1. Prior to first occupation/use, all new dwellings, and all new commercial proposals of
3 100sqm or over shall be provided with fibre connections to an approved industry standard
4 within the dwelling/building together with suitable ducting/cabling to the public highway to
5 allow connections to be made.
- 6 2. Where it can be demonstrated¹ that FTTP is not cost effective, then alternative
7 technological options, for example Superfast Fibre to the Cabinet or Fixed Wireless Access,
8 should be provided. For such schemes provision in the form of ducting and other necessary
9 infrastructure for the future delivery of FTTP should be provided.

10 **Reasoned Justification**

11 The purpose of this policy is to improve the provision and quality of digital communications
12 including broadband across the Broads and to ensure that all new dwellings and workplaces
13 are connected by fibre, or are able to be connected in the future. This policy applies to both
14 new build proposals and those seeking the change of use of existing buildings.

15 High quality digital infrastructure is crucial to the success of businesses and also plays a vital
16 role in enhancing the provision of local community facilities, services, and employment.
17 Well-connected places attract modern businesses and can create the conditions for new
18 clusters of digital and creative businesses to emerge. Access to high quality digital
19 infrastructure can also facilitate social inclusion, enable home working, diversify the rural
20 economy, enhance educational and social opportunities, as well as improve access to a wide
21 range of services that are increasingly provided online. Consequently, high quality digital

¹ The Authority will require applicants to demonstrate evidence of discussions with service providers and documentary evidence in relation to the cost effectiveness of providing connections via the submission of a Digital Infrastructure Delivery Plan.

22 infrastructure will make a significant contribution towards the delivery of sustainable
23 development.

24 New development should ensure that it has considered any need and demand resulting
25 from the development and taken proactive steps in engaging with service and infrastructure
26 providers to ensure that there is high-speed fibre broadband connectivity or mobile internet
27 coverage in the development.

28 Proposals should be supported by a proportionate Digital Infrastructure Connectivity
29 Plan/Statement demonstrating that digital infrastructure has been planned for as part of
30 development proposals. This should provide evidence that developers have engaged with
31 infrastructure and service providers to ascertain fibre connectivity and mobile internet
32 coverage for the site and provide evidence that an agreement to connect to the
33 development site to the fibre broadband network has been secured, and details on how the
34 physical infrastructure on site is capable of supporting gigabit-capable networks. Where
35 there are deficiencies in mobile coverage, development proposals must provide information
36 on how the coverage is to be improved if practicable.

37 **Reasonable alternative options**

38 a) No specific policy.

39 **Sustainability appraisal summary**

40 The following is a summary of the assessment of the policy.

A: Preferred Option – policy on fibre to the premises	3 positives. 0 negatives. 0 ?
B: No specific policy.	0 positives. 0 negatives. 3 ?

41 **How has the existing policy been used since adoption in May 2019?**

42 This is a new policy.

43 **Why have the alternative options been discounted?**

44 Given that access to high quality digital infrastructure can also facilitate social inclusion,
45 enable home working, diversify the rural economy, enhance educational and social
46 opportunities, as well as improve access to a wide range of services that are increasingly
47 provided online, it is felt a policy is prudent.

48 **UN Sustainable Development Goals check**

49 This policy meets these [UN SD Goals](#):

11 SUSTAINABLE CITIES
AND COMMUNITIES



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

	A: Preferred Option – policy on fibre to the premises	B: No specific policy.
ENV1		
ENV2		
ENV3		
ENV4		
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10	+ Considering fibre to the premises as part of the design will bring benefits.	?
ENV11		
ENV12		
SOC1		
SOC2	+ One of the benefits of the policy will be through digital inclusivity.	?
SOC3		
SOC4		
SOC5		
SOC6		
SOC7		
ECO1	+ Well-connected places attract modern businesses and can create the conditions for new clusters of digital and creative businesses to emerge.	?
ECO2		
ECO3		

Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
February 2024**

Utilities Site, Norwich

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy PONOR1: Utilities Site

Policy Map 12 and inset map 12.-NORWICH-POLICY.pdf (broads-authority.gov.uk)

1. Redevelopment of this area will be sought to realise its potential contribution to the strategic needs of the wider Norwich area. The site is allocated for mixed-use development which could include around ~~120~~ 271 dwellings.
2. Redevelopment proposals will only be supported where they are in conformity with the East Norwich Regeneration Area SPD (to be completed) and where they:
 - a) Do not prejudice but contribute to a comprehensive and deliverable mixed-use scheme for the whole of the Deal Ground/Carrow Works/May Gurney/Utilities Sites Core Area (including those parts outside the Broads Authority Executive Area boundary) known collectively as the East Norwich Regeneration Area;
 - b) Protect and enhance natural assets and the historic environment and setting of heritage assets;
 - c) Provide a high-quality local environment through high quality design and landscaping (see design policy and design guide);
 - d) Balance scale and massing of development, having regard to its location on the urban/rural fringe, and make a positive contribution to the views between the river and the site;
 - e) Do not impede ~~the Norwich~~ navigation;~~of the Rivers Yare and Wensum~~;
 - f) Provide evidence, including a site flood risk assessment, to confirm that any development will be consistent with national and local policy in terms of both on-site and off-site flood risks;

- g) Provide a suitable and appropriate solution to the constrained access to the site for all modes of transport including the wheeling, pedestrian and cycle links through the site and linking to the wider network;
 - h) Provide public access to the length of the Yare riverfront (see policy PONOR2);
 - i) Are energy and water efficient;
 - j) Identify, and provides remediation of, any existing ground contamination;
 - k) Addresses amenity impacts from nearby existing land uses.
 - l) Be resilient to a changing climate, particularly through providing shade and addressing surface water from intense rain bursts;
 - m) Ensures any lighting meets the requirements of the light pollution policy (DMxx) to reflect the riverside location;
 - n) Manage any risk of pollution of groundwater or river water arising from the proposed uses; and
 - o) Make appropriate use of the safeguarded sand and gravel resources on the site where practicable (see Norfolk County Council's Core Strategy Policy CS16 - Safeguarding mineral and waste sites and mineral resources).
- ~~3. The provision of serviced self build/custom build plots is encouraged.~~ As part of the scheme, the Authority expects a certain number of plots to be provided for self build/custom build housing if this is viable and feasible in terms of the overall scheme. The precise number of plots will be discussed and agreed as part of the planning application process.
4. Project Level Habitats Regulation Assessments will be required to ensure no adverse impacts upon any habitat site ~~needed to assess implications on sensitive European Sites~~. Measures to mitigate for the effects of new growth may will be required, ~~such as the provision of good quality on-site green infrastructure~~ to mitigate for recreational disturbance and nutrient enrichment.
5. The Authority will also expect the following to be delivered as part of the overall scheme, unless it is demonstrated this cannot practically be achieved:
- i) Improved opportunities for recreation on site;
 - ii) Improved facilities for recreational boating on the river frontage; and
 - iii) A pedestrian/cycle link across the Wensum and Yare between the City Centre and Whitlingham Country Park. A proportionate developer contribution will be required to address any increased demand on services and facilities in Whitlingham Country Park arising from the creation of this link.
6. Applicants are encouraged to take the opportunity of using the proximity of the site to the river to use water source heat pumps or use the river for water source district heating.

Constraints and features

- Close to Norfolk County Wildlife Site – Cary’s Meadow.
- Likely to be of archaeological interest. Contains a range of heritage assets, including evidence for Roman settlement, a possible Roman wharf, and possible World War Two features and structures. Potential for archaeological remains associated with the use of the adjacent River Yare.
- Norwich navigation
- Flood risk - zone 2 by EA mapping and small parts in zone 2, 3a and modelled 3b by SFRA 2017 mapping. When EA climate change allowance of 65% added, site is affected.

- Contributes to the urban/rural transition.
- Semi natural habitat on the edge of Norwich.
- Future growth could have an impact on the foul sewerage network capacity.
- Access to the site is particularly constrained for all modes of transport.
- This site is in close proximity to a number of designated heritage assets including the Grade II listed Ruins of Trowse Newton Hall, the Thorpe Ridge Conservation Area and the Grade II listed Registered Park and Garden (RPAG) of Crown Point.
- Safeguarded sand and gravel resources

Reasoned Justification

The site sits to the East of Norwich, yet on the urban rural fringe. In this area there is much brownfield redundant land that Norwich City Council and Norfolk County Council (in liaison with Broadland District Council, South Norfolk District Council and the Broads Authority) are keen to see redeveloped and realise their potential. The Utilities site is part of a much wider area of industrial land, now largely redundant, stretching across the planning boundaries of the Broads Authority, Norwich City Council and South Norfolk District Council. Over the river, to the south west, is the 'Deal Ground' site which has extant outline planning consent for a mixed use development including 670 dwellings, a local centre, restaurant/dining quarter, flood risk management and landscape measures, a new access road, and an access bridge over the river Yare. To the West of the Deal Ground is the Carrow Works which ~~is currently was~~ occupied by Britvic/Unilever but which ~~is likely to~~ has become vacant ~~early on in the plan period and may have~~ and has potential for redevelopment. The May Gurney site sits to the south of the Deal Ground site. This wider area is seen as having strategic development potential, but bringing development forward is complicated by access problems and the number of different landowners. The Joint Core Strategy (adopted 2011 with amendments 2014) identifies the East Norwich area as having major physical regeneration opportunities for mixed-use development and enhanced green linkages from the city centre to the Broads. The Greater Norwich Local Plan is being produced and ~~could potentially allocate~~ allocates land at the Utilities Site, Deal Ground, May Gurney and Britvic/Unilever site and those policies will be of great relevance to any scheme that comes forward on the Utilities Site. Indeed the Norwich City Council Site Allocations and Site Specific Policies Plan (adopted December 2014) has the following policies currently in place: R9: The Deal Ground, Trowse (residential led mixed-use development) and R10: Utilities Site, Cremorne Lane (mixed-use development).



The wording for this policy reflects, but simplifies and adds to, the content of the East Norwich Joint Statement produced by Norwich City Council in association with the Broads Authority and South Norfolk District Council. It also reflects the East Norwich Masterplan¹ and emerging East Norwich SPD. It is anticipated that the SPD, that will be adopted by Norwich City Council, Broadland Council and South Norfolk Council as well as the Broads Authority, will be adopted in 2024.

The access constraints referred to in the policy reflects that the site is bounded by railway lines and a river. Whilst there are two ways to get to the site, the bridge over the railway to Cremorne Lane is not designed to cater for traffic that could arise from the redevelopment of this site and the access that runs alongside the river uses a tunnel under the railway bridge which again is not designed to cater for more traffic. The likely solution would be the provision of a bridge over the river that would connect the Utilities Site (in its entirety, not just the part within the Broads) to the Deal Ground site. The solution will need to take account of the navigation of the rivers Wensum and Yare, and Norwich navigation, as defined in The Norfolk and Suffolk Broads Act 1988.

The Environment Agency:

- supports the reference to the need to address flood risk issues, and highlights the need for Flood Defence Consent from the Agency for development and trees in proximity to the river;
- highlights the importance of protection against water pollution, that the site lies over groundwater resources and within Source Protection Zone 1, and the potential risks of water pollution from waterside sites in any industrial/boatyard uses; and
- draws attention to the potential of contaminated land.

Norfolk County Council identifies that the site includes a safeguarded minerals (sand and gravel) resource.

There ~~may will~~ be a requirement for an evidence based, project level HRA to assess the impact of this development on European Protected sites. Mitigation measures will be required relating to recreation impact and nutrient enrichment – see the Natural Environment section for details. ~~could be required, such as adequate daily recreation and dog walking facilities to meet need.~~

There ~~may be~~ is potential for serviced plots to be provided for people to build their own homes as part of any residential element of the scheme. See self build policy.

It is anticipated that the dwellings will be delivered after 2035, towards the end of the plan period 2030. The Authority and partners consider that the site could potentially accommodate ~~120~~ 271 dwellings. **Please note that this site does not appear in the trajectory because the SPD is being produced at the time of writing; the final Local Plan will reflect the SPD.**

In relation to the potential new link to Whitlingham Country Park, there could be more use of the park by residents living at the Utilities Site. The Authority appreciates that this link would make the Park more directly accessible to more visitors and that it benefits the wider existing community in the area, not just the residents of the Utilities Site. As such, an assessment of the increased number of visitors likely to visit the Park from the Utilities Site development will be needed. This will then determine the developer contribution required to enable the park to accommodate the additional

¹ [East Norwich Masterplan | Norwich City Council](#)

visitors and demand on the services and facilities. The developer contributions sought would only reflect the visitors arising from Utilities Site development.

In terms of lighting, whilst it is acknowledged that the site is in Norwich, it is near a river corridor and these areas are foraging areas for bats and so lighting needs to be well designed, if required.

Reasonable alternative options

- a) Original policy
- b) No policy

Sustainability appraisal summary

The options of no policy, the original policy and having a policy have been assessed in the SA. The following is a summary.

A: Original	10 positives. 0 negatives. 0 ? 3+/? Overall, positive.
B: No policy	0 positives. 0 negatives. 13 ? 3+/?
C: Preferred Policy	13 positives. 0 negatives. 0 ? 3+/? Overall, positive.

Why has the alternative option been discounted?

Considering the potential this site has and its role as part of the wider East Norwich Regeneration Area, it is prudent to allocate it. Indeed, this is supported by the HELAA. The changes are favoured as they add greater detail and clarity around requirements as well as opportunities the site offers.

UN Sustainable Development Goals check

This policy meets these [UN SD Goals](#):



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

		A: Original policy		B: No policy		C: Preferred Policy	
ENV1	+	Access is a key consideration for this site and the wider area.	?	Not having a policy does not necessarily mean these issues will not be considered. But a policy brings the important considerations together for clarity and consistency.	+	Access is a key consideration for this site and the wider area.	
ENV2	+	Policy refers to water efficiency and quality.	?		+	Policy refers to water efficiency and quality.	
ENV3	+	Policy refers to natural environment.	?		+	Policy refers to natural environment.	
ENV4	+	Policy refers to landscaping and the character of the area.	?		+	Policy refers to landscaping and the character of the area.	
ENV5			?		+	Policy refers to any proposal being resilient to a changing climate.	
ENV6	+	Policy refers to flood risk.	?		+	Policy refers to flood risk.	
ENV7	+	Site is a brownfield site.	?		+	Site is a brownfield site.	
ENV8							
ENV9	+	Policy refers to heritage in the area.	?		+	Policy refers to heritage in the area.	
ENV10	+	Policy seeks high quality design.	?		+	Policy seeks high quality design.	
ENV11			?		+	Policy refers to lighting and light pollution.	
ENV12			?		+	Policy encourages water source heating.	
SOC1							
SOC2							
SOC3							
SOC4	+	The site could deliver 270 homes.	?		+	The site could deliver 270 homes. Policy refers to self-build as well.	
SOC5							
SOC6	+	The site is located with good access to services and facilities and the policy refers to links for pedestrians and cyclists.	?		+	The site is located with good access to services and facilities and the policy refers to links for pedestrians and cyclists.	
SOC7							
ECO1	?/+	Whilst the policy is mainly about the housing element, this site is part of a larger area and therefore taken together, could rate positive against these economic objectives.	?		?/+	Whilst the policy is mainly about the housing element, this site is part of a larger area and therefore taken together, could rate positive against these economic objectives.	
ECO2	?/+		?	?/+			
ECO3	?/+		?	?/+			



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Your part of the Broads – update

Introduction

As part of the Issues and Options consultation, we asked local communities a few questions about their area.

Section of the Issues and Options

There are only parts of parishes and settlements in the Broads Authority Executive Area – all are shared for planning purposes between the Broads Authority and the relevant district. However, we would like to know what makes your village or town a good place to live, and what we need to do to protect or improve it. There are some questions below for you to consider. We cannot guarantee that we can enable sites to be developed, or can address all your concerns or suggestions, but we would welcome your thoughts.

Question 5: What do you think of your part of the Broads?

- a) What aspects of your town, village or parish or part of the Broads are particularly important and valued by residents?
- b) Are there any features or areas in your part of the Broads that you would like to see altered or improved?
- c) Are there any other issues that affect your community/your part of the Broads that you would like to be considered in the preparation of the new Local Plan?
- d) What changes do you expect to see over the next twenty years in your part of the Broads that the Local Plan may need to cater for?
- e) Are there any areas of previously developed land that are currently unused within the Broads' part of your town or village? If so, please identify the location and tell us what your preferences would be for these areas in the future.
- f) What kind of development, if any, do you think your part of the Broads would benefit from?

Comments received

Q	Organisation	Comment	Response	Next steps
5	Anglian Water	<p>3.17. Anglian Water is the statutory sewerage undertaker for the Broads, and the statutory water provider for part of the Broads. We therefore have a network of assets throughout the Executive Area which we maintain and invest in improvements where necessary. Our Drainage and Wastewater Management Plan (DWMP) is in preparation with a view to publish by the end of May 2023 and highlights the known and expected future risks to drainage and identifies solution strategies to mitigate these. In addition, we are also preparing our Water Resources Management Plan (WRMP24) which will be available for consultation soon – and will set out how we intend to achieve a secure supply of water for our customers whilst protecting and enhancing the environment from 2025 to 2050. The WRMP24 will align with the draft Water Resources East Regional Water Resources Plan which addresses the future needs and aspirations for water across all sectors – this is currently open for consultation.</p> <p>3.18. Both the DWMP and WRMP set out a long-term vision for future management and investment of our assets and will inform our Price Review (PR24) and our Long-Term Delivery Strategy.</p> <p>3.19. We agree that the Local Plan should focus on previously developed land where it is not vulnerable to flood risk and existing infrastructure can be utilised.</p>	Support noted.	No further action.
5	Designing Out Crime Officer, Norfolk Police	Option F) What kind of development, if any do you think your part of the Broads would benefit from Norfolk Constabulary request that as a condition of planning and to support partnership working for any new developments that they are in line SBD standards and guidelines to ensure that the Broads towns and villages remain safe and do not see an increase of crime and disorder due to poor design.	Noted. This is more for design policy.	Ensure design policy refers to SBD standards and guidelines.
5	East Suffolk Council	East Suffolk Council have provided some analysis of most relevant areas in response to question 40 below. Other points have been picked up under other responses as appropriate.	Noted.	No further action.
5	RSPB	<p>c) Are there any other issues that affect your community/your part of the Broads that you would like to be considered in the preparation of the new Local Plan?</p> <p>Recognition that the Broads is a sink for many unwanted adverse inputs e.g., pollutants, nutrients etc., which originate outside the area. Thus, a tightly joined up approach is essential to ensure down-stream or down- contour isn't affected by adverse inputs brought into the Broads by gravity.</p>	Noted. We do work on a catchment basis. Indeed, Nutrient Neutrality is a key aspect of the comment.	Continue partnership working.
5	RSPB	<p>d) What changes do you expect to see over the next twenty years in your part of the Broads that the Local Plan may need to cater for?</p> <p>As a result of climate change the water resource and its availability will change. To make wise use of this commodity we need to encourage users to save and not waste and be respectful of this precious asset.</p>	Agreed. We asked about future development and water use in this consultation document.	See responses to water use questions.
5	RSPB	<p>f) What kind of development, if any, do you think your part of the Broads would benefit from?</p> <p>Green infrastructure to promote access to specific parts of the Broads, nominally referred to as honey pot sites, thereby focusing visitor pressure to allow retention of other, remote places where very few or no visitors go to, and a sense of remoteness and wilderness is maintained.</p>	Noted and there is a role for the Broads Plan, Integrated Access Strategy and Sustainable Tourism Strategy in addressing this.	Share comment with other officers at the Broads Authority.
5	Sequence UK LTD/Brundall Riverside Estate Association	<p>2.11 The Brundall Riverside Estate Association does not wish to comment in detail in response to this question and some of the matters raised are covered in more detail in response to other questions.</p> <p>2.12 As set out above, the Riverside Estate comprises boatyards, marinas and other businesses and a number of private residential and holiday homes. It is a relatively large mix of businesses and residential/holiday use, directly adjacent to the current settlement limit for Brundall and a sustainable location, particularly in relation to Brundall railway station. Therefore, as set out in our response below, the Association would consider that this should be recognised by inclusion within a development boundary.</p> <p>2.13 The nature of the estate continues to evolve, particularly challenges to the more traditional boatyard and marina uses and therefore the Local Plan, and draft Design Guide should be flexible and allow for appropriate change and diversification, not being overly-prescriptive as it is difficult to predict for 20 years in advance.</p> <p>2.14 The Brundall Riverside Estate Association would also make the point that recent developments and the extension or replacement of chalets with more modern construction has been a positive, in particular this has rejuvenated some more tired looking plots and this has had a knock-on effect of greater pride in the location and further enhancements such as roads, boundary treatments and planting/landscaping, as well as further investment.</p>	Noted. The Brundall Riverside Estate area has policies addressing various parts of the area and these will be checked, amended if needed and rolled forward.	Liaise with Sequence when looking at the Brundall policies.
5	Upton Parish Council	a) the area of the Broads within the boundaries of Upton is much valued. The area of open space is mostly managed by the Norfolk Wildlife Trust and the Environment Agency. The space to walk and sit quietly is appreciated, and the opportunities to see wildlife and flora.	Noted. Good to hear how the Broads is much valued by the local community.	No further action.

Q	Organisation	Comment	Response	Next steps
5	Upton Parish Council	b) the cutting of footpaths in the area is not frequent enough. Some become almost impassable by mid summer. There seems to be cutting of access to fishing platforms by the EA but very infrequent cutting for walkers.	<p>The following specific stretches of footpath in the Upton/Acle area are cut by the Broads Authority:</p> <ul style="list-style-type: none"> •III Acle Bridge to Upton on the south side of the river. •III Footpath along the south side of Upton Dyke. •III Acle Bridge to Acle. <p>Any issues relating to grass cutting along these stretches, please contact the Broads Authority via the website https://www.broads-authority.gov.uk/contact-us</p> <p>All other footpaths are cut by Norfolk County Council, as can be viewed via this link http://maps.norfolk.gov.uk/highways/</p> <p>Any issues on these paths, please use Norfolk County Council's reporting form https://www.norfolk.gov.uk/roads-and-transport/roads/report-a-problem#prowicons</p>	None
5	Upton Parish Council	c) Given that the BA receives tolls from boat users, it would seem fair that the BA should help with the cost of litter removal from the boat dyke car park and staithe. In the summer, people moor up and put bags of rubbish next to the litter bin that is provided by Broadland DC. There are clearly insufficient refuse collection points in the BA area.	The Broads Authority are not responsible for boat waste but the responsibility lies with the relevant local authorities within the Broads area.	None
5	Upton Parish Council	d) the BA needs to plan for increased numbers of tourists - refuse collection, parking and public toilets.	The Broads Authority are not responsible for boat waste but the responsibility lies with the relevant local authorities within the Broads area.	None
5	Wroxham Parish Council	a) "When asked what is special about Wroxham, residents repeatedly noted its waterside location and community spirit. The combination of setting, size and natural beauty, combine to make Wroxham a unique place to live. For more than 100 years Wroxham has been regarded as The Capital of The Norfolk Broads. It lies at the heart of the Broads National Park and has a range of housing in woodland and waterside settings. Adjacent to a thriving hub of tourism it nevertheless offers areas of tranquillity for those seeking a high quality of living." Wroxham Neighbourhood Plan (WNP).	Information noted.	Consider this comment as produce Preferred Options version of the Local Plan.
5	Wroxham Parish Council	b) The Council would like to see the former Windboats site on the Norwich Road developed into a residential development that provides housing for older people as permanent residences with attractive public spaces and a public right of way from Staithe Way Road to the Norwich Road. In addition, the Council would like the boundary along the Norwich Road with Bridge Broad to be improved. It is currently an unattractive dilapidated fence. The regular flooding in this area also needs to be addressed. Flooding often blocks the footpaths on either side of the Norwich Road adjacent to Bridge Broad and Norfolk Broad Direct and also at the entrance of Bridge Broad Close. Pedestrians, particularly those from the nearby sheltered housing complex, are often prevented from accessing the facilities over the bridge in Hoveton due to this flooding. The Parish Council have been in correspondence with Highways on the matter but have been told a scheme to raise the road is too expensive.	Noted and we will treat this as a suggested site to be considered.	Add to sites to look into for allocation.
5	Wroxham Parish Council	c) Housing for older people (WNP policy HBE5), new small retail outlets (BUS1), new businesses that diversify employment opportunities (BUS2), small scale sustainable tourist developments (BUS3), improvement in the public space around the Wroxham-Hoveton river bridge and the condition of the river bridge itself (COM1), improved community amenities especially space for leisure activities and pre-school provision (COM2), riverside/Broad public open spaces (COM3 & ENV1), a reduction in traffic congestion (TRA1), improved walking and cycling in particular the provision of a Green Loop providing a safe and pleasant walking and cycling route off the A1151 (TRA3).	Reference to Wroxham Neighbourhood Plan noted.	Consider all Neighbourhood Plans as produce the Preferred Options.
5	Wroxham Parish Council	d) Switch to electric vehicles and therefore a need for charging points both residential and public. An increase in extreme weather creating hot dry and then very wet periods which could be mitigated by an increase in trees and planting and flood ready infrastructure. Also better working practices by the BA to work together with the EA on water abstraction licencing to prevent the rivers running dry. An increase in traffic created by large developments on the A1151 at Rackheath and on the NDR at Salhouse etc.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.

Q	Organisation	Comment	Response	Next steps
5	Wroxham Parish Council	e) See point b.	Noted.	See point b
5	Wroxham Parish Council	f) See point c	Noted.	See point c
5a	Bradwell Parish Council	Parks and natural habitats such as Bluebell Woods. Community Centres and Recreation facilities.	Following further conversations, this site is not in the Broads Authority Executive Area. We have policies relating to community centres and recreation facilities.	No further action.
5b	Bradwell Parish Council	We would like to see the Bluebell Woods area improved to be more of a community recreational area.	Following further conversations, this site is not in the Broads Authority Executive Area.	No further action.
5c	Bradwell Parish Council	The poorly thought-out plan to imprison Bluebell woods, Bradwell in the middle of an industrial estate.	Following further conversations, this site is not in the Broads Authority Executive Area.	No further action.
5d	Bradwell Parish Council	Rising sea levels causing more localised flooding. More problems with drought type conditions.	Noted.	No further action.
5e	Bradwell Parish Council	None,	Noted.	No further action.
5f	Bradwell Parish Council	More open spaces and natural habitats for wild life.	Noted.	No further action.

Summary and way forward

Generally, comments can be weaved into other policies. There seems no requirement for specific additional policies. In terms of the sites put forward for us to consider, the landowner will need to put their site forward as part of the Call for Sites that will be run during the Preferred Options consultation.



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Embodied Carbon

Section of Issues and Options:

Construction methods and materials used.

Different materials have different embodied carbon; this makes some building materials more sustainable than others. The useful database on the embodied carbon of building materials sets out the embodied carbon of building materials. There is potential to require applicants to set out a schedule of materials used and calculate the embodied carbon, and state how they have chosen materials with less impact/embodied carbon. We would need to consider and balance any issues with design of new build.

Question 10: Do you have any thoughts on the approach of requiring applicants to choose materials that have less embodied carbon?

Comments received:

Bradwell Parish Council	Yes, we should strive for less embodied carbons.
RSPB	Sensible stance to take to drive the message home about importance of the approach.
Broads Society	The Society feels that this could have an adverse impact on the design quality of new build or replacements/extensions. Also it should be another element that could be usefully incorporated into Building Regulations legislation rather than Planning legislation if felt necessary.
Suffolk County Council	Suffolk County Council supports the approach of requiring applicants to choose materials that have less embodied carbon as a key element of achieving carbon neutrality by 2030. Assessments of embodied carbon should also include demolition of existing buildings.
Anglian Water	3.24. We support the approach relating to embedded carbon. Anglian Water’s Net Zero Strategy seeks to be net zero by 2030 and reduce capital (embedded) carbon by 70% from a 2010 baseline. This reinforces the need for sustainable, resilient development and supporting infrastructure to minimise carbon emissions and avoid future redundancies/abandonment.
Sequence UK LTD/Brundall Riverside Estate Association	2.28 The Issues and Options document picks up on the main challenge here which is the need to balance the use of materials with embodied carbon, with design constraints. In this context, there is the potential for conflict with the draft Design Guide and quite prescriptive materials preferences, which we in turn have concerns with, covered within Section 3 of this response.

	<p>2.29 Again noting the requirements of building regulations which already set a high standard for sustainable construction, we are concerned with the reference to ‘requiring’ applicants to choose materials that have less embodied carbon and would therefore recommend the use of the phrase ‘encourage’ rather than ‘require.’</p>
<p>East Suffolk Council</p>	<p>As the Broads Authority will be aware, there can be a significant time gap between a development receiving planning permission and work starting on site, and some larger developments can take years to complete. As such, developers may require a degree of flexibility to enable them to source alternatives when there are material shortages, supply chain delays, or changes in price. The RICS Whole life Carbon assessment for the built environment is recommended as an approach for identifying opportunities to reduce emissions over the course of a building’s lifetime. www.rics.org/globalassets/rics-website/media/news/whole-life-carbon-assessment-for-the--built-environment-november-2017.pdf The Construction Material Pyramid produced by the Centre for Industrialised Architecture is also a useful tool understanding the impact of different building materials and calculating the carbon emissions. www.materialepyramiden.dk</p>
<p>South Norfolk Council</p>	<p>As previously noted within the plan, there is existing legislation in place i.e., Building Regulations which covers energy design of new buildings and the requirement of EV charging points. On this basis, the Council has some reservations about the appropriateness of included a separate planning policy requiring the use of less embodied carbon materials. In addition, it is unclear what the implications of that assessment would be in terms of determining application i.e. is a minimum threshold proposed? Careful consideration would also need to be given to the viability and deliverability implications of such an approach taking into account proposed objectives 9, 12.</p>
<p>Historic England</p>	<p>As a general rule traditional building materials have lower embodied carbon than modern materials. For example, timber-framed buildings have masses of carbon locked up in their component parts, and the longer they are with us the better this figure becomes. Brick buildings are generally the product of charcoal firing, again considered relatively low carbon although there were always emissions associated with this. Stone buildings are again zero carbon particularly as the stone was quarried by human graft. Most modern building materials now come with a much higher carbon footprint, mainly because of mechanisation, but also because of high temperature kilns which burn high carbon fuels. To this end traditional building materials should be encouraged where appropriate, particularly where development could impact on the setting of historic buildings. This will also help development integrate with the local character and vernacular of the Broads.</p>
<p>Brooms Boats</p>	<p>Broom Boats believes that Building Regulations should be the foremost advisory for building design and ensuring that appropriate materials and technologies are used relevant to the significant impact environmental effects are having.</p>

Proposed way forward.

A draft policy, based largely on a recently adopted one (Central Lincolnshire Local Plan) has been produced.

This is a proposed draft section/policy for the Preferred Options Local Plan. Member’s comments and thoughts are requested.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

1 **PODMxx: Embodied Carbon**

2 **Reducing embodied carbon content through choice of materials**

- 3 1. All development should, where practical and viable, take opportunities to reduce the
4 development’s embodied carbon content, through the careful choice, use and sourcing
5 of materials.

6 **Presumption against demolition**

- 7 2. To avoid the wastage of embodied carbon in existing buildings and avoid the creation of
8 new embodied carbon in replacement buildings, there is a presumption in favour of
9 repairing, refurbishing, re-using and re-purposing existing buildings over their demolition
10 where this is the most carbon efficient option and the structure contributes, or can be
11 suitably adapted, to the positive character of the local area.

- 12 3. Proposals that result in the demolition of a building (in whole or a significant part) need
13 to be accompanied by a full justification for the demolition.

- 14 4. For non-listed buildings, demolition will only be acceptable where it is demonstrated to
15 the satisfaction of the local planning authority that:

- 16 a) the building proposed for demolition is in a state of such disrepair that it is not practical
17 or viable to be repaired, refurbished, re-used, or re-purposed; or
18 b) repairing, refurbishing, re-using, or re-purposing the building would likely result in
19 similar or higher newly generated embodied carbon than if the building is demolished
20 and a new building is constructed; or
21 c) repairing, refurbishing, re-using, or re-purposing the building would create a building
22 with such poor thermal efficiency that on a whole life cycle basis (i.e. embodied carbon
23 and in-use carbon emissions) would mean a lower net carbon solution would arise from
24 demolition and re-build; or
25 d) demolition of the building and construction of a new building would, on an exceptional
26 basis, deliver other significant public benefits that outweigh the carbon savings which
27 would arise from the building being repaired, refurbished, re-used, or re-purposed.

28 5. If a building is demolished, the Authority would expect as much useful material to be
29 reused in the new scheme as possible.

30 **Major development proposals**

31 6. A development proposal needs to demonstrate how the design and building materials to
32 be used have been informed by a consideration of embodied carbon, and that
33 reasonable opportunities to minimise embodied carbon have been taken.

34 **Reasoned Justification**

35 A significant proportion of a building's lifetime carbon is locked into its fabric and systems.
36 Embodied carbon means all the carbon dioxide (and other greenhouse gases) emitted in
37 producing materials so in the case of buildings means all the emissions from the sourcing,
38 construction and transportation of building materials, the construction of the building
39 itself, all the fixtures and fittings inside and the deconstruction and disposal at the end of a
40 building's lifetime.

41 The key to reducing embodied carbon is reusing existing buildings, reusing the materials
42 from demolished buildings, building for longevity, building using materials with a low
43 embodied carbon, and buying locally produced materials. Many buildings are capable of
44 being repaired and altered to suit new uses. Some buildings may only require minor
45 alterations and others may need to be stripped back to their main structural components.
46 High levels of insulation and new technologies can usually be retrofitted to buildings to
47 achieve high levels of thermal and energy efficiency. The priority should be reusing any
48 existing buildings onsite as this enables carbon emissions to be reduced during the
49 production of materials, construction and demolition of the building.

50 There are three elements to the policy.

51

52 i. The first refers to the choice of materials used and the carbon content of the
53 materials. Design is an important aspect to consider, and the Broads is a protected
54 landscape. The choice of materials will be a key discussion in any scheme in the
55 Broads.

56 ii. There is a presumption against demolition. The policy sets out tests for a scheme to
57 address if it involves demolition. If demolition is proved to be required, the
58 Authority would encourage the re-use of materials from the demolished building if
59 this is practicable.

60 iii. The final part of the policy sets specific requirements for major development. All
61 major development proposals should explicitly set out what opportunities to lower
62 a building's embodied carbon content have been considered, and which
63 opportunities, if any, are to be taken forward.

64 The RICS Whole life Carbon assessment for the built environment is recommended as an
65 approach for identifying opportunities to reduce emissions over the course of a building's
66 lifetime. www.rics.org/globalassets/rics-website/media/news/whole-life-carbon

67 ~~assessment-for-the-built-environment-november-2017.pdf~~ [Whole life carbon assessment](#)
68 [\(WLCA\) for the built environment \(rics.org\)](#).

69 The Construction Material Pyramid produced by the Centre for Industrialised Architecture
70 is also a useful tool understanding the impact of different building materials and calculating
71 the carbon emissions. www.materialepyramiden.dk.

72 **Reasonable alternative options**

73 a) No specific policy

74

75 **Sustainability appraisal summary**

76 The following is a summary of the assessment of the policy.

A: Preferred Option	3 positives. 0 negatives. 3 ?
B: No specific policy.	0 positives. 0 negatives. 6 ?

77 **How has the existing policy been used since adoption in May 2019?**

78 This is a new policy.

79 **Why have the alternative options been discounted?**

80 Climate change and carbon emissions are significant current issues. On occasion, there are
81 proposals in the Broads for buildings to be demolished. A policy that introduced tests and
82 considerations to fully justify any demolition is favoured.

83 **UN Sustainable Development Goals check**

84 This policy meets these [UN SD Goals](#):

11 SUSTAINABLE CITIES
AND COMMUNITIES



13 CLIMATE
ACTION



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy:

	A: Preferred Option	B: No specific policy
ENV1		The impacts are uncertain. That being said, if there is no policy that does not seek to justify demolition, more buildings could be demolished without due consideration as there are no other policy levers available.
ENV2		
ENV3		
ENV4	? The choice of materials can impact a landscape and townscape. Choice of materials is an important consideration for schemes in the Broads.	
ENV5	+ Policy addresses carbon emissions.	
ENV6		
ENV7	+ Policy seeks re-use of buildings and materials rather than demolition and disposal.	
ENV8	+ Policy seeks re-use of buildings and materials rather than demolition and disposal.	
ENV9	? The choice of materials can impact a heritage assets. Choice of materials is an important consideration for schemes in the Broads.	
ENV10	? Choice of materials is an important consideration for schemes in the Broads.	
ENV11		
ENV12		
SOC1		
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		
SOC7		
ECO1		



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Strategic Climate Change policy

Policy SP3: ~~Climate change~~ Responding to the Climate Emergency

1. The Authority ~~welcomes~~ expects and requires positive action from development ~~which~~ to reduce greenhouse gas emissions and to adapt to climate change in order to enable a move to a low carbon economy and society and help biodiversity to adapt to climate change.
2. The Authority will support proposals that help combat climate change.
3. Contributions to climate change arising from development will be minimised by means of a reduction of greenhouse gas emissions (mitigation).
4. Proposals are required, in a manner relevant and proportionate to the type of development, to ~~consider~~ address how climate change could impact development through its lifetime (adaptation and resilience).
5. Potential impacts will be identified and assessed by developers and measures taken, including:
 - a) Reducing contributions to climate change in the first place;
 - b) Using sustainable design principles that achieve energy efficiency throughout the development's lifecycle;
 - c) Maximising energy efficiency of building fabric and systems;
 - d) Minimising the carbon emissions resulting from sourcing of construction materials and construction;
 - e) Locating development so access to services and facilities can be made using modes other than single occupancy car use;
 - f) Implementing green travel plans;
 - g) Incorporating small-scale renewable energy technologies into development; and
 - h) Considering the potential impacts as a result of climate change on development, the natural and historic environment and users of the development.

Reasoned Justification

Climate change is the biggest challenge we face, and it is a strategic priority that all development proposals address it through careful design, mitigation and adaptation.

Mitigating climate change means reducing greenhouse gas emissions, to slow down the rate of global warming and achieve the national commitment to reaching net zero carbon emissions by 2050.

32 To achieve the vision of net zero emissions by 2050, everyone in the Broads will need to use
33 less energy. The way we manage our land will need to change so it absorbs more
34 greenhouse gas. In the long-term, buildings will need to be more thermally efficient, avoid
35 building in flood plains and design roads and transport infrastructure that is climate
36 resilient. Not all decisions will be popular and there will be costs to achieving change.

37 Adapting to climate change means designing development so that it is adapted to the
38 changing climate, in particular hotter summers, wetter winters, and increased risks of
39 surface water and tidal flooding including prolonged periods of inundation. Climate adapted
40 design must be achieved without resulting in increased emissions, for example from using
41 air-conditioning to avoid overheating.

42 The story of the Broads is inherently linked to our changing climate. The easterly, low-lying
43 and coastal nature of the Broads landscape makes it particularly vulnerable to the predicted
44 impacts of climate change and sea level rise, including coastal and river flooding.

45 At the same time, our wetland landscape has been steadily sequestering carbon since the
46 end of the last ice age, and now stores the equivalent of an estimated 50,000,000 tonnes of
47 CO2. In context, that is more CO2 than was released by all coal-burning power plants in the
48 UK in the last year.

49 We need to plan now for the changes ahead, such as wetter winters, drier and hotter
50 summers, and more frequent extreme events like storms and heavy rainfall, to lessen
51 negative impacts and make the best use of positive opportunities of the emerging green
52 economy. Even if all emissions ceased today, our climate would continue to change as a
53 result of historic emissions.

54 It will be vital to the long-term sustainability of the area and the health, safety and quality of
55 life of the community, that adaptations are made and new development is designed to deal
56 with changes in the climate and reduce their greenhouse gas emissions.

57 Climate change and sea level rise are key challenges facing the Broads. The extent of these
58 changes will depend on the level of society's response to the emission of greenhouse gases,
59 particularly carbon dioxide from burning fossil fuels.

60 Key impacts of climate change in the Broads are likely to include:

- 61 • greater demand for water resources;
- 62 • increased risks from flooding;
- 63 • intrusion of saline water into the freshwater system;
- 64 • changes in the distribution of habitats and species, with some net loss of native
- 65 biodiversity and increase in non-native and invasive species; and
- 66 • a more productive wetland system, requiring more management intervention.

67 ~~There are two general approaches to the issue of climate change:~~

- 68 ~~• Climate change mitigation is about reducing greenhouse gas emissions through~~
- 69 ~~changing behaviour – for example, improving housing insulation to reduce energy~~
- 70 ~~demand, installing solar panels so relying less on fossil fuels, and using the car less.~~

71 ~~▲ Climate change adaptation and resilience is about being prepared for a changing~~
72 ~~climate—for example connecting up habitats to allow species to move according to~~
73 ~~climate conditions, or identifying particular areas ready to take excess water in times of~~
74 ~~flood.~~

75 Innovative solutions in development and design are needed to address the challenges and
76 opportunities presented by climate change and sea level rise.

77 It is recognised that the specific response from individual development proposals will
78 depend on their scale and that some issues will be less relevant, but all proposals will have a
79 role in helping to deliver change.

80 Policies elsewhere in this Local Plan require that high standards of design are achieved, but
81 it will also be necessary to incorporate high levels of resource efficiency and energy
82 conservation in development. These will need to be compatible with design objectives and
83 not have an adverse impact on the local landscape character or visual amenity of an area.

84 In principle, renewable energy will be supported, subject to there being no adverse impact
85 on the landscape, wildlife, navigation, recreational interest or other factors considered
86 important in the consideration of any proposals.

87 It is imperative that climate change contribution from transport use is adequately mitigated
88 and managed. This will be achieved by promoting and encouraging the use of low emission
89 and alternative fuel cars and boats, supporting the provision of electric recharging points,
90 encouraging walking, cycling the use of public transport and sailing, promoting the port
91 gateways at Great Yarmouth and Lowestoft for boats arriving and leaving the area, and
92 raising awareness about the impacts of climate change on the Broads.

93 Reasonable alternative options

- 94 a) No specific policy
- 95 b) Original policy

96 Sustainability appraisal summary

97 The following is a summary of the assessment of the policy.

A: Preferred Option	5 positives. 0 negatives. 0 ?
B: No specific policy.	0 positives. 0 negatives. 5 ?
C: Original policy	3 positives. 0 negatives. 0 ?

98 How has the existing policy been used since adoption in May 2019?

99 According to recent Annual Monitoring Reports, the policy has been used and schemes have
100 been permitted in accordance with the policy.

101 Why have the alternative options been discounted?

102 Climate change and carbon emissions are significant current issues and so to have a
103 strategic policy is prudent. The amended policy strengthens the existing and is therefore
104 favoured.

105 **UN Sustainable Development Goals check**

106 This policy meets these [UN SD Goals](#):

11 SUSTAINABLE CITIES
AND COMMUNITIES



13 CLIMATE
ACTION



1 Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
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- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
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- ENV11: To improve air quality and minimise noise, vibration and light pollution.
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- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
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- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

		A: Preferred Option	B: No specific policy	C: Original policy	
ENV1	+	Policy refers to locating development with good access to services and facilities.	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.		
ENV2					
ENV3					
ENV4					
ENV5	+	Policy relates to climate change.		+	Policy relates to climate change.
ENV6					
ENV7	+	Policy refers to construction and the lifecycle of the development.		+	Policy refers to the lifecycle of the development.
ENV8					
ENV9					
ENV10					
ENV11					
ENV12	+	Policy refers to renewable energy.		+	Policy refers to renewable energy.
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6	+	Policy refers to locating development with good access to services and facilities.			
SOC7					
ECO1					
ECO2					
ECO3					



**Local Plan for the Broads - Review
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Climate change adaptation and resilience checklist

Issues and Options section

One of the approaches to adapting to climate change, set out in the current Local Plan, is the requirement for applicants for some types of development to fill out a [climate change checklist](#) to show how they have considered and addressed the risks that climate change poses to their proposed development. We intend to roll forward the climate change checklist approach, with some amendments such as making the questions clearer.

Question 6: Do you have any thoughts on this approach and the climate change checklist?

Issues and Options – comments received.

Organisation	Comment	Response	Way forward
Bradwell Parish Council	It seems eminently sensible to plan for climate change to minimise the impact.	Support noted.	No further action.
East Suffolk Council	East Suffolk Council welcome the inclusion of the climate change checklist. However, the checklist asks what the impact level is (small, medium, significant etc) which could be rather subjective. Therefore you may want to consider if there is value in providing more space on the checklist for applicants to demonstrate how they have considered and mitigated for future climate changes. A section could also be added regarding the related time impacts – i.e. ‘immediate / future	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.

Organisation	Comment	Response	Way forward
	<p>impact, plus the frequency (e.g. annually / every 10 years), as some mitigation measures may require ongoing maintenance or investment.</p>		
RSPB	<p>The approach is limited to built development. Given the intrinsic link between built development and development/management elsewhere in the Broads we suggest comment is made and planning undertaken to describe the predicted impact on floodplain habitats. There is a link here to both agriculture and focus of questions 30 and 31 and the aspiration to make the Broads an attractive and viable place to visit and enjoy. This could be compromised if development either directly or indirectly leads to the deterioration of the landscape and natural assets.</p>	<p>Comment noted. However, all the Local Plan can really cover is built development. Whilst there is benefit in making information available about wider issues, this is better done through other documents such as the Broads Plan and the Local Nature Recovery Strategy.</p>	<p>No further action.</p>
Sequence UK LTD/Brundall Riverside Estate Association	<p>2.16No objection to the climate change checklist being rolled forward from the current local plan. We welcome the suggested amendments to making the questions clearer but the reserve the right to comment further when those amendments are published.</p>	<p>Support noted.</p>	<p>Consider this comment as produce Preferred Options version of the Local Plan.</p>

Organisation	Comment	Response	Way forward
South Norfolk Council	<p>Whilst this would bring awareness to climate change in new developments and in turn be consistent with Agreement 20 of NSPF, the overall aim and justification for the climate change checklist needs further detail and justification. For example it would be useful to clarify who would be filling this checklist in and whether this needed to be an environmental specialist? It would be beneficial to understand what type of development would require a checklist. In addition, the impact seems to be measured by 'nil, small, medium, significant' but the Council couldn't identify where there was guidance on what each category meant. Again, further clarity on who would be completing this element in order to make a judgement would be beneficial as would explanation of what evidence, or what types of evidence, would be required to demonstrate the judgements made. Overall, it is considered that further information is required to understand what the checklist would achieve and its specific impact on decision making e.g. if a development falls within the 'nil' category would this warrant a refusal, or is this just an aid to understanding of the extent to which the development has specifically considered climate change?</p>	<p>Noted. The checklist is not new; it was part of the currently adopted Local Plan. But comments are useful and will be considered as we produce climate change policies.</p>	<p>Consider comments we produce climate change policies.</p>
Suffolk County Council	<p>Suffolk County Council supports the Local Plan's position on climate change and the use of the accompanying climate change checklist.</p>	<p>Support noted.</p>	<p>No further action.</p>

Organisation	Comment	Response	Way forward
Broadland Council	<p>Whilst this would bring awareness to climate change in new developments and in turn be consistent with Agreement 20 of NSPF, the overall aim and justification for the climate change checklist needs further detail and justification. For example it would be useful to clarify who would be filling this checklist in and whether this needed to be an environmental specialist? It would be beneficial to understand what type of development would require a checklist. In addition, the impact seems to be measured by 'nil, small, medium, significant' but the Council couldn't identify where there was guidance on what each category meant. Again, further clarity on who would be completing this element in order to make a judgement would be beneficial as would explanation of what evidence, or what types of evidence, would be required to demonstrate the judgements made. Overall, it is considered that further information is required to understand what the checklist would achieve and its specific impact on decision making e.g. if a development falls within the 'nil' category would this warrant a refusal, or is this just an aid to understanding of the extent to which the development has specifically considered climate change?</p>	<p>Noted. The checklist is not new; it was part of the currently adopted Local Plan. But comments are useful and will be considered as we produce climate change policies.</p>	<p>Consider comments we produce climate change policies.</p>

Summary and way forward

The Checklist was designed to be a self-assessment or prompt for applicants to consider the impacts of climate change. It is not necessarily assessed by Development Management Officers. We feel that the self-assessment approach still has merits and so propose to continue with the checklist with some amendments. We have added two columns; one to describe the original plan in terms of the specific issue and the second column to describe how the plan or scheme has changed in light of that issue. We have also made it simpler by removing the impact level columns. An applicant will be asked to fill this checklist out and submit it as part of an application. This checklist will not be part of the validation requirement.

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments, and this section will form part of the Preferred Options version of the Local Plan.

Policy PODM9: Climate change adaption and resilience ~~smart~~ checklist –

Development proposals which would result in new build, replacement, change of use or an increase in floor space must demonstrate how climate change has been taken account of in the scheme with the submission of a Climate Smart Checklist (see [Appendix F: Climate-Smart Checklist](#)).

Reasoned Justification

The current projections are that by the 2050s we will start to see significant climate change (UKCIP 2009), and early adaptation planning is likely to save money and better protect property and lives in the long run.

Cutting carbon emissions remains the most cost-effective step that everyone can take, but adaptation needs to be considered alongside, but not instead of, mitigation. There is a strong case for both accelerating emissions reductions but also preparing for the impacts of a changing climate. Although individual actions need careful evaluation, many studies show that adaptation action is generally cheaper, and more effective over time than the costs incurred responding to the impacts over time. Through careful planning, adaptation actions can deliver multiple wider benefits to projects or activities such as improving health and wellbeing, property values, skills, and employment, reducing emissions and supporting biodiversity.

Climate projections for the Broads will depend on how effectively we deal with global greenhouse gas emissions. There will be some inevitable change to the climate due to the gases already in the atmosphere, but the more extreme changes should be avoided if there is prompt action to reduce emissions in the short term. In simple terms, the best current opinion¹ about likely changes that will impact on the Broads include warmer, drier summers, slightly wetter, warmer winters, and more extreme events in terms of frequency

¹ UK CIP (Climate Impacts Programme) 2009 'medium emissions' scenario for the East of England

25 and severity. The sea level is already rising, and this is being increased by the changing
26 climate.

27 The Broads is vulnerable to greater flood risk, storms, droughts, and heatwaves, all of which
28 could affect how we use land and buildings, how we get around, the wildlife around us, and
29 how the environment we enjoy looks and functions.

30 It is acknowledged that the extent to which climate change happens, and its impact on the
31 Broads, will be affected by actions nationally and globally, and Local Plan policies cannot
32 protect the Broads from this. They can, however, contribute to an approach that seeks to
33 reduce climate change through positive action and to mitigate its effects.

34 Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires local planning
35 authorities to include in their Local Plans *'policies designed to secure that the development
36 and use of land in the local planning authority's area contribute to the mitigation of, and
37 adaptation to, climate change'*.

38 This Local Plan includes specific policy approaches that seek to address mitigation and
39 adaptation needs, such as through the approach to renewable energy (DM15), flood risk
40 management (DM5), design (DM43), and transport (DM23).

41 ~~In addition to these specific policies, the Authority promotes the use of a 'climate smart'
42 approach, whereby any proposed development is reviewed against climate projections² to
43 see what resilience and adaptation options might be included to inform the details of the
44 proposal. This includes identifying changes that would need to be implemented when
45 certain 'trigger' conditions are reached, and building in enough flexibility to cope with
46 differing climate scenarios. It also suggests looking at revised outcomes if the changes
47 cannot be accommodated in the initial ideas (see Appendix E for details of the climate smart
48 planning cycle).~~

49 Reasonable alternative options

50 a) No policy

51 Sustainability appraisal summary

52 The options have been assessed in the SA. The following is a summary.

A: Have a policy	2 positives. 0 negatives. 0 ? Overall, positive.
B: No policy	0 positives. 0 negatives. 2 ?

53 How has the existing policy been used since adoption in May 2019?

54 According to recent Annual Monitoring Reports, the policy has been used, but not every
55 scheme that needs to fill a checklist out has done.

56 Why have the alternative options been discounted?

² Climate projections: www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

57 It is hoped that the checklist will prompt applicants to consider how their scheme will
58 operate and be used in a changing climate and so using the checklist is favoured.

59 **UN Sustainable Development Goals check**

60 This policy meets these [UN SD Goals](#):

3 GOOD HEALTH
AND WELL-BEING



11 SUSTAINABLE CITIES
AND COMMUNITIES



13 CLIMATE
ACTION



Climate-smart change adaptation and resilience checklist

How to complete the checklist

Consider the development as a whole and in terms of its constituent parts including groundworks, construction (low and high level), height of items, water flow on and off the site, and proximity to external risk factors (including sea, rivers, streams, ditches, trees, other construction).

We suggest you initially consider your development against current average weather conditions. Then consider recent weather extremes, and what those impacts might do to your development. For example, could it cope with sudden, very intense rain showers? Would a week of mid 30°C temperatures melt anything?

You should then consider future climate projections (relevant to how long you think your development will last). ~~As these are only projections, first consider how likely things are to happen, and at what rate (for example, if you think greenhouse gas emissions will decline quickly, the chances of the highest level projections being reached are slim, and vice-versa).~~

You should also consider what level of risk you could live with (for example, if you think that tolerating significant fluctuations in temperature is an unacceptable risk, you may choose to incorporate certain adaptive features in your development). You may also want to think about potential future occupiers and how attractive 'climate-smart' features would be to them.

Looking to the future will help you consider whether your development needs to be more resilient or adapted to cope more effectively with climate impacts (for example, moving to a different part of the site where there will be more shade for the house, or tree planting to provide shade).

It is particularly important to consider the potential changes in extreme weather conditions. Projections are that such extremes may become more frequent, as well as reaching new highs or lows, such as more intense bursts of rainfall due to increased thunderstorms.

Additional information and advice

To support this checklist, the Broads Authority has a range of additional guidance on getting the best from your development proposals:

- a) **Sustainable Development Guide**³. This gives comprehensive advice, across a range of development types, on incorporating a sustainable approach. The Guide will be reviewed every three years.
- b) **Broads' Community advice**⁴: Produced by the Broads Climate Partnership, this gives more detailed suggestions for farmers, businesses, and local communities on adapting to climate change.
- c) **Broads Climate Adaptation Plan**⁵: Produced in 2015, the Plan introduces current thinking about climate adaptation for the Broads, and sets out the 'climate-smart' approach.

Explanatory notes

Remember that, just as now, there will be chances of extremes at both ends of the weather spectrum (such as heavy snow fall, winter 'heatwaves', freak hailstorms, flash flooding and extreme heat), for which you should be making allowances according to your assessment of risk.

Sea level rise: Current projections for sea level rise range from 37cm to over 1m by the end of the 21st century. A rising sea increases the threat of over-topping defences or stopping heavy rainfall from running

³ Sustainability Guide: www.broads-authority.gov.uk/_data/assets/pdf_file/0015/410307/SustainabilityGuide.pdf Sustainability Guide (broads-authority.gov.uk)

⁴ Broads' Planning Committee, 02 February 2024, agenda item number 14 [Climate change \(broads-authority.gov.uk\)](http://www.broads-authority.gov.uk/looking-after/climate-change)

⁵ Climate Change Adaptation Plan: www.broads-authority.gov.uk/looking-after/climate-change

out to sea. It is also likely to mean salty water is pushed further up the rivers (altering wildlife distribution and perhaps increasing corrosion) and could mean air draft under bridges at high tide is likely to be reduced. Higher initial levels could also worsen impacts when surge conditions (strong winds and depressions) combine to push water inland.

Surface water flooding: With more impermeable surfaces due to development, heavy rainfall can overwhelm drains and ditches and give rise to a higher threat of surface water flooding. [Sustained high water tables may be an issue in some locations.](#) By keeping land permeable to rainfall, having overflow areas that can hold excess water, or incorporating flood barriers into the building, the risk can be lowered.

Increased water temperature in watercourses: Increased temperatures alongside high nutrients may increase the probability of blue-green algal blooms, which can be toxic, or excessive aquatic vegetation growth. The increased river/lake temperature may also affect the overall distribution of species, with knock on effects such as on recreation interests.

Heatwaves: Periods of high temperature caused by trapping energy in the atmosphere, along with more cloud free days, could see the prolonged periods of sunshine melting certain materials or causing human health issues. Developing ways to shade living and working spaces (such as window shutters or tree planting) [or enable heat to be vented from dwellings overnight](#) may provide improved tolerance.

Drought: Longer periods of no rainfall could put stress on water levels. This may affect the environment and wildlife (such as low flow in rivers or ponds drying out), and could also decrease the amount available for people to use.

Next steps

According to your acceptance of risk, you may wish to make more a detailed exploration and assessment when your self-assessment reaches a certain impact level (e.g. for all 'significant' and above impacts).

What will happen to the development and/or the users or occupiers if there is...?		How have you designed the development to address this?	
		<u>What was the original design or plan for the scheme?</u> <i>Briefly explain how your original scheme addressed this issue or write 'did not address' if that's the case.</i>	<u>How have you changed your scheme to reflect this issue?</u> <i>Briefly explain how you have changed your scheme to reflect this issue or write 'no change' if that's the case.</i>
Higher summer temperatures (average and maximum) <u>and sustained heatwaves</u>			
Longer periods of drought during the summer			
Longer periods of cloud free days			
Water (river, stream and lake) temperatures increased through year especially the summer			
Rainfall coming in more intense bursts	Greater potential for surface water flooding		
	More potential for higher ditch, stream and river levels		
Fewer frosty days			
More frequent storms – the effect of rain and wind			
More extreme / intense storms – the effect of rain and wind			
Rise in sea level			
Increase in salinity in the rivers			
Surge conditions in the North Sea			

1 Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

		A: Preferred Option	B: No specific policy	
ENV1			The impacts are uncertain. That being said, if there is no policy that does not seek to prompt applicants about how their scheme will operate and function in a changing climate, they may not consider this.	
ENV2				
ENV3				
ENV4				
ENV5	+	The policy is about adapting to and becoming resilient to climate change.		?
ENV6				
ENV7				
ENV8				
ENV9				
ENV10	+	Generally, by adapting to climate change and being resilient the design will be good.		?
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				



**Local Plan for the Broads - Review
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Energy demand and performance of new buildings (including extensions)

Information for Members

Setting standards for new buildings in Local Plans in terms of energy performance is complicated and not clear.

Prior to the Future Homes Standard¹, Local Plans were able to require housing development to go 19% better than building regulations. That is what the [Greater Norwich Local Plan](#) required when it was submitted: Policy 2 says 'All new development will provide a 19% reduction against Part L of the 2013 Building Regulations (amended 2016)'.

In June last year, Building Regulations were changed to result in energy savings of 31% as part of the Future Homes Standard. That is a stepping stone approach to being zero carbon ready by 2035.

The [North Norfolk Local Plan](#), as submitted, includes the 31% as a policy: Policy CC3 says 'New build residential development, including replacement dwellings, must achieve reductions in CO2 emissions of a minimum 31% below the Target Emission Rate of the 2013 Edition National Building Regulation, (amended 2016) (Part L) unless superseded by national policy or legislation'. It also requires development to be zero carbon by 2035: Policy CC3 says 'by 2035 all new dwellings and workplaces should be zero carbon ready'.

The next steps of the Future Homes Standard are not set out in law, so there is no certainty that Building Regulations will be amended by 2035 to require zero carbon ready. It should be noted that at the time of writing, a technical consultation on the Future Homes Standard to come in 2025 was open: [The Future Homes and Buildings Standards: 2023 consultation - GOV.UK \(www.gov.uk\)](#)

The following policy, as written, therefore does not set any particular standard of building regulations or net zero. It is proposed that we monitor progress on the NNDC and GN Local Plan equivalent policies, and indeed other Local Plans going through examination, to see what policy approach is preferred. We would make changes to the draft policy below to reflect findings in the next version of the local plan.

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

¹ This is a government commitment to a programme of progressive changes to regulations covering construction to improve building performance.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy PODM14: Energy demand and performance of new buildings (including extensions)

1. The expected energy use of buildings must be as low as possible; the building regulation standards are the minimum. Applicants will be required to demonstrate what measures they have taken to achieve more energy efficiency.

Reducing energy requirements of new build

2. Developments ~~of over 10 dwellings~~ are required to meet or reduce at least 10% of their predicted energy requirements, using the following hierarchy:

- a) Reduce the overall energy demand in the first place. Development is required to take a 'fabric first' approach and reduce overall energy demand through its design, materials, layout and orientation.
- b) Energy efficient and conservation measures. Proposals are then also required to maximise the use of energy efficiency and energy conservation measures; and
- c) Decentralised and renewable or low-carbon sources for any residual amount.

3. Buildings designed to Passivhaus standard (or equivalent) would generally be encouraged, subject to other relevant policies of the Plan.

Reducing Energy Consumption in Existing Buildings

4. For all development proposals which involve the change of use or redevelopment of a building, or an extension to an existing building, the applicant is encouraged to consider all opportunities to improve the energy efficiency of that building including the original building, if it is being extended.

5. Where the building pre-dates 1919², methods of improving energy efficiency should be carefully considered so that they are not detrimental to the fabric of the building.

~~Developments of non-housing development over 1,000m² are required to meet or reduce at least 10% of their predicted energy using the hierarchy as set out at a, b and c above, and are encouraged to achieve at least the BREEAM 'Very Good' standard or equivalent.~~

² [Retrofit and Energy Efficiency in Historic Buildings | Historic England](#)

27 **Heritage Assets**

- 28 6. Planning permission and, where relevant, listed building consent will be granted for
29 works required to improve the energy performance of ~~heritage assets~~ designated and
30 non-designated heritage assets where it complies with other relevant policies and can
31 be clearly demonstrated that this is compatible with all of the following:
- 32 a) The heritage asset's character and appearance;
 - 33 b) The heritage asset's special architectural or historic interest;
 - 34 c) The long-term conservation of the built fabric; and
 - 35 d) The wider setting of the heritage asset.

36 **Energy Statement**

- 37 7. An energy statement which demonstrates the approach is required to accompany
38 planning applications.

39 **Reasoned Justification**

40 The Climate Change Act 2008 legislates for a 34% reduction in greenhouse gas emissions
41 against 1990 levels by 2020, and an ~~80%~~ 100% reduction by 2050. The Climate Change
42 Committee recommended pathway to 2035 recommends a 78% fall in emissions against the
43 1990 baseline. The incorporation of renewable energy generation technologies and energy
44 efficiency measures into the design of new development can make a significant contribution
45 to achieving these targets.

46 The policy approach seeks development that is designed to reduce energy demand in the
47 first place, then to use energy efficiency improvements, and finally to use renewable energy
48 technologies where appropriate.

49 On-site provision will normally be the preferred mechanism for decentralised and
50 renewable or low-carbon sources. However, off-site schemes will be permitted where it
51 would result in the generation of a greater amount of energy or would have a lesser
52 visual/environmental impact. Planning conditions and/or obligations will be used to make
53 sure the energy infrastructure comes on-line before the development is occupied.

54 Addressing climate change is also about making improvements to resource and energy
55 efficiency. ~~Building Research Establishment Environmental Assessment Method (BREEAM)~~
56 ~~building standards are nationally recognised levels that require building design and~~
57 ~~construction to address these challenging issues.~~

58 **Future Homes Standard**

59 Government is committed to improving the energy efficiency of new homes through the
60 Building Regulations system through the Future Homes Standard (FHS). The introduction of
61 the FHS will ensure that an average home will produce at least 75% lower CO2 emissions
62 than one built to recent/current energy efficiency requirements. Homes built under the FHS
63 will be 'zero carbon ready', which means that in the longer term, no further retrofit work for
64 energy efficiency will be necessary to enable them to become zero-carbon homes as the
65 electricity grid continues to decarbonise. However, the FHS is only proposed to take effect
66 from 2025 and there is no legal guarantee of even that date being met. There has been an

67 uplift in Building Regulations as a step towards FHS having taken place in 2022 which changes
68 Part L of the Building Regulations to reduce carbon emissions by 31% for new homes through a
69 set of reformed insulation and air tightness requirements.

70 **Design principles**

71 The following design expectations should be considered and in the following order:

- 72 1. Orientation of buildings – such as positioning buildings to maximise opportunities for
73 solar gain, and minimise winter cold wind heat loss whilst also addressing the risk of
74 overheating;
- 75 2. Form of buildings – creating buildings that are more efficient to heat and stay warm in
76 colder conditions and stay cool in warmer conditions because of their shape and design;
- 77 3. Fabric of buildings – using materials and building techniques that reduce heat and
78 energy needs. Ideally, this could also consider using materials with a lower embodied
79 carbon content and/or high practical recyclable content;
- 80 4. Heat supply – net zero carbon content of heat supply (for example, this means no
81 connection to the gas network or use of oil or bottled gas);
- 82 5. Renewable energy generated – generating enough energy from renewable sources
83 onsite (and preferably on plot).

84 **Passivhaus**

85 Where Passivhaus certification is being sought, a ‘pre-construction compliance check’
86 completed by a Passivhaus certifier will be required, secured by condition and upon
87 completion, a Quality Approved Passivhaus certification for each dwelling/ building will be
88 required.

89 **Retrofit**

90 The UK’s Committee on Climate Change has identified retrofitting existing homes as one of
91 five priorities for government action (CCC, 2019). The policy encourages applicants to
92 improve the energy efficiency of the existing building if appropriate to do so.

93 **Heritage assets**

94 Historic England (Heritage Counts) research shows that sympathetic refurbishment and
95 retrofit can reduce the carbon emissions of historic buildings by over 60% by 2050. The
96 Heritage Counts research also demonstrates that the speed at which carbon is reduced in
97 buildings has a greater impact than the scale of retrofit showing that the sooner actions are
98 taken the more effectively we can address carbon in buildings.

99 The retro-fit of historic buildings to enhance their energy efficiency would be welcomed
100 subject to it meeting the tests. ~~has the potential to become an issue.~~ The Authority will
101 assess the impact of the adaptations, taking regard of the significance of the historic asset
102 and the character, historic interest, setting and integrity of the elements of the asset likely
103 to be affected³. The ‘whole-house approach⁴’ is encouraged for use in historic buildings and

³ Historic England guidance Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/> may be helpful in understanding these special considerations. And Energy Efficiency and Historic Buildings | Historic England may be of relevance.

⁴ Guidance can be found here: [STBA Whole House Approach – STBA \(stbauk.org\)](https://www.stbauk.org/)

104 it is likely that the measures taken in a listed building will need to be bespoke, taking into
105 account the construction and special characteristics of the building.

106 **Guidance**

107 Further guidance on designing new development to minimise energy consumption is
108 provided in the Broads Authority’s Sustainability Guide⁵.

109 The Broads Authority may want to consider the Net Zero Carbon Toolkit when looking at the
110 design of new homes and the retrofitting of existing homes: www.greensuffolk.org/net-zero-carbon-toolkit-housing/.

112 **Reasonable alternative options**

113 a) No specific policy

114 **Sustainability appraisal summary**

115 The following is a summary of the assessment of the policy.

A: Preferred Option	4 positives. 0 negatives. 0 ?
B: No specific policy.	0 positives. 0 negatives. 4 ?

116 **How has the existing policy been used since adoption in May 2019?**

117 This is a new policy.

118 **Why have the alternative options been discounted?**

119 With a changing climate, we are likely to experience more instances of hot weather. So it
120 will be important to design buildings and the public realm with shade and cooling in mind.
121 As such, a policy is considered prudent. There may be some building regulations in place,
122 but this policy complements them.

123 **UN Sustainable Development Goals check**

124 This policy meets these [UN SD Goals](#):

11 SUSTAINABLE CITIES
AND COMMUNITIES



13 CLIMATE
ACTION



⁵ Sustainability Guide: <http://www.broads-authority.gov.uk/planning/planning-permission/design-guides> Sustainability Guide (broads-authority.gov.uk)

1 Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
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- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy:

	A: Preferred Option	B: No specific policy	
ENV1		The impacts are uncertain. That being said, if there is no policy that does not seek to consider shade and cooling and building regulations are not in place for all types of buildings, the current situation will continue.	
ENV2			
ENV3	+ Green roofs and walls will benefit biodiversity.		?
ENV4			
ENV5	+ Policy seeks to adapt and be resilient to a changing climate.		?
ENV6			
ENV7			
ENV8			
ENV9			
ENV10	+ The policy will result in well designed places.		?
ENV11			
ENV12			
SOC1	+ A key benefit of providing shade and cooling is to health and wellbeing.		?
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			



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Non-residential development and BREEAM

Information for Members

Using the BREEAM approach, a building may not score highly on energy use, but score very highly on other matters (like water use, ecology, waste and innovation) and still consequently achieve a very good rating. Whilst this may mean a building which meets the required level of BREEAM rating may not be as any efficient as it could be, the wider environmental and carbon-related benefits of achieving at least a very good BREEAM rating is considered appropriate.

The whole Local Plan viability assessment, that will be conducted on the next version of the Local Plan, will test the viability impact of the policy requirements. It may be that higher ratings of excellent or even outstanding could become part of the requirement.

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

- 1 **PODMx: Non-residential development and BREEAM**
- 2 Proposals for non-residential development above 250sqm floor space are required to
- 3 achieve a minimum of BREEAM Very Good Standard or equivalent unless it can be
- 4 demonstrated that it is not viable or feasible to do so.

- 5 Development must achieve 3 credits in BREEAM category Wat 01.

- 6 **Reasoned justification**
- 7 [BREEAM](#) is the world's leading sustainability assessment method for master planning
- 8 projects, infrastructure and buildings. Assets are assessed through third party certification,
- 9 using standards developed by BRE (The Building Research Establishment).

- 10 BREEAM assesses much wider issues than just energy use, such as water, waste, health and
- 11 wellbeing and building materials. Each category is sub-divided into a range of assessment

12 issues, each with its own aim, target and benchmarks. When a target or benchmark is
 13 reached, as determined by the BREEAM assessor, the development or asset score points,
 14 called credits. The category score is then calculated according to the number of credits
 15 achieved and its category weighting. Once the development has been fully assessed, the
 16 final performance rating is determined by the sum of the weighted category scores. The
 17 policy specifies that three water credits are required – this reflects that the area is in water
 18 stress.

19 Compliance will be required through planning conditions including BREEAM certification for
 20 non-residential proposals.

21 **Reasonable alternative options**

22 a) No specific policy

23 An alternative could be to require a higher rating, such as excellent. The potential for this
 24 will be assessed through the whole plan viability assessment. It is not included as an
 25 alternative for this version of the Local Plan; we await the viability assessment.

26 **Sustainability appraisal summary**

27 The following is a summary of the assessment of the policy.

A: Preferred Option	8 positives. 0 negatives. 0 ?
B: No specific policy.	0 positives. 0 negatives. 8 ?

28 **How has the existing policy been used since adoption in May 2019?**

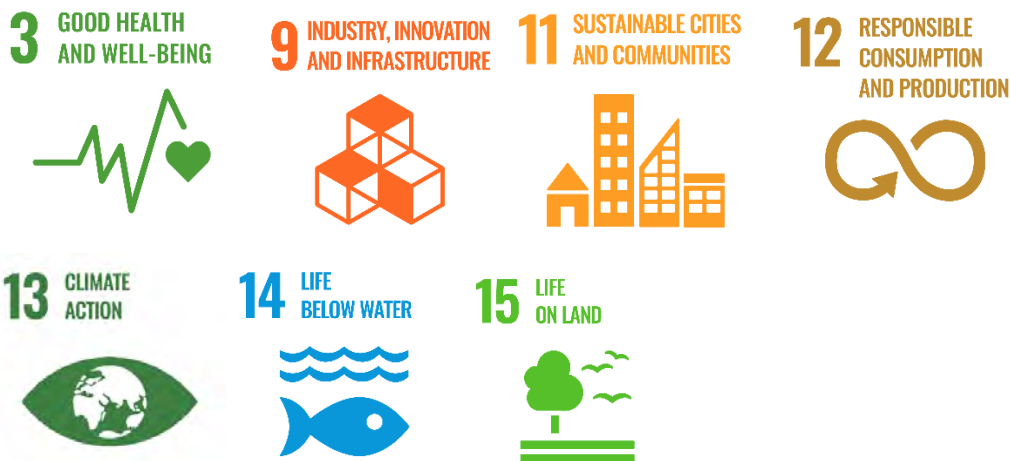
29 This is a new policy.

30 **Why have the alternative options been discounted?**

31 In the current local plan, we focussed just on the water element of BREEAM. However, the
 32 BREEAM scheme is not designed to be used in parts. As such, and considering the wider
 33 benefits of a scheme being BREEAM compliant, a policy that sets a standard and threshold
 34 for BREEAM as a whole is favoured.

35 **UN Sustainable Development Goals check**

36 This policy meets these [UN SD Goals](#):



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
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- SOC5: To maximise opportunities for new/ additional employment
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- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy:

		A: Preferred Option	B: No specific policy
ENV1	+	Part of the assessment relates to transport and travel.	? . Not setting a BREEAM requirements does not mean that these objectives will not be positively impacted; but having the policy provides more certainty.
ENV2	+	Part of the assessment relates to water.	
ENV3	+	Part of the assessment relates to ecology.	
ENV4			
ENV5			
ENV6			
ENV7	+	Part of the assessment relates to materials and energy.	
ENV8	+	Part of the assessment relates to waste.	
ENV9			
ENV10	+	Fundamentally, meeting the good standard in BREEAM will mean a development is well-designed.	
ENV11			
ENV12			
SOC1	+	Part of the assessment relates to health and wellbeing.	
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2	+	BREEM covers social and environmental aspects.	
ECO3			



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Heat resilient design

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

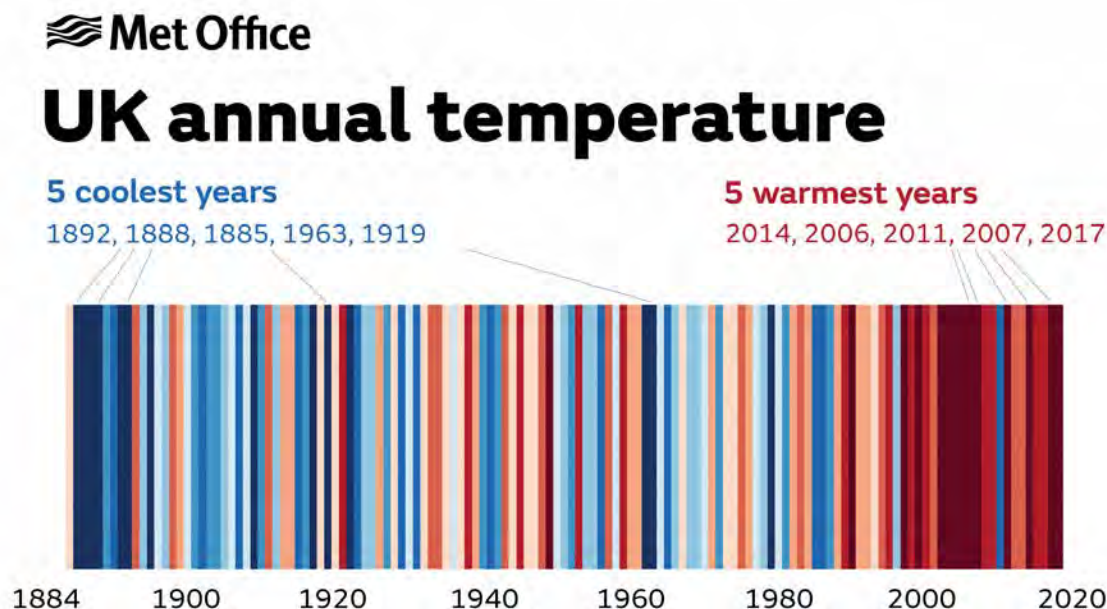
The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

Policy PODMxx: Heat resilient design

1. All schemes for new buildings need to prevent and minimise the impacts of overheating in the built environment.
2. Proposals for new buildings must demonstrate, commensurate with the scale and location of the proposal, consideration of:
 - a) How the design of the development minimises overheating and reduces demand on air conditioning systems, including considering:
 - i) orienting buildings to maximise the opportunities for both natural heating and ventilation and to reduce wind exposure;
 - ii) measures such as solar shading, thermal mass and appropriately coloured materials in areas exposed to direct and excessive sunlight;
 - iii) maximise passive cooling through natural ventilation and other passive means. Reliance on air conditioning systems should be avoided; and
 - iv) Provision of shade in public spaces, as appropriate.
 - b) In considering the above, the balance between solar gain versus solar shading will need to be carefully managed.
3. The potential to incorporate a green roof and/or walls to aid cooling, add insulation, assist water management and enhance biodiversity, wherever possible linking into a wider network of green infrastructure; unless such roof space is being utilised for photovoltaic or thermal solar panels; or on a whole life cycle basis, it is demonstrated that a lower specification roof has a significantly lower carbon impact than a green roof; or the nature of the development makes it impracticable to incorporate a green roof.

Reasoned Justification

25 The following diagram shows the UK annual temperatures from 1884 to 2018¹. Blue are
 26 cooler years and red are hotter years. The warmest years have been since 2006. We have
 27 experienced the warm temperatures in recent summers locally in Norfolk and Suffolk.



28 Modelling carried out by the Tyndall Centre² shows a significant increase in the incidence of
 29 heat related mortality in the UK as the climate warms.

30 This increase is attributable to both rising regional temperatures, but also to an aging
 31 population. As the Broads population tends to be older than the UK average, this means a
 32 particular focus is needed on ensuring housing is heat resilient.

33
 34 The policy seeks proposals for new buildings to consider the impact of higher temperatures
 35 considering shade, passive cooling and natural ventilation. The policy also applies to the
 36 public realm associated with the scheme, seeking shade in public spaces.

37
 38 **Reasonable alternative options**

39 a) No specific policy

40 **Sustainability appraisal summary**

41 The following is a summary of the assessment of the policy.

A: Preferred Option	4 positives. 0 negatives. 0 ?
B: No specific policy.	0 positives. 0 negatives. 4 ?

¹ [Top ten UK's hottest years all since 2002 - Met Office](#)

² Updated projections of UK heat-related mortality using policy-relevant global warming levels and socio-economic scenarios, Kenkins et al 2022. [Updated projections of UK heat-related mortality using policy-relevant global warming levels and socio-economic scenarios — University of East Anglia \(uea.ac.uk\)](#)

42 **How has the existing policy been used since adoption in May 2019?**

43 This is a new policy.

44 **Why have the alternative options been discounted?**

45 With a changing climate, we are likely to experience more instances of hot weather. So it
46 will be important to design buildings and the public realm with shade and cooling in mind.
47 As such, a policy is considered prudent. There may be some building regulations in place,
48 but this policy complements them.

49 **UN Sustainable Development Goals check**

50 This policy meets these [UN SD Goals](#):

11 SUSTAINABLE CITIES
AND COMMUNITIES



13 CLIMATE
ACTION



Sustainability Appraisal

SA objectives:

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- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy:

		A: Preferred Option	B: No specific policy	
ENV1			The impacts are uncertain. That being said, if there is no policy that does not seek to consider shade and cooling and building regulations are not in place for all types of buildings, the current situation will continue.	
ENV2				
ENV3	+	Green roofs and walls will benefit biodiversity.		?
ENV4				
ENV5	+	Policy seeks to adapt and be resilient to a changing climate.		?
ENV6				
ENV7				
ENV8				
ENV9				
ENV10	+	The policy will result in well designed places.		?
ENV11				
ENV12				
SOC1	+	A key benefit of providing shade and cooling is to health and wellbeing.		?
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				

Renewable Energy Topic Paper

February 2024

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1. Introduction

This Topic Paper discusses the various types of renewable energy, their appropriateness in the Broads and outlines the proposed approach to this issue. This Topic Paper will inform policy in the emerging Local Plan for the Broads.

2. What the NPPG says

The NPPG says that:

Local planning authorities are responsible for renewable and low carbon energy development of 50 megawatts or less installed capacity (under the Town and Country Planning Act 1990). Renewable and low carbon development over 50 megawatts capacity are currently considered by the Secretary of State for Energy under the [Planning Act 2008](#), and the local planning authority is a statutory consultee. It is the government's intention to amend legislation so that all applications for onshore wind energy development are handled by local planning authorities. Microgeneration is often [permitted development](#) and may not require an application for planning permission.

Paragraph: 002 Reference ID: 5-002-20150618

When drawing up a Local Plan local planning authorities should first consider what the local potential is for renewable and low carbon energy generation. In considering that potential, the matters local planning authorities should think about include:

- the range of technologies that could be accommodated and the policies needed to encourage their development in the right places;*
- the costs of many renewable energy technologies are falling, potentially increasing their attractiveness and the number of proposals;*
- different technologies have different impacts and impacts can vary by place;*
- the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver.*

Paragraph: 003 Reference ID: 5-003-20140306

This Topic Paper brings together literature on renewable energy in general as well as relating specifically to the Broads Authority Executive Area.

3. Renewable Energy Solutions in the Broads

In 2013 the Broads Authority commissioned a study to review renewable energy solutions in the Broads (Hickey, 2013). The study concluded that:

'The most efficient and immediate solution for renewable energy generation in the Broads is a combination of GSHP (Ground Source Heat Pumps), ASHP (Air Source Heat Pumps), SG (Solar Greenhouses) and AD-CHP (Anaerobic Digestion Combined Heat and Power). SG or integrated

amorphous technology (thin film a-Si) or Solar Slates offer the best form of domestic electricity generation taking the aesthetic constraints of the Broads into consideration.'

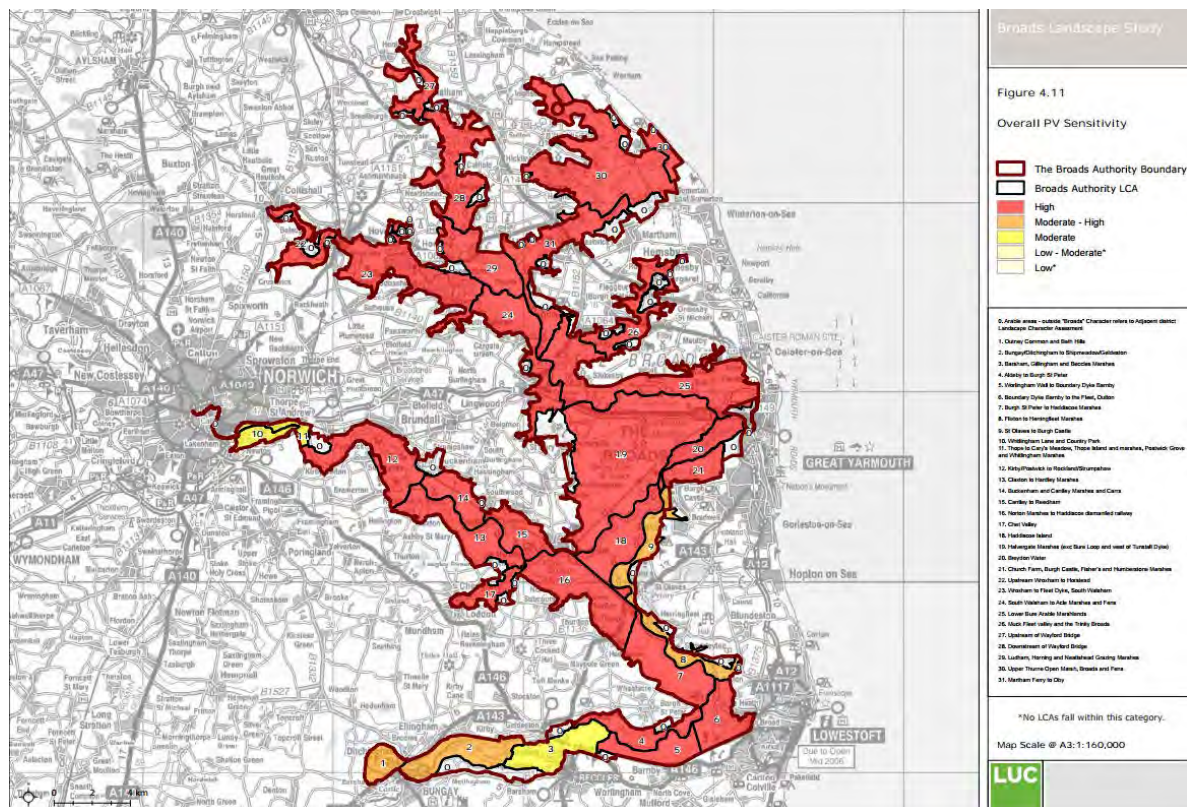
4. Solar panels and solar farms

In 2012 the Broads Landscape Sensitivity Study (2012) assessed the impact of solar photovoltaics on roofs (panels) as well as in fields (farms). The following maps are set out below:

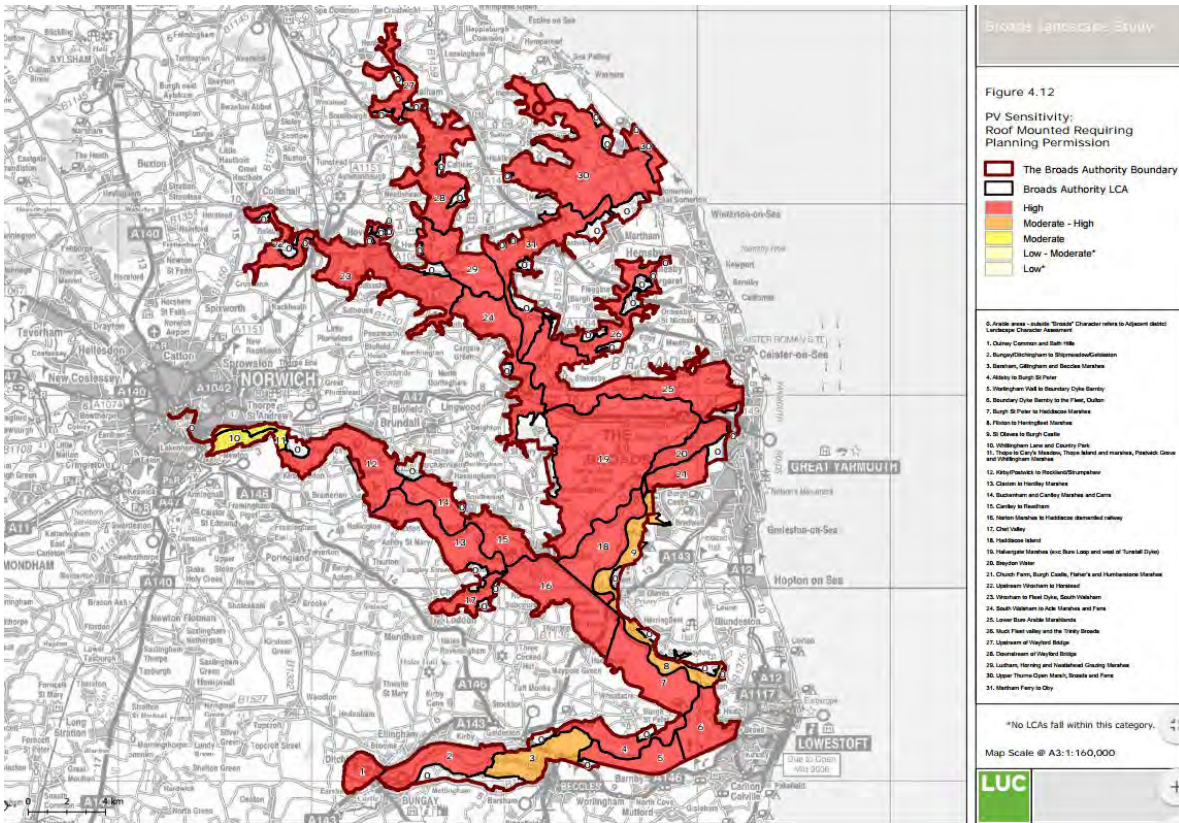
- Figure 4.11: Solar PV – overall landscape sensitivity
- Figure 4.12: Sensitivity to roof mounted solar PV requiring planning permission
- Figure 4.13: Sensitivity to roof mounted solar PV of up to 1 hectare area
- Figure 4.14: Sensitivity to small scale field mounted solar PV of up to 1 hectare area
- Figure 4.15: Sensitivity to medium scale field mounted solar PV of 1-5 hectares area

4.1 Solar PV

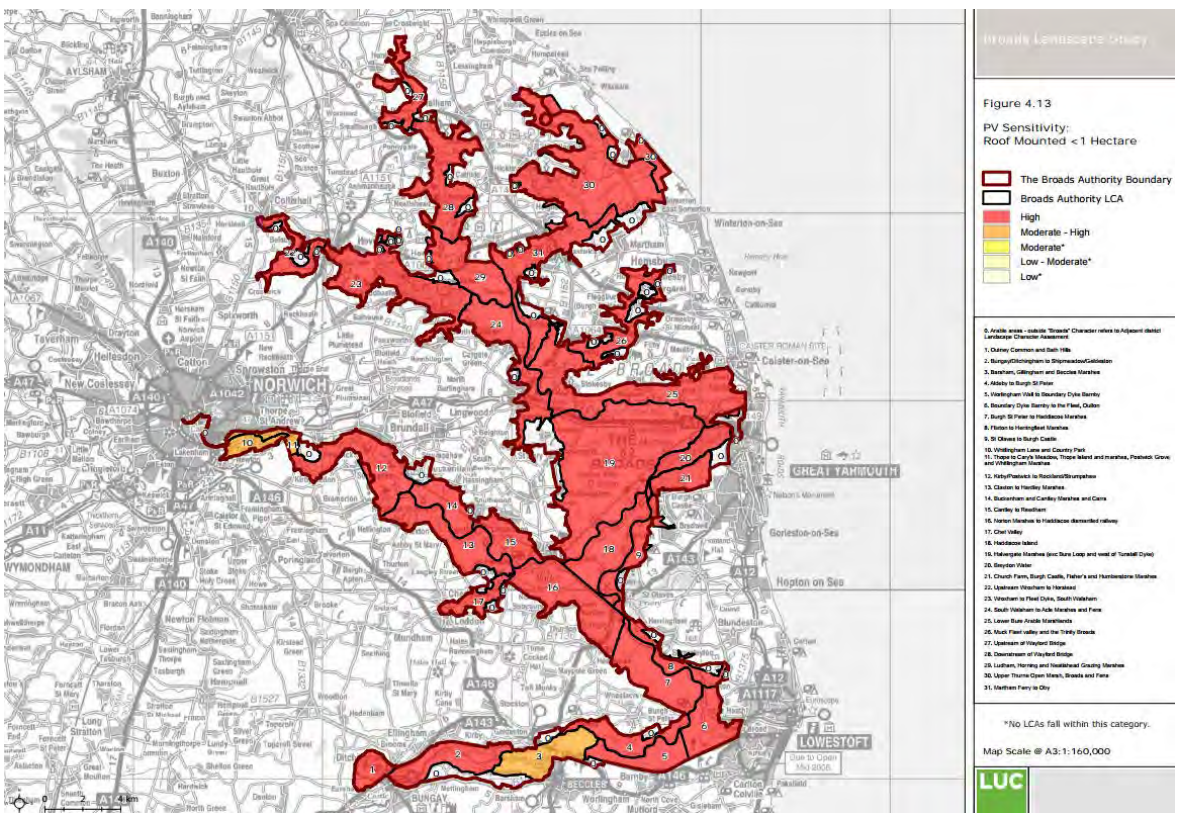
It can be seen from the assessment on the maps that the Broads landscape's sensitivity to solar PV tends to be fairly high, both in terms of landscape character and representation of special qualities. Reflecting these attributes, the assessment has found that there are no landscapes in the Broads which score low or moderate-low to the development of solar PV schemes. This applies to both domestic schemes where planning permission is required and commercial schemes.



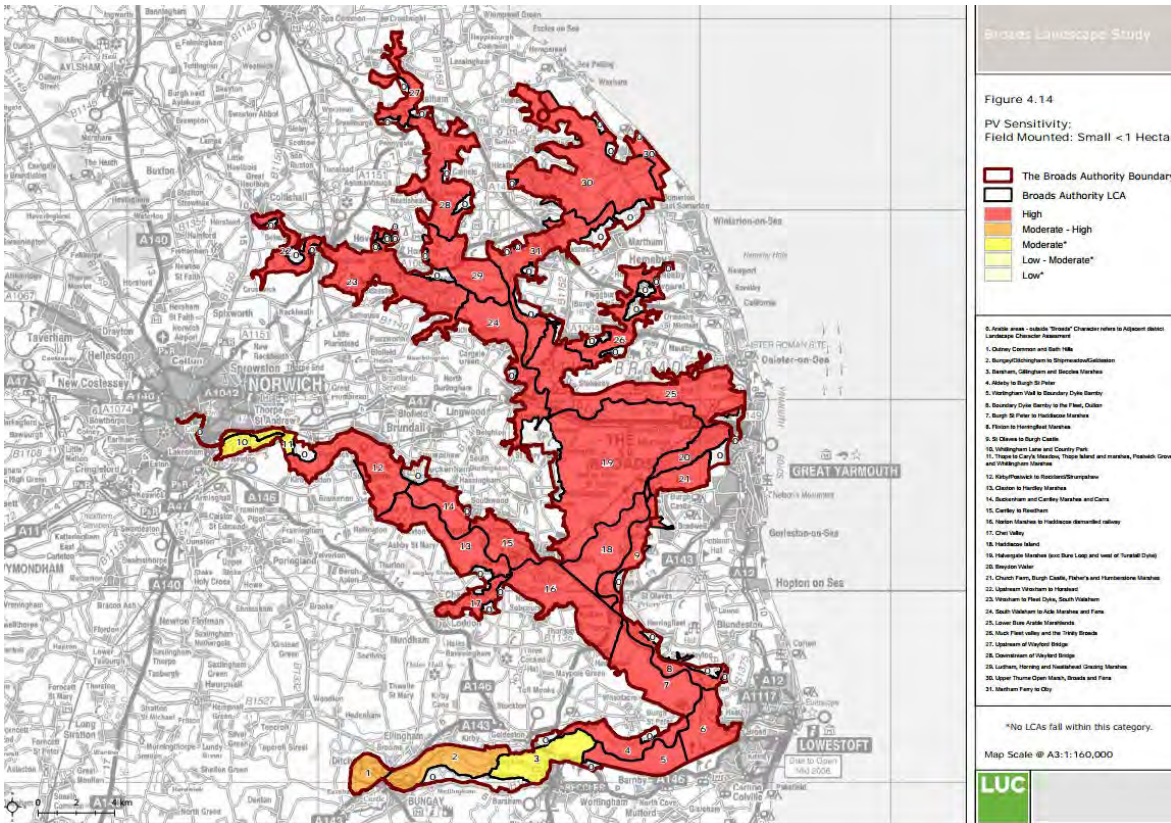
Map 1: Solar PV – overall landscape sensitivity



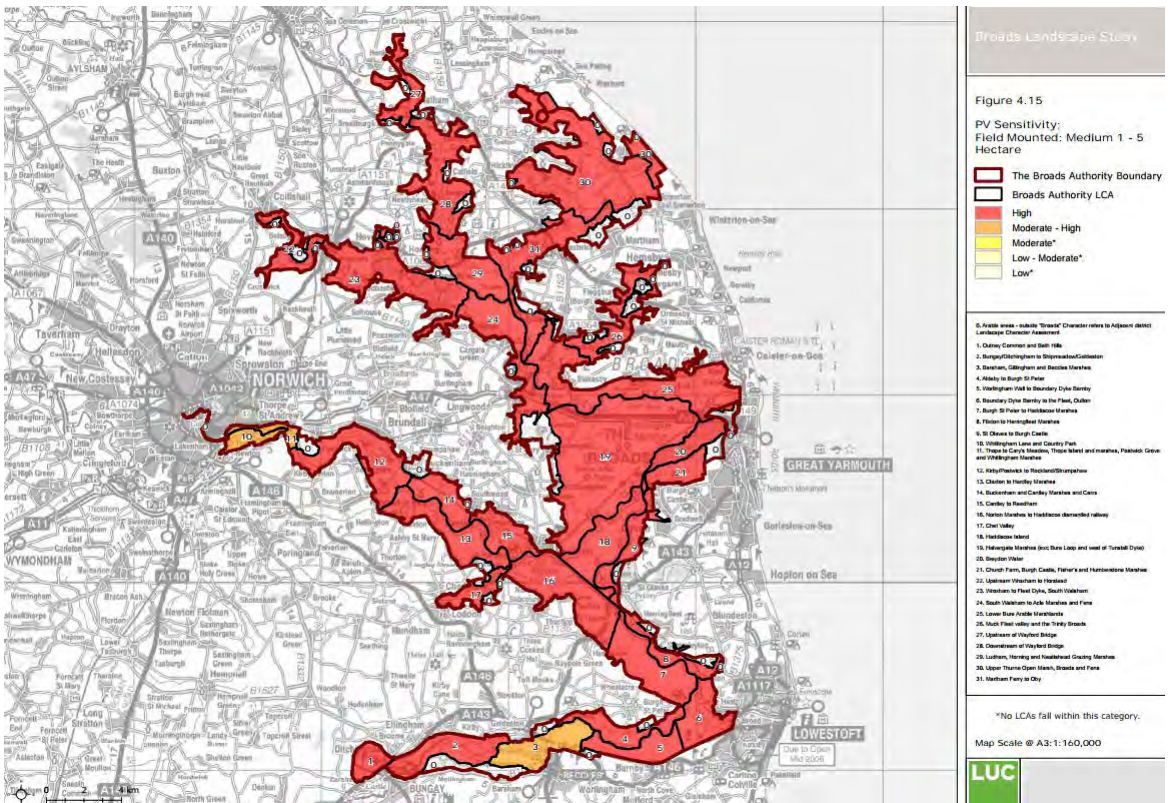
Map 2: Sensitivity to roof mounted solar PV requiring planning permission



Map 3: Sensitivity to roof mounted solar PV of up to 1 hectare area



Map 4: Sensitivity to small scale field mounted solar PV of up to 1 hectare area



Map 5: Sensitivity to medium scale field mounted solar PV of 1-5 hectares area

4.2 Solar tiles and slates in the Broads

Solar tiles or solar slates are mounted on the roof, in place of the roof tiles. Being integrated into the roof of buildings, as well as potentially of a similar colour to the roof tiles, they can have less of an impact on the street scene and landscape than larger panels which are mounted on the roof tiles. In comparison to solar panels they may be considered appropriate on Listed Buildings or in Conservation Areas.

5. Battery storage capacity¹

The application areas discussed here were determined by examining the applications of battery storage most directly related to wind and solar PV power integration. Batteries can be deployed to aid the integration of renewable energy, especially solar and wind power. These are variable renewable energy sources as the energy produced fluctuates depending on the availability of the resource.

Any deployment of battery storage is highly likely to be closely associated with either solar energy systems or wind energy, and therefore the suitability would be restricted to where these technologies would be considered appropriate, please see sections 3 and 10.

6. Heat pumps

There are three types of heat pumps currently available, Air Source Heat Pumps (ASHP), Ground Source Heat Pumps (GSHP) and Water Source Heat Pumps (WSHP).

6.1 Air Source Heat Pumps

An ASHP can offer a full central heating solution and domestic hot water up to 60 degrees. They are significantly easier to install than a GSHP, given no excavation or heavy machinery is required. The installation of a ASHP benefits from permitted development rights within the curtilage of a dwellinghouse or a block of flats (subject to conditions).

6.2 Ground Source Heat Pumps

They utilise the same principle methods as ASHP but require a degree of ground works to lay the necessary cables. The installation, alteration or replacement of a microgeneration ground source heat pump within the curtilage of a dwellinghouse or a block of flats benefits from permitted development rights.

6.3 Water source heat pumps

Water source heat pumps at a microgeneration scale would benefit from permitted development rights if they are located within the curtilage of a dwellinghouse. As the required water source is unlikely to be considered as part of the curtilage of a dwelling there would be limited opportunities for permitted development rights to be implemented. It is highly likely that planning permission would be required for WSHP.

¹ Go here for more information: http://www.irena.org/documentdownloads/publications/irena_battery_storage_report_2015.pdf
[Battery Storage for Renewables Market Status and Technology Outlook \(irena.org\)](http://www.irena.org/publications/2015/Battery-Storage-for-Renewables-Market-Status-and-Technology-Outlook)

Water source heat pumps have not been widely adopted and are relatively new form of renewable energy in comparison to solar and wind. Further research would be required into the potential impacts that the required network of piping would have on navigation, dredging and biodiversity.

The Authority is aware that Norwich City Council have permitted and installed a water source heat pump in the River Wensum, but say that it is still too new to have learnt lessons/feedback on at the moment.

7. Anaerobic digestion combined heat and power

Constructing an AD-CHP plant would require a 1 – 1.5 hectare site, which needs to balance minimising transmission losses to domestic units, and ease of access to raw organic waste. These would be best sited on existing agricultural units.

Biomass renewable energy generation in the Broads can be used in conjunction with the findings of the GHG (Greenhouse Gas) reduction strategy as presented by the University of East Anglia in May 2010 (University of East Anglia, Broads Authority. Towards a GHG Reduction Strategy for the Broads – Identifying and Prioritising Actions)). This report has highlighted that the primary asset for both electricity generation and GHG reduction is farm waste. Renewable energy generation reduces the net GHG of the region by displacing emissions that would be produced by fossil fuel sources. By using the waste assets of the land, GHG is offset and electricity is generated. Biomass assets of the land include –

- Fen, Wetland Vegetation
- Reed Beds
- Scrub
- Mixed Organic Waste
- Slurry
- Woodland

8. Reed as biomass

A 2010 study² investigated options for use of harvested fen. The aim of this report was to identify how fen harvesting could be made sustainable by finding a productive and hopefully commercial end-use for the arisings. Two of the most viable options are:

- The products of pyrolysis include biodiesel and biochar. The latter is an almost pure form of carbon with a wide range of uses. All fen products can be pyrolysed, although the technology is currently at an early stage of development.
- Combustion fuels. These include woodchips, bales of scrub, and reed pellets. The first two are well established processes. Consideration of reed pellets formed the majority of the report.

² [New Opportunities For The Sustainable Management Of Fens: Reed Pelleting, Composting And The Productive Use Of Fen Harvests \(broads-authority.gov.uk\).](https://www.broads-authority.gov.uk/new-opportunities-for-the-sustainable-management-of-fens-reed-pelleting-composting-and-the-productive-use-of-fen-harvests)

As a 2023 update:

- Reed is unlikely to be economically viable as a biomass pellet or brickette energy source in the Broads due to the production difficulties and costs involved.
- Biochar from reed is of interest as a carbon sequestration project rather than an energy source.

9. Hydro

Although the Broads is largely characterised by low-lying wetland and flood plains, there is a potential to extract energy from hydroelectricity. Some of the hydrodynamic assets of the Broads are tidal (River Yare) and weirs. The River Yare provides a tidal current, which could accommodate a tidal barrier / energy harvester. As regards potential weirs for small-scale hydro electricity, three potential sites have been identified:

- Bungay - 52°27'23.25"N 1°26'36.95"E
- Pirnhow - 52°27'29.82"N 1°27'26.39"E
- Mill Pool Lane - 52°28'16.95"N 1°28'46.97"E

10. Wind Energy in the Broads

There is a separate topic paper that looks into wind energy in the Broads. It concludes that due to landscape impacts, no areas should be identified as suitable for wind power in the Broads. [See <<Wind Topic Paper>>](#).

11. Summary

- Solar – roof mounted solar and solar farms can have a landscape impact on the Broads. Solar slates or tiles may be more acceptable.
- Battery storage – Any deployment of battery storage is highly likely to be closely associated with either solar energy systems or wind energy, and therefore the suitability would be restricted to where these technologies would be considered appropriate, please see sections 3 and 10.
- Heat pumps – all types of heat pumps may be suitable in the Broads, depending on the specifics of the site.
- Anaerobic digestion – would best be sited on existing agricultural units and would need to consider landscape impacts.
- Reed as biomass – Reed is unlikely to be economically viable as a biomass pellet or brickette energy source in the Broads due to the production difficulties and costs involved.
- Hydro – hydro may be suitable in some parts of the Broads.
- Wind – as concluded in the separate Wind Topic Paper, no areas are considered suitable for onshore wind.

12. Draft policy

The following draft policy and supporting text is proposed.

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy PODM15: Renewable and low carbon energy

1. Renewable/low carbon energy proposals shall be of a scale and design appropriate to the locality and shall not, either individually or cumulatively, have an adverse impact on the distinctive landscape, cultural heritage, biodiversity, recreational experience or special qualities of the Broads or the local amenity³. The Broads Landscape Sensitivity Study⁴ (or successor document) will provide guidance on this. The impact of ancillary infrastructure, including power lines, onshore infrastructure for offshore wind turbines/farms, sub-stations, storage buildings, wharves and access roads, will form part of the evaluation.
2. Wherever possible, renewable energy proposals should utilise previously developed sites and result in environmental improvements over the current condition of the site.
3. The developer will also be required to to restore the land to its original use and remove any renewable energy equipment when it is redundant.
4. Proposals for solar farms on agricultural land are required to use poorer quality agriculture land.
5. Battery storage proposals will need to address relevant policy considerations, such as landscape impact and impact on the special qualities of the Broads.

Reasoned Justification

It is widely acknowledged that tackling the challenges posed by climate change will necessitate a radical increase in the proportion of energy generated from renewable sources. The UK

³ For example through: visual dominance, noise, fumes, odour, vibration, glint and glare, shadow flicker traffic generation, broadcast interference

⁴ ~~Landscape Sensitivity Study (2012): www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-sensitivity-studies~~ Landscape Sensitivity Study (broads-authority.gov.uk)

20 Renewable Energy Strategy (2009) includes the UK’s legally binding renewable energy target of
21 15% by 2020⁵. This is part of a wider suite of strategies within the UK Low Carbon Transition Plan.
22 The Authority must ensure that the causes of climate change are addressed at the local level. This
23 will, however, need to be undertaken within the context of the special circumstances pertaining to
24 the Broads.

25 Landscape impact of proposals

26 A range of renewable energy technologies may be suitable for the Broads, including solar
27 photovoltaic cells, ground and water and air source heat pumps and wind turbines⁶. However, the
28 sensitivity of the Broads landscape means that large-scale renewable energy developments are
29 generally inappropriate. Where wind turbines, solar photovoltaics cells or other large-scale
30 renewable energy developments are proposed, applications should be accompanied by a
31 landscape and visual impact assessment of the impact of the development from a full range of
32 viewpoints, including from the waterways, and is completed in accordance with the Guidelines for
33 Landscape and Visual Impact Assessment published by the Landscape Institute and Institute of
34 Environmental Management and Assessments⁷.

35 Wind turbines

36 The NPPF ~~2019~~ 2023 ~~(paragraph 154 footnote 49) says ‘Except for applications for the repowering~~
37 ~~of existing wind turbines, a proposed wind energy development involving one or more turbines~~
38 ~~should not be considered acceptable unless it is in an area identified as suitable for wind energy~~
39 ~~development in the development plan; and, following consultation, it can be demonstrated that~~
40 ~~the planning impacts identified by the affected local community have been fully addressed and the~~
41 ~~proposal has their backing’.~~ (paragraph 158, footnote 54) says: ‘Except for applications for the
42 repowering and life-extension of existing wind turbines, a planning application for wind energy
43 development involving one or more turbines should not be considered acceptable unless it is in an
44 area identified as suitable for wind energy development in the development plan or a
45 supplementary planning document; and, following consultation, it can be demonstrated that the
46 planning impacts identified by the affected local community have been appropriately addressed
47 and the proposal has community support’.

48 The Landscape Sensitivity Study concluded that wind turbines are tall structures that have the
49 potential to detract from the mainly open and low-lying character of the Broads landscape,
50 particularly when they are in large groups or sited in prominent locations. The **Wind Energy Topic**
51 **Paper** assesses the potential for wind turbines in the Broads and does not identify specific areas of
52 suitability within the Broads Authority Executive Area for wind turbines and as such no areas are
53 identified in this Local Plan.

⁵ Since that Strategy, the UK Government have committed to net zero by 2050.

⁶ See Renewable Energy Topic Paper **xxxx**

⁷ Guidelines for Landscape and Visual Impact Assessment: www.landscapeinstitute.org/product/guidelines-for-landscape-and-visual-impact-assessment/

54 Any deployment of battery storage is highly likely to be closely associated with either solar energy
55 systems or wind energy, and therefore the suitability would be restricted to where these
56 technologies would be considered appropriate.

57 **Renewable/low carbon proposals outside of the Broads**

58 The Authority will not support proposals for renewable energy development that are sited outside
59 but close to the Broads executive boundary that would have an adverse impact on the Broads
60 environment, the special qualities of the Broads and the special landscape setting and character.

61 **Reasonable alternative options**

- 62 a) No policy
- 63 b) Original policy

64 **Sustainability appraisal summary**

65 The three options (of having a policy and not having a policy and the amended policy) have been
66 assessed in the SA. The following is a summary.

A: Policy – Preferred Option	11 positives. 0 negatives. 1 ? Overall, positive.
B: No policy	0 positives. 0 negatives. 12 ?
C: Original policy	11 positives. 0 negatives. 1 ? Overall, positive.

67 In terms of wind specifically, the option of identifying areas for wind has also been assessed:

D: Identify areas for wind	6 positives. 2 negatives. 1 ?
----------------------------	-------------------------------

68 **How has the existing policy been used since adoption in May 2019?**

69 According to recent Annual Monitoring Reports, the policy has not been used.

70 **Why have the alternative options been discounted?**

71 The amendments follow the Planning Policy for Traveller Site as well as well as referring to
72 nutrient enrichment, recreation impacts and biodiversity considerations and is favoured as it
73 updates the policy and provides more detail.

Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

	A: Amended policy		B: No policy	C: Original policy		D: identifying areas suitable for wind	
ENV1							
ENV2							
ENV3	+	Impact on the special qualities of the Broads is included in the policy, including the natural environment.	?	+	Impact on the special qualities of the Broads is included in the policy, including the natural environment.	-	There is a link between bird collisions and wind turbines.
ENV4	+	Impact on the special qualities of the Broads is included in the policy, including the landscape.	?	+	Impact on the special qualities of the Broads is included in the policy, including the landscape.	-	The Broads is sensitive to the various sizes of turbines (from moderate to high sensitive).
ENV5	+	The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.	?	+	The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.	+	The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.
ENV6							
ENV7	+	Seeks use of previously developed land for proposals if possible.	?	+	Seeks use of previously developed land for proposals if possible.		
ENV8	?	If the scheme is for Anaerobic Digestion, this would use waste materials.	?	?	If the scheme is for Anaerobic Digestion, this would use waste materials.		
ENV9	+	Impact on the special qualities of the Broads is included in the policy, including heritage assets.	?	+	Impact on the special qualities of the Broads is included in the policy, including heritage assets.	?	Depending on the location, there could be potential for wind turbines to affect heritage assets.
ENV10	+	Fundamentally, the policy taken together means that any scheme is designed appropriately for the area.	?	+	Fundamentally, the policy taken together means that any scheme is designed appropriately for the area.		
ENV11	+	The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.	?	+	The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.	+	The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.
ENV12	+	Fundamentally, the policy relates to renewable and low carbon energy generation.	?	+	Fundamentally, the policy relates to renewable and low carbon energy generation.	+	Fundamentally, wind is a renewable and low carbon energy generation.
SOC1							
SOC2							
SOC3							
SOC4							
SOC5							
SOC6							
SOC7							
ECO1	+	The policy enables appropriate renewable and low carbon energy schemes that could benefit businesses in the area.	?	+	The policy enables appropriate renewable and low carbon energy schemes that could benefit businesses in the area.	+	Allowing wind could benefit businesses in the area.
ECO2	+		?	+			
ECO3	+		?	+			

Wind Energy Topic Paper

February 2024

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1. Introduction

This Topic Paper addresses the approach taken by the Broads Authority in relation to allocations for wind turbines. It discusses national policy and the evidence already available in relation to wind energy in the Broads Authority Executive Area. This updates and amends the 2015 paper used to support the current Local Plan (2019).

2. What the NPPG says

The NPPG says:

‘The [Written Ministerial Statement](#) made on 18 June 2015 is quite clear that when considering applications for wind energy development, local planning authorities should (subject to the transitional arrangement) only grant planning permission if:

- the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

Whether the proposal has the backing of the affected local community is a planning judgement for the local planning authority.’

3. RSPB and Natural England work relating to birds

In 2009 RSPB and Natural England commissioned a GIS map and written guidance to aid the planning process for onshore wind energy development in England. The map is based on distributional data for twelve sensitive bird species, plus statutory SPAs (Special Protection Areas), and sites containing nationally important populations of breeding waders and seabirds, or wintering waders or wildfowl.

The map indicates a greater incidence of bird sensitivities in coastal and estuarine areas and upland areas in the north of England. The Broads Executive Area is generally rated as having a high sensitivity with some areas of medium sensitivity (see inset map, zoomed into the Broads area).

The RSPB were contacted in December 2023 about this study to understand if it was still the current position. The RSPB said:

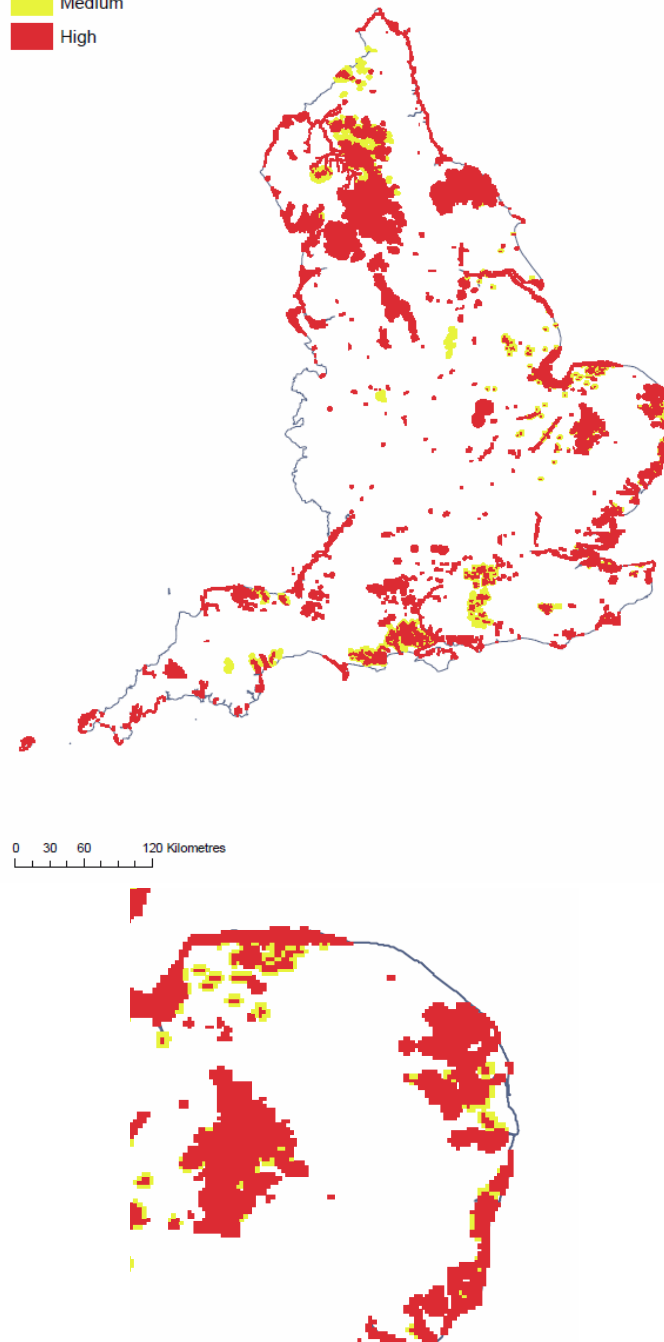
‘RSPB supports the aims to provide more of our energy needs from renewable sources.

But where there will likely be disturbance to bird populations (from construction and maintenance operations), as a result of loss of habitat, or from collision with turbine blades or towers we would likely object.

Geese and ducks migrating and moving between sites, along with species like crane and other species which fly within the range of ‘top blade height and ground’ are highly susceptible. This can include species like marsh harrier, swans and swift as well as others can also be affected’.

Sensitivity rating

- Unknown
- Medium
- High



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© Crown Copyright and database right [2009]. Ordnance Survey licence number 100022021.

Figure 1. Map of sensitive bird areas in relation to onshore wind farms in England.
Based on the highest sensitivity rating, for any of the species or sites included, in each constituent 1-km square.

4. Issues and Options consultation

One of the issues discussed in the Issues and Options consultation related to wind. [Appendix 1](#) shows the section and related question in the Issues and Options document and [Appendix 2](#) shows the responses.

5. Broads Landscape Sensitivity Study (2012)

The Broads Authority has a [landscape sensitivity study](#) relating to wind power (and solar farms). This study has identified the sensitivity of the Broads landscape to wind turbines and provides guidance for new development. It concludes that for turbines above 20m, the entire Broads Authority Executive area is highly sensitive. For turbines shorter than 20m, most of the Broads has moderate to high sensitivity, some has high sensitivity and a small area has moderate sensitivity.

Landscape Areas 10 and 11 are assessed as having moderate sensitivity to small (0-20m) and medium (20-50m) single turbines in the Broads Executive Area. Area 10 is Whitlingham Lane and County Park and area 11 is Thorpe to Cary's Meadow, Thorpe Island and Marshes, Postwick Grove and Whitlingham Marshes. The study concludes for these areas: 'Overall landscape sensitivity of this area group to wind turbines is moderate. This is due to the disjointed landscape pattern and historic character (severances created by large scale settlement edges and by transport corridors such as the Norwich Bypass), the degree of visual containment created by valley sides and woodlands and the presence of large scale settlement edge influences to area 10 in particular. Against this are balanced sensitive features such as relict historic landscape patterns created by parkland as at Whitlingham and Trowse Newton, and the sense of tranquillity within Whitlingham Country Park and the Great Broad'.

The rest of this Topic Paper further investigates the potential for the areas 10 and 11 to accommodate wind power.

6. Using Existing Mills in the Broads

The restoration and re-use of disused mills is likely to be more acceptable in the Broads than modern wind turbines. These features are part of the cultural landscape already and some are redundant and in need of repair. So by improving these mills such heritage assets will be maintained in working order and could generate renewable energy. That being said, the traditional design of mills is not the most effective for requirements of electricity generation. The existing building would need to be restored and adapted. Many buildings do not have electricity near to them and would therefore require much infrastructure work to facilitate electricity transfer and the ongoing maintenance is likely to be onerous. Finally, many mills would have to be renovated to extract enough electricity to feed a populated area.

Studies conclude that it is approximately 93% more expensive to restore each kWh of wind energy in comparison to generating each kWh of energy from a new anaerobic digestion plant. (Watson, Thomson, Clayton, Scott May 2005)¹.

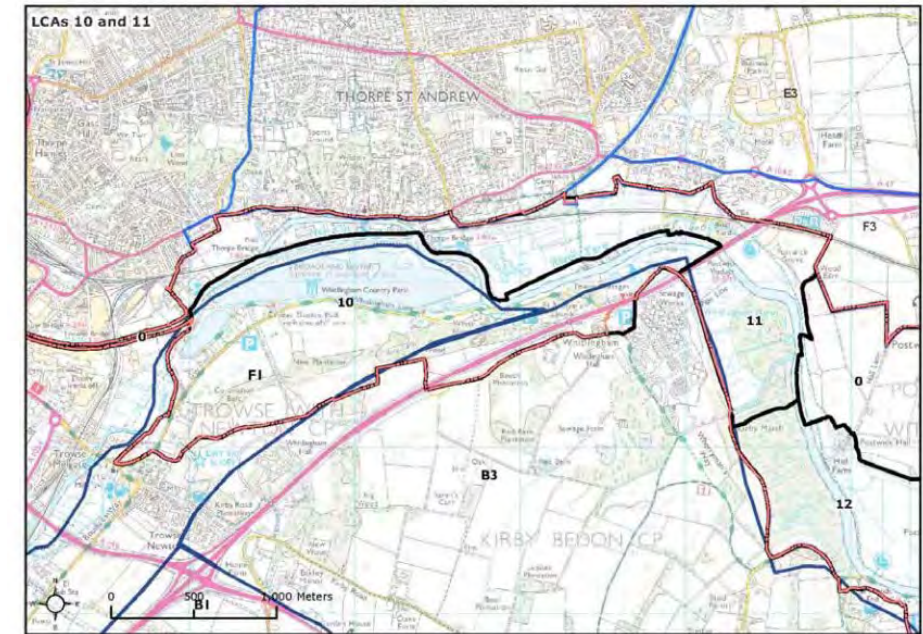
¹ [Possibility of converting unmanned former wind-pumps to produce electricity with computer control: a feasibility study – The Mills Archive](#), [Feasibility Study: Generating Electricity From Traditional Windmills | PDF | Wind Power | Transmission \(Mechanics\) \(scribd.com\)](#) and Scott, M. Conserving the Drainage Mills of the Norfolk Broads – Assessing the Appropriateness of Adapting the Historic Machinery to Generate Electricity – May 2005

The following maps show the Landscape Sensitivity Assessment for Wind Turbines for Area 10 and Area 11.

Sensitivity Level	Definition
High	The key characteristics and qualities of the landscape are highly sensitive to change from the type and scale of renewable energy being assessed.
Moderate – High	The key characteristics and qualities of the landscape are sensitive to change from the type and scale of renewable energy being assessed.
Moderate	Some of the key characteristics and qualities of the landscape are sensitive to change from the type and scale of renewable energy being assessed.
Low – Moderate	Few of the key characteristics and qualities of the landscape are sensitive to change from the type and scale of renewable energy being assessed
Low	Key characteristics and qualities of the landscape are robust and are less likely to be adversely affected by the type and scale of renewable energy development being assessed

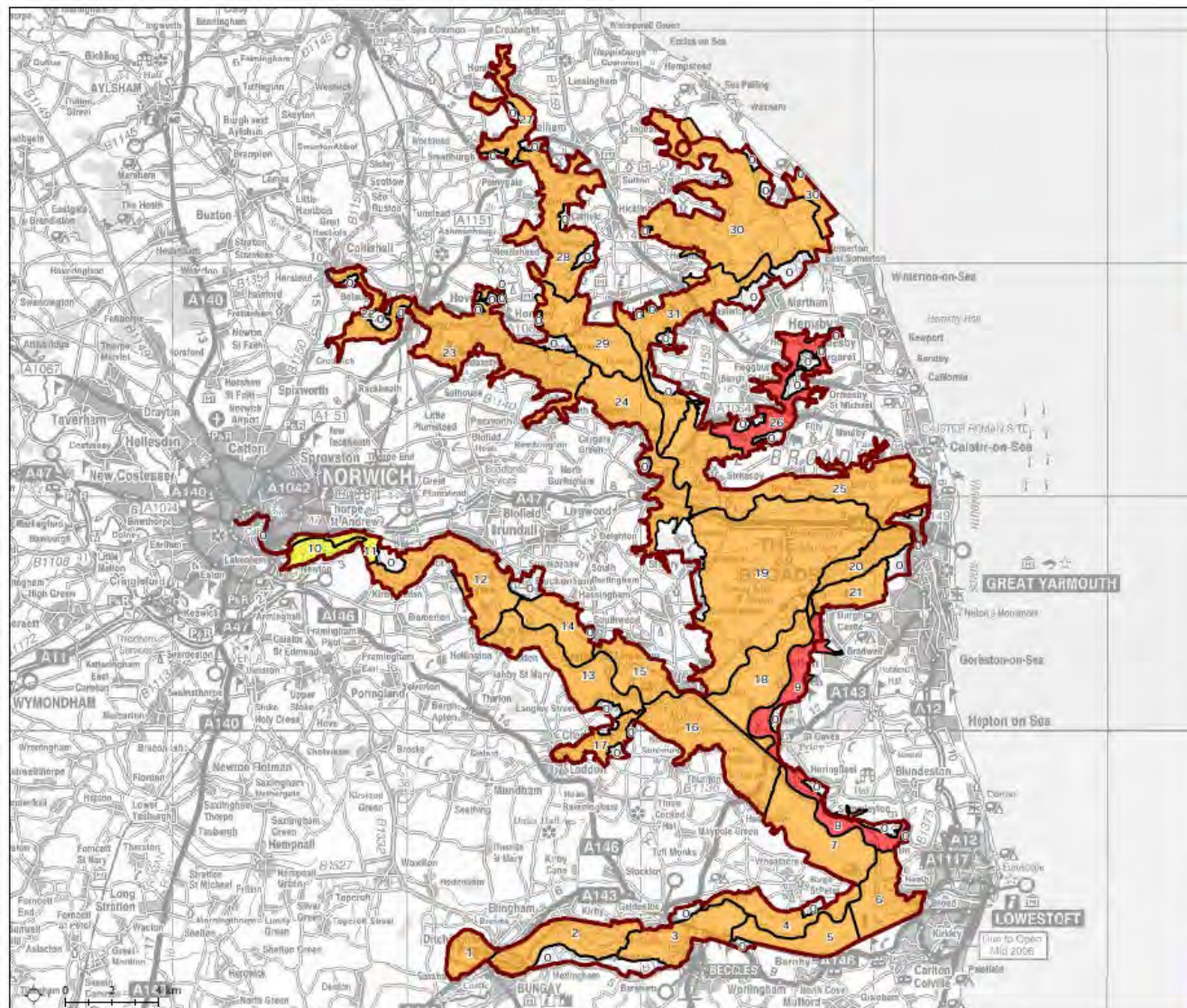
The Landscape Sensitivity Study defines turbine size as

- small turbines - 0-20m height

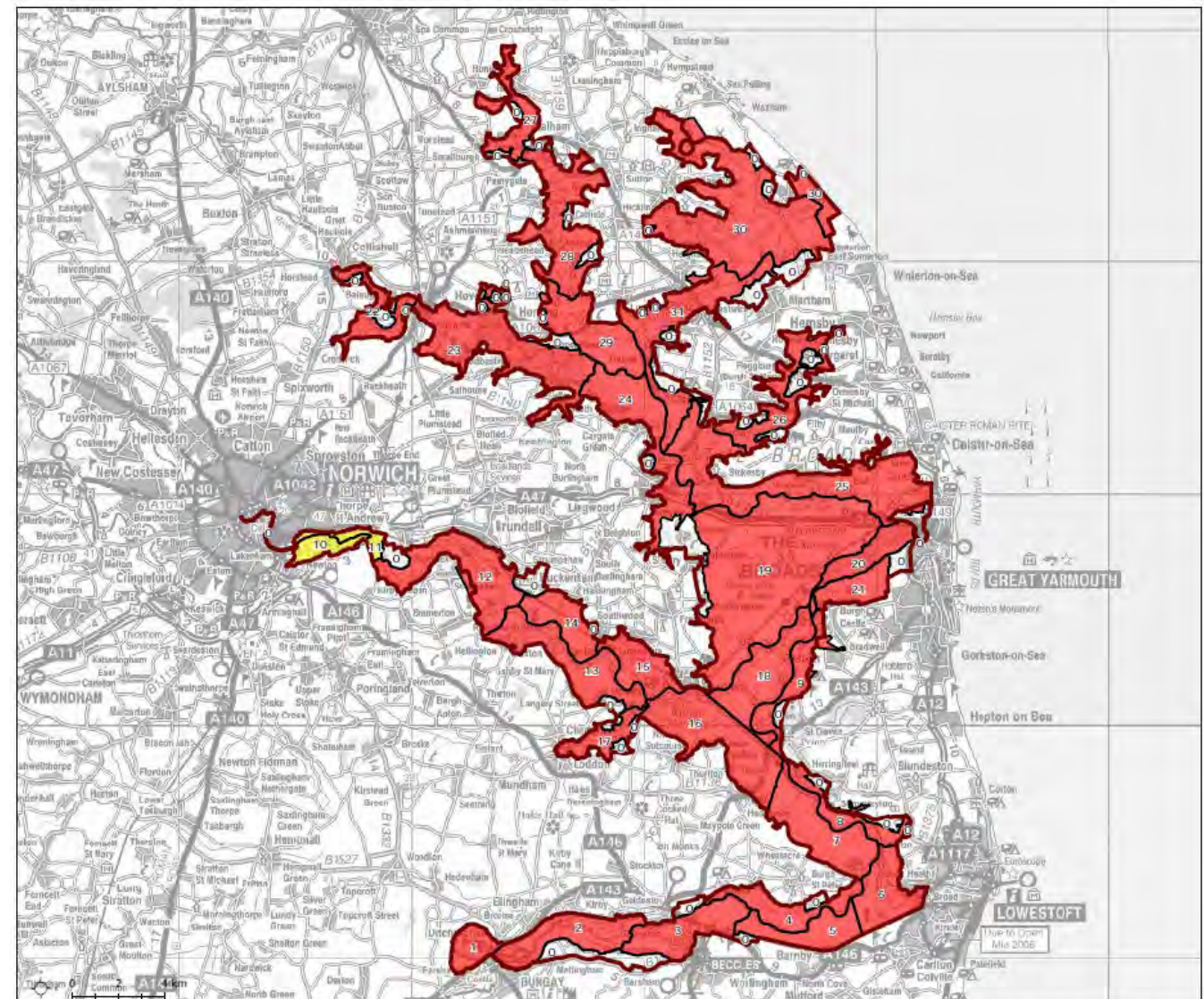


Map 1: showing Areas 10 and 11.

Map 2: Landscape Sensitivity to Small Turbines (0-20m)



Map 3: Landscape Sensitivity to Medium Turbines (20-50m)



7. Wind Speed

No specific work has been completed to assess wind speed to inform this topic paper. The Rensmart website² gives an indication of wind speed. Typical wind speeds for the Whitlingham area (areas 10 and 11 of the landscape sensitivity study) are set out in the table below.

Height Above Ground	Wind Speed
At 10 metres	4.7 to 5.3 m/s
At 25 metres	5.6 to 5.7 m/s
At 45 metres	6.1 to 6.3 m/s

It is important to note that a site's suitability for wind turbines reflects the specifics of the site (for example a tree to the southwest of the site is likely to impact efficient energy generation) as well as the economics (for example in 2020, the Government lifted the block on onshore renewable energy subsidies).

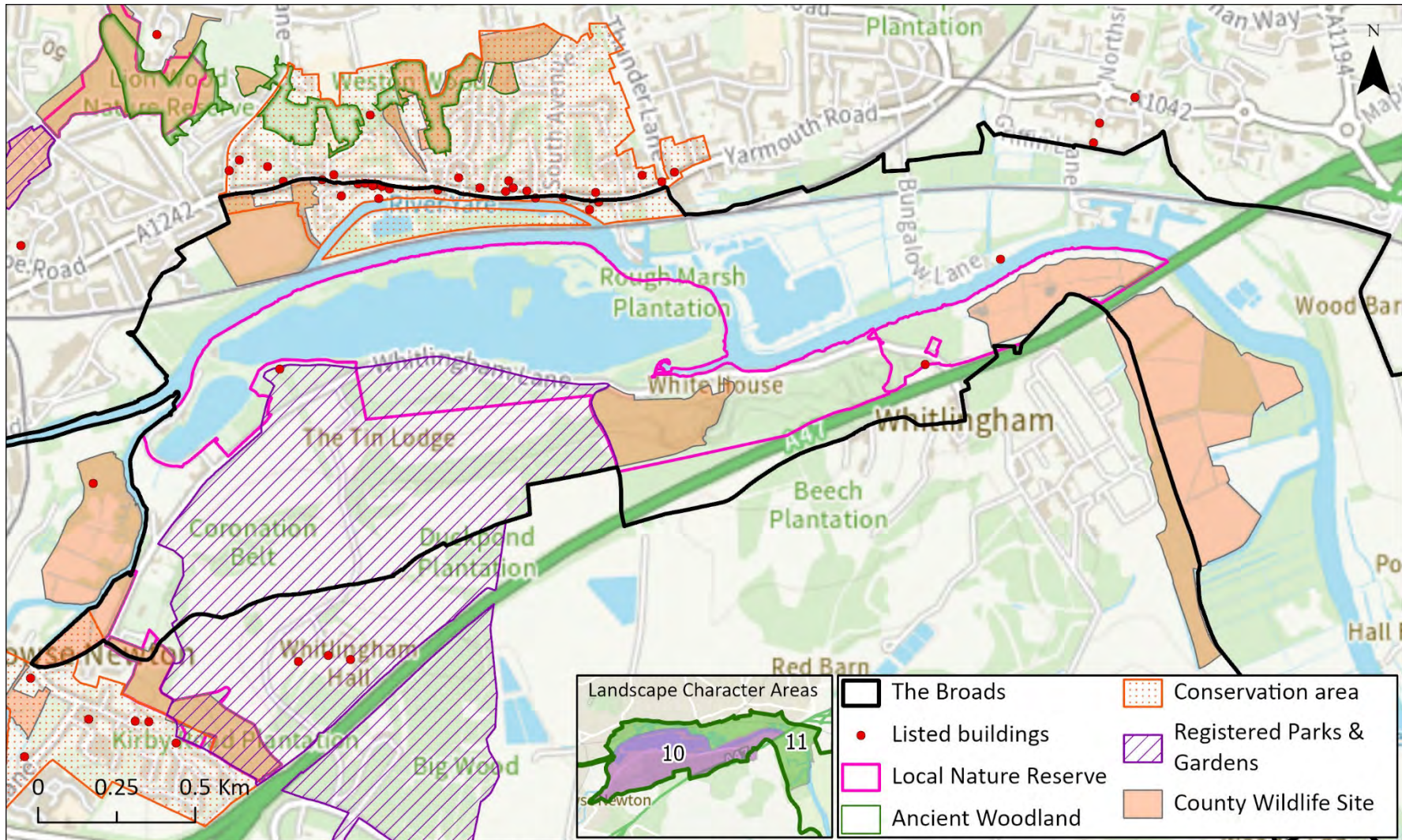
² This interactive map gives estimated wind speed for each square kilometre of the UK. The data is taken from the NOABL wind database. The BERR Wind Speed Database is the result of an air flow model that estimates the effect of topography on wind speed. There is no allowance for the effect of local thermally driven winds such as sea breezes or mountain/valley breezes. The model was applied with 1km square resolution and takes no account of topography on a small scale or local surface roughness (such as tall crops, stone walls or trees), both of which may have a considerable effect on the wind speed. The data can only be used as a guide and should be followed by on-site measurements for a proper assessment. <https://www.rensmart.com/>

8. Constraints in Areas 10 and 11

The following maps show landscape features and designations in Areas 10 and 11.



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Summary

If single small and medium wind turbines were placed in the Trowse and Thorpe St Andrew area on the outskirts of Norwich, there would be a **moderate impact on landscape sensitivity**. This means that some of the key characteristics and qualities of the landscape are sensitive to change from this scale of wind energy.

In the Trowse and Thorpe St Andrew area **wind speeds could be suitable for wind turbines**.

In the Trowse/Thorpe St Andrew area, **there are many existing constraints**. The trees could impact wind speeds and other constraints, such as conservation area, nature reserves, water bodies and listed buildings could impact on where wind turbines could be placed in the ground.

The existing mills of the Broads theoretically provide an ideal location for generating energy from wind. They are already accepted as treasured features of the landscape, they can be in areas with few objects to impact wind speeds and such a use could bring some mills into a better state of repair. That being said, **it could be costly to generate electricity from the existing mills** due to isolation from transmission infrastructure and the cost related to enabling the mills to generate electricity.

9. Conclusion

In conclusion, whilst being rated as having a moderate sensitivity to single small or medium wind turbines, there will still be an impact on key characteristics and qualities of areas 10 and 11. Coupled with the constraints in the area, allocating area 10 and 11 for wind turbines in the Local Plan is not appropriate.

There are opportunities for wind energy generation using the existing mills, albeit at cost. The policies in the Local Plan would be used to assess any such proposals.

Appendix 1: Issues and Options Section on Wind

Introduction

Currently, the National Planning Policy Guidance (NPPG)³ says '[Suitable areas for wind energy development](#) for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan' and also 'In the case of [wind turbines](#), a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan'.

This stance was set out in the [Written Ministerial Statement](#) from June 2015, which says: 'When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:

- the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing'.

The only threshold is 'one or more' and there is no distinction made between commercial and domestic turbines.

It should be noted that there are permitted development rights for domestic microgeneration equipment and these cover the sort of wind turbines that householders might wish to install on their properties. There are certain restrictions within the permitted development rights and there are also criteria that must be met. These permitted development rights, however, do not apply in the Broads so any such proposal will require planning permission.

The [British Energy Security Strategy](#) (April 2022) says 'In the more densely populated England, the Government recognises the range of views on onshore wind. Our plans will prioritise putting local communities in control. We will not introduce wholesale changes to current planning regulations for onshore wind but will consult this year on developing local partnerships for a limited number of supportive communities who wish to host new onshore wind infrastructure in return for benefits, including lower energy bills. The consultation will consider how clear support can be demonstrated by local communities, local authorities and MPs'. The Broads Authority will keep informed of any changes.

Current approach

The current Local Plan does not allocate suitable areas for wind turbines. This approach is based on the evidence set out in the [Renewable Energy Topic Paper \(2016\)](#), which uses the [Landscape Sensitivity Study](#) as a basis; this study looked primarily at commercial scale turbines, rather than domestic microgeneration. The study concluded that most of the Broads is sensitive to wind turbines, with the least impact (low to moderate) being around the Whitlingham Broad area. The Topic Paper then investigated that area specifically, identifying

³ [Renewable and low carbon energy - GOV.UK \(www.gov.uk\)](#)

that much of the area is constrained in terms of its being an historic/registered park and garden, local nature reserve and/or county wildlife site, as well as there being some areas of trees. The Topic Paper concluded that 'whilst being rated as having a moderate sensitivity to single small or medium wind turbines, there will still be an impact on key characteristics and qualities of areas 10 and 11 (Whitlingham Broad area). Coupled with the constraints in the area, allocating areas 10 and 11 for wind turbines in the Local Plan is not appropriate'.

Question 20: Do you have any thoughts on our current approach to wind energy?

What do other Local Planning Authorities do?

The [South Downs National Park Local Plan](#) (2019) does not designate areas for wind turbines, but has Policy SD51 which is supportive of 'small scale' turbines (up to 100Kwh). The [New Forest National Park Local Plan](#) (2020) does not include wind turbines as it was concluded that wind turbines are not suitable, with the evidence base showing that windspeeds are generally low in the New Forest. The [Exmoor National Park Local Plan](#) (2017) identifies some areas (map 5.2 on page 113⁴) for small scale wind turbines. The ~~[North York Moors National Park Local Plan](#)~~ [North York Moors National Park Authority Local Plan](#) (2020), policy ENV8 supports wind turbines in areas set out in a related SPD.

Question 21: Do you have any thoughts on wind turbines and the Broads?

Appendix 2: Responses to Issues and Options section on Wind

Q	Organisation	Comment	Response	Way forward
20	Bradwell Parish Council	Fundamentally we need to look at and use other forms of energy generation including wind other than burning fossil fuel.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced, being aware of any Government policy change.
20	British Sugar/Rapleys	We consider that the current approach to wind energy not to allocate suitable areas for wind turbines is restrictive, as it would effectively rule out wind energy development by existing businesses wishing to reduce carbon emissions from their operations. We note that this approach is based on the Renewable Energy Topic Paper (2016) which focused on commercial scale turbines rather than domestic microgeneration and assessed landscape sensitivities of small scale (up to 20m) and medium scale (20-50m) wind turbines within broad area segments.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced, being aware of any Government policy change.
20	British Sugar/Rapleys	The current approach, which is not based on a site specific assessment, will result in a blanket ban on any size of wind energy developments, including those which are smaller than 20m and/or can be sensitively designed and located. As such, we request that the Local Plan Review process assesses the suitability of wind turbines on a site specific basis where existing businesses are seeking to adapt to climate change and reduce carbon emissions from their existing operations. In the context of the significant industrial development within the Cantley Sugar Factory area, it is considered that wind turbine proposals of appropriate scale and siting could be accommodated without causing significant harm to amenity and views. We therefore consider that an opportunity to reduce carbon emissions should not be overlooked by a blanket ban without site specific considerations.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced as well as policy CAN1 is checked and produced (see comments from British Sugar on CAN1), being aware of any Government policy change.
20	East Suffolk Council	The current approach seems reasonable in relation to commercial scale wind turbines, and East Suffolk welcome the strong link to the Landscape Sensitivity Study which provides an evidence base to justify the position taken. The position regarding small scale turbines is not as clear, and the Broads Authority should consider what additional evidence may be needed in order to support a policy approach in these circumstances.	Noted.	If change approach, consider evidence needed.
20	RSPB	Given the Broads is a favoured location for wintering waterfowl, which move between the continent and then when in the UK between counties and protected sites, wind turbine installation on land would create problems, both on the grounds of potential mortality and impact on landscape character. This also holds true for larger species such as common crane, Eurasian bittern, resident geese and swans, larger birds of prey and large flocks of smaller birds arriving in winter from Europe. Many species could be impacted through striking rotating blades or by having the suitability of favoured foraging, hunting and breeding sites compromised.	Noted.	Ensure consider impact on birds.
21	Bradwell Parish Council	There should be limited expansion of the use of Wind turbines that has limited impact on the environment.	Noted	Consider this comment as produce Preferred Options version of the Local Plan.
21	Broads Society	The Society considers that the current approach of non-allocation should be maintained given the intrinsic value of the Broads specific landscape.	Support for non allocation noted.	Consider this comment as produce Preferred Options version of the Local Plan.
21	Brooms Boats	All technologies must be considered in view of the significant impact facing the Planet.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced

Q	Organisation	Comment	Response	Way forward
21	East Suffolk Council	As set out in our answer to question 20 above, East Suffolk Council would support further assessment of the sensitivity of the Broads Authority area landscape to smaller scale wind turbines. Depending on the outcome of that work, there may be scope to revisit the policy wording to allow for the potential opportunity for small scale turbines, subject to the caveats identified by the 2015 Ministerial Statement which remain relevant.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
21	Mrs S Lowes	Wind energy – Norfolk is flat. Wind turbines on land will detract from the benefit of tourism and locals. Maybe smaller ones there are not on show.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
21	RSPB	As stated in the response for Q20 the Broads is not suited to wind turbines. Other renewables should be prioritised, such as appropriate solar and household heat source. Land to the north of the Broads, which might be considered suitable could prove unsuitable due to the movements of wintering birds between the Broads and north Norfolk coast.	Support for non allocation noted.	Consider this comment as produce Preferred Options version of the Local Plan.

An investigation into the technical issues related to 'do float' and 'can float' homes

Local Plan for the Broads

February 2024

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1 Introduction

As the Local Plan for the Broads is reviewed, there is the opportunity to consider new areas that it could cover and address; buildings that do float or can float is one of those areas.

This type of building is new to the Broads, so this paper looks into the technical issues to consider relating to buildings that do float or can float.

A lot of this work is based on and expands on the thesis completed by a former colleague at the Broads Authority: “Can Floating Buildings Provide the Resilient Communities Needed in Cities?” By George Papworth, 2017 – from now on referred to as ‘the thesis’.

2 Different types of floating or can float buildings

We have identified 5 categories of floating or can float buildings. Category A is already addressed in the Local Plan for the Broads when relevant to planning. The aim of this note is to discuss category D and E. The categories are as follows:

2.1 Category A: Navigable boats that are lived on.

These are boats that are self-propelled and not fixed to any one location. Locally, these are also called live-abords. They can use residential moorings and occupants would have a base to moor the boat whilst being able to go travelling, ultimately returning to the same base. The Local Plan has a policy relating to applications for these schemes (residential moorings), as well as allocates land for such schemes. Other users are continuous cruisers, who navigate the Broads (and potentially other waterways) on a continuous basis. They do not have a permanent base on the Broads. These people tend to cruise around the Broads and moor at short term moorings.

2.2 Category B: Boats that are not navigable – houseboats.

The classification of houseboats is the one that currently benefits from a definition under the British Waterways Act 1971, which considers a houseboat to be ‘any boat or barge or any vessel or structure used or intended to be used for human habitation, but does not include any boat, barge, vessel or structure which is used for navigation’. The difference between a houseboat and a building on a raft or pontoon (Category C) was given consideration in East Staffordshire (26/03/2007 DCS No 100-048-045), where although the use of the word ‘structure’ was unclear it was determined that there was a considerable difference between a boat designed or converted into residential accommodation and a flat pontoon on which a timber chalet had been erected. Therefore, houseboats can be further defined as being either purpose-built boats for residential use, or boats that have been converted or adapted internally for residential uses, like a former barge; in both cases they can no longer move under their own power and would be semi-permanently attached to the bank via services.

2.3 Category C: Buildings on rafts/pontoons.

Unlike Categories A and B, these are not purpose-built boat structures, but are in the form of an adapted, commonly non-floating structure, like a caravan or a shed, placed on a floating raft or pontoon.

They would be considered a vessel under the Broads Act 2009, but that would not make them exempt from planning control.

Under existing case law, the size, level of permanence and physical attachment would determine whether they were considered operational development. However, no one factor is considered decisive (APP/E9505/C/10/2134003 & 2134010).

In the Broads, these are generally not supported as they can have landscape impacts. But the Local Plan says that such schemes will be considered on a case-by-case basis. And whilst the residential moorings policy does not necessarily relate to these schemes, the criteria within that policy will be of importance when considering such schemes. See [Appendix 3](#), [Appendix 4](#), [Appendix 6](#) and [Appendix 8](#).



Buildings on pontoons, near Beccles (Broads Authority, 2016). These have been replaced and this website shows images of the current buildings on pontoons: [Stay in Beccles, self catering accommodation — Hippersons Boatyard](#).

2.4 Category D: Do float buildings.

These are purpose-built structures, but not boat structures. They are similar to can-float (Category E) in that they would typically be fixed in one location by piled supports with no intention of being navigable, but the key element is that they are designed to float for the majority of the time. Additionally, they can be/have:

- **attached to piles.** Would not move along the waterbody. Would float up and down with the tide but are attached to piles in the river with no technical or mechanical involvement.
- **mechanical structures.** These are more technical with mechanical structures that aid the building to move up and down with the tide.



Do float homes in Ijburg, Netherlands (Keiren, 2016)

2.5 Category E: Can float

These are structures that are predominantly built over dry land and as a form of flood resilience are designed to float only during a flood event. They are able to float if needed. The typical form of construction utilises a watertight basement, which acts as a flotation chamber, with the structure kept in position by piled support. Therefore, by design they are never intended to move on the water from their fixed pile location. Also see [Appendix 5](#).



Can-float home in Maasbommel, Netherlands (Keiren, 2016)

2.6 Key message

There are 5 types of floating construction that could be lived on/in. Categories A, B and C (residential moorings, houseboats and buildings on rafts or pontoons are considered to fall outside of the term 'floating building' used in this paper. This paper focuses on Category D "do float homes", and Category E "can float homes".

3 Flood risk

A significant matter to consider when assessing floating buildings relates to flood risk. For both categories of can float and do float homes, we will discuss in this section: vulnerability, sequential test, resilience and access and egress.

3.1 Vulnerability

National and local policy is clear – vulnerable land uses are generally not suitable in areas of flood risk.

[Appendix 1](#) shows the vulnerability classifications and what type of land use falls into which classification. [Table 3 of the NPPG](#) shows the flood risk vulnerability and flood zone compatibility.

There is no mention of floating homes/buildings in national policy. Floating homes/buildings are not included in the NPPG vulnerability tables as a separate land use.

The NPPG Flood Risk Vulnerability Classification (see Table 2 in [Appendix 1](#)) has a water compatible section. But floating buildings are not mentioned in that section. The only reference to water-based accommodation is for ‘Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan’, i.e if it is essential to support the other types of water compatible development listed in the water compatible section.

One approach would be to use the nearest classification:

How the floating building is proposed to be used	Equivalent land use in the NPPG Flood Risk Vulnerability Classification	Vulnerability class	Flood risk vulnerability and flood zone compatibility	
			Flood zone 3a	Flood zone 3b
Permanent residential or holiday accommodation	Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.	More vulnerable.	A ‘more vulnerable’ land use in flood zone 3a would need an Exceptions Test.	A ‘more vulnerable’ scheme in flood zone 3b should not be permitted.

'Can float' buildings may be in flood zone 3b – the functional flood plain. As demonstrated in the previous table, if the nearest classification is used, such proposals would fail national flood risk policy and therefore should not be permitted.

'Can float' buildings may potentially be in flood zone 3a. Dwellings in flood zone 3a need to pass the exceptions test. Such dwellings can be assessed using the usual local and national policies and therefore, it could be argued, don't need to be able to float if they pass all the tests. In that case, the ability to float could be a way of meeting the requirements of the exceptions test and address any residual flood risk. That is to say, the policy approach for dwellings in flood zone 3a seems to already be in place.

'Do float' buildings, however, are more likely to be in the waterbody and the Environment Agency have confirmed that the waterbody is classed as flood zone 3b – the functional flood plain. Based on the 'more vulnerable' classification, they would fail national flood risk policy and therefore should not be permitted.

The Thesis concluded that floating buildings are considered as normal land-based buildings: "Having reviewed the Local Plans of all the LPAs in London, as was anticipated the overwhelming majority of adopted plans have no reference or discussion on floating buildings, as they are still considered a standard land-based construction. This was a key point raised by the responses from the developers in the survey, as they listed that the treating of a floating building as a 'normal' building was a key constraint. It appears that both the existing case law and developers are perceiving floating buildings as a distinct classification apart from 'normal' land-based development. The inevitable policy lag is creating a policy vacuum in which forthcoming applications may need to be determined. The fall-back response from the EA and the LPAs at present is to consider them as 'normal' buildings."

The issue therefore seems to be that there is no distinct classification for can float and do float homes. So they are considered as normal buildings and not being a type of building of their own – and as a result of the 'more vulnerable classification' they should not be permitted in some flood zones (as discussed previously).

3.2 Sequential Test

According to national policy and guidance¹, the sequential test does not apply to the following applications:

- Located in flood zone 1 (unless the Strategic Flood Risk Assessment indicated there may be flooding issues now or in the future)
- Minor development

¹ <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Sequential-Test-to-individual-planning-applications>

- Change of use, although it does apply for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site
- Allocated in local plans

The sequential test applies to applications that are not in the list above.

The Flood Risk SPD² elaborates on certain aspects of the sequential test to aid its appropriate application in the Broads.

Turning to relevance of the sequential test to can float and do float homes, it is expected that the sequential test will be required as these schemes are likely to be in flood zones 3a or 3b.

The issue arises that the actual use that a can float or do float home seeks to provide (residential or tourism) do not have to be on water or near to water. It can be argued that these land uses can be developed on land. The applicant may *want* to provide these uses through can float or do float homes, but there does not seem to be a *need*. So it seems that the sequential test could be difficult to pass for can float and do float homes.

Looking at some examples, the scheme in West Berkshire – [see Appendix 2](#), the Local Planning Authority argued that the floating buildings did not pass the sequential test. This case was not tested at appeal. That being said, the building on a raft at [Appendix 6](#) was permitted and seems to have passed the sequential test.

3.3 Resilience

The Flood Risk SPD for the Broads³ refers to flood risk resilient buildings. This tends to be about reducing the amount of water that enters a building in an area liable to flood, as well as ensuring speedy recovery when flood waters subside. Perhaps not all typical flood resilient guidance is appropriate to do float and can float homes, but fundamentally, the design of the building is important in terms of floating and being able to float.

3.3 Access and Egress

As set out in the following paragraph, schemes for can and do float would no doubt require site-specific flood risk assessments. A key aspect of considering flood risk will be demonstrating that a development will be safe and part of this includes access and egress and ensuring this is in place for the lifetime of the development. The NPPG goes on to say that this is an early important consideration as it may affect the final design.

In the Broads, can float homes would likely have access and egress through the functional flood plain. Do float homes are themselves probably in the flood plain and so at least part of the access and egress would also be in the flood plain.

It will be important to understand the access and egress to an area of lower flood risk, rather than just to/from the building itself.

² [Broads-Flood-Risk-SPD-2020.pdf \(broads-authority.gov.uk\)](#)

³ [Broads-Flood-Risk-SPD-2020.pdf \(broads-authority.gov.uk\)](#)

3.4 Policy Requirements

Any application would need to be accompanied by a site-specific flood risk assessment. They would also need a flood response plan. The sequential test and exceptions test would be required, as appropriate. The Flood Risk SPD includes guidance and requirements and would be of relevance to any scheme.

3.5 Other important considerations

Flood storage – advice from Norfolk County Council LLFA: ‘for the do float house providing there was a suitable range on the dolphins then it would be no different to a pontoon in terms of flood storage. While for the can float there would be a loss of flood storage it should be minimal, although it would need to be proven. For example, dependent on the construction approach would depend on whether water could enter the chamber readily during low return period events. If this is not the case, meaning the dry dock is disconnected from the floodplain then there would be a minor loss of floodplain that would need to be compensated’.

EA considerations – see [Appendix 9](#) for more information, but to summarise the main considerations:

- The nature of the flooding in the proposed location and the impact it could have on the development and its users.
- What needs to be done to ensure it is safe in the event of flooding in the proposed location in the context of its users.
- What needs to be done to ensure the floating structure will be adequately secured in the event of a flood in the proposed location, considering the risk if the proposed development becomes mobile in the event of a flood (for example, if downstream of the location there are bridges, if the structure became mobile it could cause a blockage and increase flood risk elsewhere).
- Purpose-built floating structures that cannot be used for navigation (e.g. floating mobile homes or chalets) are often attached to pontoons and therefore more susceptible to being damaged and swept away in a flood. This places their occupants and others at greater risk.
- Where floating structures are proposed, it is our preference that they should be passive structures rather than require any active intervention by a third party to enable their floating function (e.g. development rises and falls with the water level without any active intervention to enable this to happen).

3.6 Key message

Floating buildings are not treated differently to land-based buildings in national policy. As such, residential in flood zone 3b should not be permitted. In flood zone 3a, residential needs the exceptions test. But the sequential test will be difficult to pass as tourism accommodation and market residential do not have to go on water.

4 Impact on navigation, impact on width of waterway

4.1 Purposes of the Broads Authority

One of the purposes of the Broads Authority is to protect the interest of navigation. There are various byelaws to be aware of and also policies in the Local Plan.

4.2 Policies in the Local Plan for the Broads

Section 23 of the [Local Plan](#) is about navigation. Key extracts from the Local Plan are as follows:

SP13 says:

The water space will be managed in a strategic, integrated way and navigation and conservation interests will be maintained and enhanced.

Navigable water space will be protected and enhanced through: i) The careful design of flood alleviation/protection projects; and ii) Avoiding development and changes in land management which are detrimental to its use

DM31 says:

Developments that support and encourage the use of waterways [inter alia] will be permitted (subject to other policies in this Local Plan) provided that they:

- a) Would not adversely impact navigation;
- b) Would not result in hazardous boat movements;
- c) Would not compromise opportunities for access to, and along, the waterside, access to and use of staithe, or for waterway restoration;
- d) Are consistent with the objectives of protecting and conserving the Broads landscape and ecology, including the objectives of the Water Framework Directive;
- e) Are consistent with the light pollution policy; and
- f) Would not prejudice the current or future use of adjoining land or buildings.

As mentioned previously, residential moorings, for navigable vessels that are lived on, is covered in the Local Plan. As part of policy DM37, the impact on navigation is a key consideration.

Further, DM37 directs residential moorings to marinas, boatyards and basins (in certain locations, see later) or in Norwich. The requirement for such moorings to be in marinas, boatyards and basins reflects that these areas are not main navigation channels and that siting residential moorings there would have no impact on navigation. The residential moorings guide⁴ refers to certain specific moorings to be permitted for residential moorings or may

⁴ [Residential moorings guide \(broads-authority.gov.uk\)](#)

want an area to be permitted with a maximum number of residential moorings within that area, to reflect the operations of the marina or boatyard or site. The potential to impact navigation would be a key consideration for such moorings in Norwich.

4.3 Byelaws

The impact of a scheme on navigation is a key consideration for the Broads Authority and there are byelaws to ensure this.

4.4 Key messages

Do float homes will need to ensure they do not impact on navigation. In terms of can float homes, the requirement will be similar as, whilst they will not be on water, they will still need to be designed to ensure their floating mechanism does not cause an impact. Another consideration would be any part of can float homes protruding into or over the water.

5 How water flows around the building

5.1 Summary of research

It is not very likely that the impact of can float and do float homes will become a key issue regarding flow of water in main channels, as the navigation impact is the primary issue. That is to say that if a development were to protrude into the navigation channel, it may not be acceptable due to that particular impact. More generally, something that floats might not affect the flow of water; however, there could be a cumulative impact depending of the infrastructure required, for example if there are a number of piles.

5.2 Example policy wording

Taking an example of policy wording elsewhere in the country, Wandsworth Council's emerging Local Plan policy LP62 refers to 'unacceptable harm to the operation of the river regime'. Following this wording up with Officers at the Council, they said that the phrase, 'unacceptable harm to the operation of the river regime' refers to the pattern of the river's flow over time and unacceptable impacts could involve a significant change in speed or direction of the river as this could lead to erosion or other impacts further along.

5.3 Key messages

It would seem prudent for any policy to address the issue of the potential for impact on the river regime.

6 Connections to utilities

6.1 Examples

Locally, the buildings on rafts at Hipperson's Boat Yards do not have gas connections, but water and sewage are supplied via pipes (plastic, semi-flexible) and electricity is via an armoured cable.

The West Berkshire case study at [Appendix 2](#) says 'each property is serviced via flexible pipes to allow continuous connectivity for incoming electricity, water and telecoms and removal of wastes during a flood event'.

6.2 Key messages

Both types of floating homes would rise and fall with the water level, so the potential for such movement will need to be designed in when providing utilities. As is discussed later in the document, in terms of foul water, it is expected (policy DM2 of the Local Plan) that schemes will be connected to a foul sewer unless proven not to be feasible.

7 Construction techniques

7.1 Summary of research

It seems that there are a few different ways to construct can and do float homes. It depends on how the building would be transported to the site and if there is a dry dock present.

The hull could be constructed off site and then floated into position. Or it could be driven from the factory to position; but the width of the roads used to access the site would affect the size of the building. The super structure would then be built on site and a dry dock seems to be a useful feature nearby to help with building.

7.2 Key messages

Anyone proposing a can float or do float home will need to consider how and where the building would be constructed and transported and put into place. This would be considered at the planning application stage.

8 Mortgage and insurance

8.1 Summary

Whilst not necessarily a planning matter, the ability to secure a mortgage may be a key aspect that needs confirmation before building a floating home.

Insurance tends to be a marine-type insurance, but there are examples where floating homes have insurance. The ability to secure insurance may be a key aspect that needs confirmation before building a floating home.

8.2 Key messages

Anyone wanting to develop a floating home, wishing to rely on the building being mortgageable and insurable, will need to seek confirmation in advance. This could affect how the building is designed and secured which may be relevant to the determination of any planning application.

9 Where could can float and do float homes be allowed?

9.1 Policies of the Local Plan

As with all homes, how they are used could vary. Can float and do float homes could be permanent residences (including affordable housing), holiday accommodation or second homes. The related policies in the Local Plan would therefore be of relevance whereby we treat floating homes the same as land-based equivalent:

- For permanent residential, the policies in section 24 of the Local Plan will be of relevance, especially the location criteria of within a development boundary.
- For holiday accommodation, section 22 of the Local Plan is of relevance.
- In terms of second homes, the Local Plan says 'holiday homes that will be occupied as second homes are not considered as holiday accommodation for the purpose of this policy, but as new dwellings'.

Another type of development that has location criteria set out in the Local Plan is residential moorings. The location criterion of the residential moorings policy in the Local Plan, DM37 says *'is in a mooring basin, marina or boatyard that is within or adjacent to a defined development boundary or 800m/10 minutes walking distance to three or more key services (see reasoned justification) and the walking route is able to be used and likely to be used safely, all year round or is in Norwich City Council's Administrative Area'*. There could be potential to use this location criteria within any policy for floating homes.

It should be noted that these policies will be reviewed and updated and potentially amended as part of the new Local Plan, so some elements could change.

9.2 Other considerations

It will be essential that nearby land uses are considered. For example, the amenity issue if proposing such homes in a working boatyard or marina or schemes next to public rights of way. The impact on navigation would be an important consideration, as discussed earlier in this paper.

Schemes would need to think about whether any placement of floating homes could pose a risk to future restoration projects. If it results in development of part of a floodplain, it may become harder to rewet other parts of the floodplain if it is seen as making those other parts more likely to have higher floods.

9.3 Key messages

Any Floating Homes policy will require location criteria. There are already such criteria for land-based dwellings and residential moorings in the Local Plan that could be used.

10 Costs and viability

10.1 Discussion

The cost of land is a cost factor to consider when planning schemes.

Do float homes are on the water. Parking provision, access and egress elements of schemes will be on land. In the Broads, the riverbed is owned either by the City Council or Crown Estate and some Broads may be privately owner. So some arrangements would need to be put in place if an applicant wanted to use the riverbed. The financial implications as regards an agreement about the use of the riverbed would probably impact on viability.

Can float homes are in the flood plain, on land, so it is presumed there will still be a land cost to consider. Indeed, the West Berkshire case study at [Appendix 2](#) implies that can float homes cost twice as much to build as land-based homes, which are not in the flood plain.

Policy requirements need to be viability tested during the Local Plan stage. The viability of can float and do float homes could be assessed as a development type as part of that process, if a policy was taken forward.

Floating homes will probably still need to meet the various requirements of the Local Plan such as affordable housing and open space provision, depending on scale of the schemes.

10.2 Key messages

It is not clear at this stage how the cost of can float and do float homes, in particular any land cost and any extra construction cost, could impact on viability and therefore policy requirements and planning obligations., If floating homes are taken forward in the Local Plan, the viability work would look into the viability of the policy.

11 Planning related issues/considerations

11.1 Policies of the Local Plan for the Broads

All policies of the local plan would be relevant. For example, buildings would be designed to be energy efficient and water efficient. They would be expected to dispose of foul water up the hierarchy listed in DM1. Depending on scale, they would need to address the requirements relating to affordable housing and open space. Other planning related issues are discussed elsewhere, such as impact on peat, dark skies, navigation, viability, utilities, design and flood risk, some of which have been discussed in this paper.

11.2 Key messages

Many policies of the Local Plan for the Broads will be relevant and important in considering such schemes.

12 Constraints to can float and do float homes

The Thesis includes thoughts and queries from planning officers and developers about what constraints there could be to can and do float homes. For this paper, the thoughts and queries have been grouped, with commentary provided by the Planning Team, in italics.

- River amenity harm, character and appearance of the area. Design and appearance, appropriateness to character. *These are all important considerations. The importance of design is more prominent in national policy. Impact on the built and landscape character and design have always been important considerations when determining any application in the Broads so, as a Local Planning Authority, the Broads Authority is experienced at considering these issues. Perhaps this is where the location section of this paper, [section 9](#), is of relevance. That is to say that, like residential moorings, floating homes could be in marinas and boatyards.*
- Servicing. *It is presumed that this refers to utilities. This is discussed earlier in the document at [section 6](#). There could be other considerations such as bins, cycle storage, car parking, but these could be provided in the usual way as for land dwellings and residential moorings.*
- Management and operation. *There will need to be an element of ongoing management and maintenance. For schemes for individual floating homes, could the onus be on the owner? Where there are joint elements of a scheme, then there may be some kind of management, similar to flats. This will be for the operator and scheme promoter to consider and put in place.*
- Public access and use, continued waterway access, interference with navigation on rivers; rivers should be for the public to enjoy and floating structures/buildings should allow for enjoyment for all, e.g. for pleasure craft, and not permanent residences. Development of floating structures would limit the useable channel and cause safety issues. Floating buildings would conflict with other water uses, e.g. recreational activities. Obstruction of the waterway. *This is addressed at [section 4](#) where the impact on navigation is discussed. Again, perhaps this is where the location section of this paper, [section 9](#), is of relevance; like residential moorings, floating homes could be in marinas and boatyards.*
- Obstruction of the towpath/adjacent land. *Again, perhaps this is where the location section of this paper, [section 9](#), is of relevance; schemes would not be acceptable where they interfere with towpath and adjacent land or cause amenity issues.*

- Anti-social behaviour. *It is not clear how anti-social behaviour experienced by those living in can and do float homes would be any worse or different to those living in land-based dwellings. Perhaps being located in marinas or boatyards could add greater protection, if any more were needed?*
- Flood/tidal defence harm. *Flood risk, especially if structures become loose during flood event. I would assume that floating buildings are designed to approved standards that could withstand tidal changes. As a flood risk manager, my concern would be both flood risk to the development itself (particularly if residential accommodation) and from the development. Static waterbodies may be more appropriate for floating buildings and these have been common place in places like Denmark and Holland. There are examples also in the UK. I would be concerned with potential loss of flood storage or reduction in conveyance, as well as ensuring that occupants of the building have safe access and egress during times of flood. [Section 3](#) discusses flood risk.*
- Location. *This is discussed in [section 9](#).*
- Lack of knowledge and expertise of delivering this type of building, lack of specialised contractors/builders to work on water for what needs to be looked at as "normal" houses. *Noted and that may will be an issue.*
- Lack of insurance. *Discussed at [Section 8](#)*
- Lack of funding, most in the UK have been self builds. *Noted, but this is not necessarily a planning issue. It would be for a scheme promoter to design and deliver a scheme within their budget.*
- Lack of knowledge and understanding of NPPF. Councils and the EA are very resistant to change even if it is within the rules. The EA treat a floating structure as a normal building. *It is not clear how there is a lack of understanding of the NPPF and national policy as a whole in relation to floating buildings. There is no part of national policy that refers to floating homes, as discussed in the [flood risk section 3](#).*

13 Conclusion

This paper discusses some topic areas related to can float and do float homes. Those topic areas are as follows, but there may be other topic areas to consider.

- Different types of floating or can float buildings
- Flood risk
- Impact on navigation, impact on width of waterway
- How water flows around the building
- Connections to utilities
- Construction techniques
- Mortgage and insurance
- Where could can float and do float homes be allowed?
- Costs and viability
- Planning related issues/considerations
- Constraints to can float and do float homes

The main constraint to promotion/development of can float and do float homes is that of flood risk as schemes are likely to be contrary to national policy on flood risk. There seems to be no

route through national flood risk policy that would allow for do float and can float homes in flood zone 3b, including the waterbody itself.

As things stand, it is likely that promoting can float or do float homes in the Local Plan will not be possible due to conflict with flood risk policy.

Appendix 1: NPPG Flood Risk Vulnerability Classification

Source: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Yellow highlights show reference to dwellings and houses and homes.

Table 2: Flood risk vulnerability classification

Essential infrastructure

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.
- Wind turbines.

Highly vulnerable

- Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings⁵.
- Caravans, mobile homes and park homes intended for permanent residential use⁶.
- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure').

More vulnerable

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels⁷.
- Buildings used for dwelling houses⁸, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill* and sites used for waste management facilities for hazardous waste.

⁵ It is not likely that floating buildings will be provided as basement dwellings. So this is not relevant to floating buildings.

⁶ It seems that houseboats and buildings on rafts or pontoons used for permanent residential dwellings could fall into this category.

⁷ It seems unlikely that these land uses would be provided through the use of floating buildings, so this category does not seem relevant.

⁸ This seems the most relevant category for can float and do float homes either used as tourist accommodation or permanent residential accommodation.

- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan⁹.

Less vulnerable

- Police, ambulance and fire stations which are not required to be operational during flooding.
- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill* and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.

Water-compatible development

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (**excluding sleeping accommodation**).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- **Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan¹⁰.**

* “ Landfill is as defined in [Schedule 10 of the Environmental Permitting \(England and Wales\) Regulations 2010](#).

⁹ It seems that houseboats and buildings on rafts or pontoons used for tourist accommodation could fall into this category.

¹⁰ Unless the application for the can float or do float home shows that it is for essential accommodation for staff required by the uses set out in water compatible development section, then this is not relevant.

Appendix 2: Case Study – West Berkshire Council, Theale Lake – scheme involving can float homes.

2a) Link and details of the proposal

[16/01240/OUTMAJ | Outline planning application for a residential development of up to 225 homes with associated infrastructure including flood alleviation works, drainage works, new buildings to house sailing facilities with associated access and parking, works to the bridge over the Kennet and Avon Canal, means of access, footways, amenity green space, landscaping and other related works. All matters reserved except access. | Burghfield Sailing Club Hangar Road Sulhamstead Reading Berkshire RG7 4AP \(westberks.gov.uk\)](#)

The scheme included 24 can float homes (category E) that would look like this, on the edge of the lake.



The can float homes were proposed to be around the lake. See following plan.



2b) Extracts from the Design and Access Statement.

The 24 Can-Float homes along the edge of Theale Recreational Lake are at an extremely low level of risk as the ‘heel’ of each property is in Flood Zone 1 (with permanent dry access all the way to the M4 motorway) and although the ‘toe’ of the building is in Flood Zone 2, the house will safely float in the event of any severe flood event. This minor increase in risk is too small to be quantified, so it is a ‘philosophical’ risk rather than a relevant tangible risk.

The area allocated for the can-float homes is also predominantly located in Flood Zone 1 with a very small area categorised as Flood Zone 2. For this reason, the can float homes are best suited in this low risk flood zone as the homes are able to rise and fall with changing flood levels.

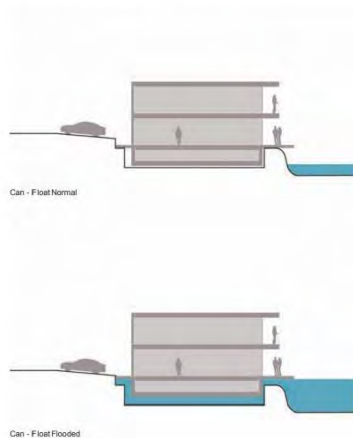
The area allocated for the can-float homes also remains predominantly in Flood Zone 1 with a very small area categorised as Flood Zone 2. For this reason, the can-float homes are best suited in this low risk flood zone as the properties will always remain above the modelled top water in the lake.

The Can Floats ground floor finished level AOD will be set so that the property will float at a minimum of a 1 in 20 year flood event, equivalent to a 5% Annual probability that it will need to float (5%AEP).

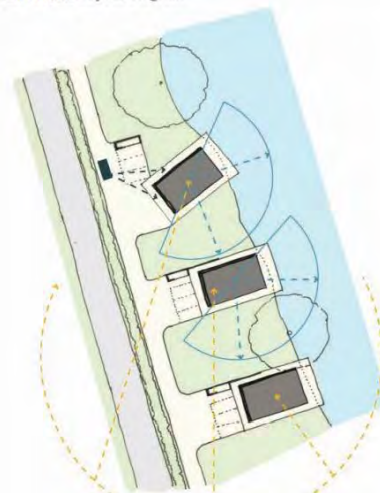
The floatation is achieved with 3 core components.

1. A precast concrete basin on piled foundations provides a solid base for the building to sit on and transfer its loading to the ground. It secures against any lateral building movements as the Can-Floats are not directly connected to the ground. The basin's principle objective is to provide a controlled environment for flood water to flow under and surround the basement structure containing the buoyancy and uplift capabilities.
2. A basement structure or Platform is constructed using a system called Concrete-Encased Expanded Polystyrene Floating Platform. Expanded Polystyrene (EPS) Blocks, which contain 98% air and the closed cell structure of their foam pearls, provide a very high buoyancy capability. The EPS Blocks are surrounded by a lightweight, reinforced concrete coating for protection and longevity. There is an internal substructure between the EPS blocks of either beam and block or columns and a reinforced concrete slab is poured on top to complete the Platform. This Platform provides a solid raft slab for the house to be built off and the floatation and buoyancy capabilities in one structure.
3. Guide piles limit the movement of the Can-Float during a flood event to just rising and falling. Around the guide piles are spring loaded rollers within a locating collar inside the platform to ensure smooth vertical movement. For each Can-Float two piles are placed on diagonally opposite corners. These piles extend up from the foundation and the Basin structure, through the Platform and above the ground floor finished floor level. They can either be external to the building envelope or hidden within the wall build up.

Can - Floats Section Diagram



Can - Floats Layout Diagram



Each property is serviced via flexible pipes to allow continuous connectivity for incoming electricity, water and telecoms and removal of wastes during a flood event. Low level street lighting in bollards/ posts along the private access road will provide illumination to the road surface and safety lighting, without significant light spillage.

The Can-Float homes are proposed in 2 Sizes; 4 Bedroom, 2 storey, 2000ft² and an extended 4 Bedroom, 2 storey, 2500ft², providing options for different households with choices for end user configurations being possible through bespoke ground floor layouts. Both variants will have a deck that runs around 3 sides of each home; the entrance and open façade sides will be

1500mm wide; at the lake side it will be 3000mm, partially overhanging the water. This is formed as part of the floatation platform. Each Can-Float will be approximately 6.5m tall from the finished floor level of the deck to top of roof.

2c) Case Officer's Report and the can float homes element of the scheme

The [case officer's report](#) said the following about the can float homes.

5.2.11 Furthermore the can float homes along the lakeside edge, by reason of their presence, number and associated domestic paraphernalia will result in an urbanising impact on the lake. Currently undeveloped and rural in its appearance, the new houses span the western edge of the lake to create a string of development changing the character of the waters edge. The buildings will sit prominently on the lake and furthermore the loss of trees and shrubs as a result of this development will further increase the visual impact arising from this part of the development. These views will be obtained principally from PROW BURG/28/1 and glimpses from the M4. Filtered views will be obtained from Hanger Road and increasingly prominent within the winter months. Again the number and size of the buildings will increase the visual impact of these structures eroding the rural character of the area.

5.4.13 1 On the basis that the can-float homes are primarily within flood zone 1 with only the toes of the building within flood zone 2. This is however contrary to the information shown on sketch plans FP#001 to FP#008 dated 2 November 2016 which were submitted as part of the application. These show that the can-float homes are located in areas of medium and high probability of flooding as indicated by the EA flood maps for planning.

5.4.21 To conclude, it is considered that the proposed siting of the 24 can-float homes fails to meet with the sequential test. The 201 homes are in flood zone 1 and as such the sequential test is not applicable and the new sailing club buildings meet the test. **The siting of the 24 homes however runs contrary to the precautionary principle of national planning policy however it is recognised that the applicant has demonstrated that safe access into and from the site can be achieved and the EA have confirmed that the proposals would not increase flood risk elsewhere thus removing their original objection to the scheme. Furthermore, the scheme would deliver some incidental off site benefits reducing flood depths on the local road network. In light of these factors it would not be possible to demonstrate the harm arising from the development and as such the failure to meet the sequential test would not constitute a refusal reason on its own.**

5.7.4 In accordance with advice from an external consultant the Council are satisfied that it has been demonstrated that the scheme would be unviable were a full, policy compliant contribution (40%) to be made. The viability of the scheme is impacted on principally by 'abnormal' site works/facilities to include costs relating to: the sailing club, new bridge, flood

prevention, nature conservation and the cost of building the can-float homes which is estimated at around twice the cost of a conventional property.

2d) Decision by LPA

The application was refused. Here is the [decision notice](#). The main reasons for refusal seem to be:

- This is not a genuinely plan-led allocated site, nor is it previously developed land, as sought by the statutory development plan and the NPPF. The development of this site for 225 dwellings acutely conflicts with the aforementioned policies, and would not contribute to a sustainable pattern of development in West Berkshire. Moreover, the development would harm the landscape character of the area, have adverse visual impacts and have significant negative impacts for biodiversity and on the highways network alongside significant harmful impacts on the catchment primary school Burghfield St Marys.
- The development fails to have due regard to the sensitivity of the area to change. The introduction of new housing in this location and at the scale proposed will appear alien within the landscape and undermine the rural qualities of the area.
- Insufficient information has been provided to determine whether roosting bats will be impacted by the proposals.
- Insufficient information has been provided at this stage to demonstrate that the net loss of up to four nightingale territories can be adequately compensated for by the provision of retained and managed habitat
- The proposed development includes the provision of a new canal bridge which is sub-standard in respect of design that will require repairs and maintenance at an unacceptable level of frequency, which would adversely affect road safety and the flow of traffic.
- The application fails to demonstrate that the impact of the development on primary school provision can be mitigated.
- The development fails to provide a planning obligation to deliver necessary infrastructure, mitigation and enabling works (on and off site), including: affordable housing, travel plans, highway works to include the new bridge, public open space, community bus service, a satisfactory solution to the impact on primary school provision.

2e) Appeal

The decision was appealed. The appeal was later withdrawn.

2f) Commentary

It is important to note that this scheme is on a lake and not a river and that could be why flood risk was not necessarily a main issue. Indeed, concerns about flood risk were not reasons for refusal of this scheme. But the scheme did fail the sequential test, but that was not seen as a refusal reason on its own. It seems that the design and location of the entire scheme as well as ecological concerns and concerns regarding a bridge were the main reasons for refusal. It is

interesting that, on demonstrating a safe access and egress and that flood risk would not be increased elsewhere, the EA withdrew their objection.

Appendix 3: Case Study - The Chichester Prototype

Floating Homes Limited completed the build of their first prototype buoyant building designed by Baca Architects in 2017. Inspired by canal living, the 'Chichester' model¹¹ is not a houseboat but a house that floats.

The prototype is situated on a residential mooring on a disused canal which runs alongside Chichester Marina.

The water level can vary by around 40cm so the water and electricity are supplied via flexible pipes and cables. The sewage is pumped out of the hull via another flexible pipe into the mains system running alongside the canal.

The floating home was built in two separate parts, the floating foundations and the modular superstructure and then assembled on the canal. The floating foundations is an open boxed shaped hull with 15cm thick sides and base made from reinforced concrete weighing over 40 tons and is zero maintenance. The modular superstructure was constructed using lightweight structurally insulated panels (SIPS) in a factory.

This version has mechanical ventilation with heat recovery (MVHR), underfloor heating and a solar PV system which supplies the hot water via a Sunamp heat battery.

The cladding is western red cedar that has been treated to create a uniform silver grey finish. The build takes around six months to complete and has a starting price of £200k plus VAT (no vat payable on residential) which includes the interior fit-out but excludes delivery and mooring fees. The 'Chichester' offers an appealing lifestyle in either urban or countryside settings.

It should be noted that the owner pays rent to the marina in which it is situated.



Commentary: Note that this looks like it is a building on a raft or pontoon – category C.

¹¹ [The Chichester | Baca Architects \(www.baca.uk.com\)](http://www.baca.uk.com)

Appendix 4: Case Study - Brockholes floating visitor village

[Visit | Brockholes Nature Reserve](#)

The innovative platform is a cellular reinforced concrete structure with polystyrene infills. Special measures have been taken in line with the sustainable objectives of the project, including the use of 4800 tonnes of recycled concrete and environmental management. Floating on the largest lake on the site, the pontoon will support a cluster of 5 buildings forming the new landmark Visitor Centre, and bringing the experience of the wetland habitat closer to the visitors.



Commentary: Note that this looks like it is a building on a raft or pontoon – category C.

Appendix 5: Case Study – replacement dwelling - Amphibious House

More detail

More details can be found here: [Amphibious House | Baca Architects](#).

A small island located on the River Thames, in south Buckinghamshire, is home to 15 houses. The houses, which were mostly built before the 1950s, are typically raised about 1 m off the ground on timber piles to protect them from flooding. At the time of construction they were only built high enough to protect them from regular flooding rather than extreme flooding. When the owners of one house on the island plan to be built their home they discovered that the floor level would need to be raised a further 1.4 m above the ground level to cope with the predicted extreme. This would've resulted in a house with its ground floor elevated 2.5 m above the ground. The house was also subject to Conservation and Environment Agency rules. The solution was an amphibious house, a building that rests on the ground when conditions are dry, but rises up in its dock and floats during a flood. The house itself sits in the ground and the floating base is almost invisible from the outside. The ground floor of the house is raised above the ground by less than 1 m rather than by almost 2 m as will be required if it were not amphibious. This approach meant that the 225m² three-bedroom dwelling could be constructed over three floors in the place of a single-storey 90m² house without significantly increasing the ridge height.



Commentary: Note that this is a replacement dwelling, so there is no increase in flood risk. There is a wet dock that can be flooded when river level rises. Inside wet dock is floating home. Dolphins to guide it up and down. Note that this looks like it is a can float building – category E.

Appendix 6: Case Study - Erection of a single storey, three bed roomed floating house, Worcester.

Location: NORTHWICK MARINA, NEWEYS HILL, WORCESTER, WR3 7AL

Link to application: [Planning application: P17E0114 - Worcester City Council](#)

Full planning permission granted in 2017.

The 145m² oval bungalow will float permanently on the water, attached to the bank by two support piles. Attached to a residential mooring.

FLOATING HOUSE VISUAL (PP-05832322)

Visual of Floating House from River eastern side footpath bridge



Extracts from the application documents:

The planning application ensures that the mooring piles will be of sufficient height to cope with the flooding well past the 100 Year + Climate Change level so there is no risk of the vessel breaking loose.

Site Specific Flood Risk Assessment:

- The primary development on the site is the floating house. This does not require a set finished floor level as it will move up and down fixed mooring posts as the river level changes, thereby mitigating the risk of internal flooding posed from rising flood waters.
- Due to the floating nature of the house and the raised level of the bungalows on the site there is no requirement to include flood resistant measures at the site.
- Due to the floating nature of the house and the raised level of the bungalows on the site there is no requirement to include flood resilience measures at the site.
- For all the proposed developments on the site there will be safe dry access at the 1% + CC AEP level of 17m AOD. The two bungalow developments will be located above the 1% + CC AEP flood level and the floating house will include a floating walkway that rises with the house during raised water levels.
- The only development in the floodplain is the floating house which will float above the rising flood waters. Therefore, there is no requirement to provide any floodplain compensation as a result of the development.

Extracts from [Committee report](#)

8.57 The National Planning Policy Framework 2012 and SWDP clearly states that development within flood zone 3b is unacceptable for a proposed residential use which would be considered more vulnerable. However, that guidance fails to take into account development which is proposed to work with the natural changes in the river levels and responds to these circumstances as the proposed floating house would do.

8.58 However, there is limited evidence to profoundly show that the floating house could withstand the stresses and strains of the impact of a flood or flood debris. There has been limited evaluation of what these would be, with an intention to design to meet the circumstances once permission is given. However, this matter could be resolved within a condition providing that the design does not alter significantly as a result of this understanding of the site.

8.59 The existing policy position is a significant material consideration in this circumstance and I consider the occupation of the site in a residential capacity has been established. Whilst the houseboat would differ from a boat with being permanently sited and not able to move in times of flood, nevertheless I consider that this is a design issue which could be resolved.

8.60 I welcome the creative and innovative nature of the scheme and the wider benefits it would enable within the site and the occupation of the site in such a bespoke manner which would have a significant positive on the site and the biodiversity of the site.

8.61 Whilst the assessment is not an exhaustive list of all policies that are potentially applicable to this site, it seeks to address how the proposals respond to the key planning criteria in the planning policy framework against which the planning application will be determined. Whilst the type of development is unable to meet the requirements of the Green Space policy SWDP 38 I believe that the level of improvement in the natural environmental qualities of the site from the existing position and considerable and ought to be given due weighting.

8.62 Furthermore, the low quality assessment of the site in terms of the impact on the Riverside Conservation Area and the biodiversity within the vacant site can be significantly improved to add benefit beyond the site. The built form has been designed to address the site and to improve the relationship to the riverside, the bespoke design would add visual interest along the riverbank and the improvements to the riverbank too the benefit of members of the public using it.

8.63 Should members feel that conditions could be drafted to suitably ensure the structural capacity of the floating house can be achieved then this could overcome these reservations. There is a cautious recommendation for approval with full technical and structural assessment required. This will most likely require an expert opinion to confirm whether the proposal has been suitably designed to withstand the natural changes in the site from water changes. In this regard, a fresh planning application may be required should this result in the need for additional structural engineering works beyond the scope of those shown on the submitted plans, which would need to be assessed on its individual merits without prejudice to any decision made by the Planning Committee on the current application.

Commentary

Note that this looks like it is a building on a raft or pontoon – category C.

In their comments, the EA seem to remind the Council of national flood risk policy and how this scheme seems to relate to that. Comments also relate to structural integrity of the scheme.

The sequential test says ‘In this case, the developer’s needs are very specific, for a floating house located in the river with two additional conventional residential units. No equivalent alternative is available, and any alternative would necessarily have a similar risk profile’. As noted in section 3.2, this seems to reflect what the applicants wants rather than need.

Appendix 7: Case Study - Ashwicken Lake, West Norfolk

Planning application details and link:

[21/00262/FM | Proposed construction and operation of an eco-leisure and tourism facility comprising holiday lodges, clubhouse and spa, boat house and jetties, staff accommodation with other ancillary development including access road, car parking, electric vehicle charging points, outside recreational facilities, follies, renewable energy generation, site security measures, drainage, hard and soft landscaping and biodiversity enhancements together with highway improvements to East Winch Road, Church Lane and Ashwicken Road and temporary construction access route. | Ashwicken Lake Church Lane Ashwicken Norfolk \(west-norfolk.gov.uk\)](#)

EDP article:

[Plans revealed for Ashwicken Lake in Norfolk | Eastern Daily Press \(edp24.co.uk\)](#)

The proposal is to create the "Ashwicken Lake Wellness Resort" at the site of the Ashwicken lake, to the south-west of the Ashwicken and immediately east of Church Lane. The proposals are discussed in various planning documents, including the Design and Access Statement – prepared by Baca Architects.

Key elements of the proposal include:

- A Clubhouse and Spa with a range of facilities – floating on the lake;
- Static and floating lodges along sections of the lake shoreline – single storey;
- Static and floating villas on the lakeside edge – two storey;
- Treehouses located in the northern part of the site – two storey;
- Flatted units on the "Water Lily" floating island – two-storey;
- Follies – themed and recreationally functional;
- Various recreational and wellness facilities;
- Other infrastructure to support site operations – including a solar array and an on-site sewage treatment works.

The design takes careful account of various constraints, including:

- The lake itself – various opportunities and constraints;
- 123kV overhead electricity cables crossing the centre of the site;
- A gas pipeline located within the site, close to its southern boundary;
- Flood risk issues – discussed in this document;
- Other environmental constraints.

The on-site accommodation comprises of static and floating lodges and villas, and tree houses. At the heart of the development are the "Floating Clubhouse and Spa" and the "Water Lilly PADS" - a floating island of apartments. The centrepiece of the development is the Clubhouse and Spa, the UK's first clubhouse on the water.

The "Water Lily" is a floating island of 40-flatted apartments located in the southeast corner of Ashwicken Lake. The Water Lilly provides a contrasting type of accommodation and setting to the private lodges.

The internal road network in the eastern section of the Site will be established first and construction laydown areas located in areas proposed as future car parks. A slipway that will

also be used for future boat use will be constructed at the south-east corner of the lake. The prefabricated floating lodges will be launched from that slipway.





Figure 3.13: Model of Ashwick Lake with Proposals



Figure 3.30: Lake view of the floating villas



Figure 3.32: Aerial view of the villas and parking



Figure 3.31: Sectional drawing showing higher lake edge, bridge and floating

3.12 > WATER LILY "PADS"

baca



Figure 3.35: Site location plan



Figure 3.40: Precedent image. Built floating pavilion

Design

The Water Lily is a floating island of 40-apartments located in the southeast corner of Ashwick Lake. The Water Lily/Lotus plant whose big leaves float on the water's surface to attract ample sunlight for photosynthesis inspire its design. In this case visitors will use this suntrap for relaxation and well being.

The island floats near eastern edge of the lake and can be easily reached by two bridges and by water taxi. The island is formed from three interlocking leaves of accommodation that enclose a private area of water. The outdoor space between the leaves creates a sunbathing terrace. This composition means that all of the apartments have a clear view out to the lake and that the wrapping nature of the design creates a sheltered and enclosed courtyard at the centre.

Size, scale and massing

The "Water Lily" is a two storey structure that floats on the Lake. The lake embankment is approximately 2.25m to 2.5m higher than the "Water Lily's" primary floor meaning only one storey is visible above the rim of the Lake. We have included site section drawings through the site that show how the bunding and planting at the extremity of the site will further screen potential noise and views.

Construction

The Water Lily will float on an engineered interlocking pontoon similar to the adjacent precedent image. The repetitive plan means that much of the apartments above can be prefabricated and assembled on site. (See Section 3.13 > Construction Strategy for further detail)

Conclusion

The Water Lily provides a contrasting type of accommodation and setting to the private lodges. It is hoped that it's lakeside setting and its iconic form, which is both nationally and internationally unique, and would attract visitors from far afield to holiday at the site.

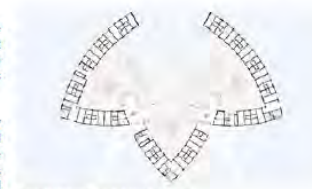


Figure 3.41: Water Level > Ground floor plan

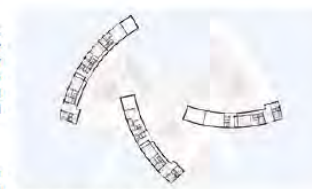
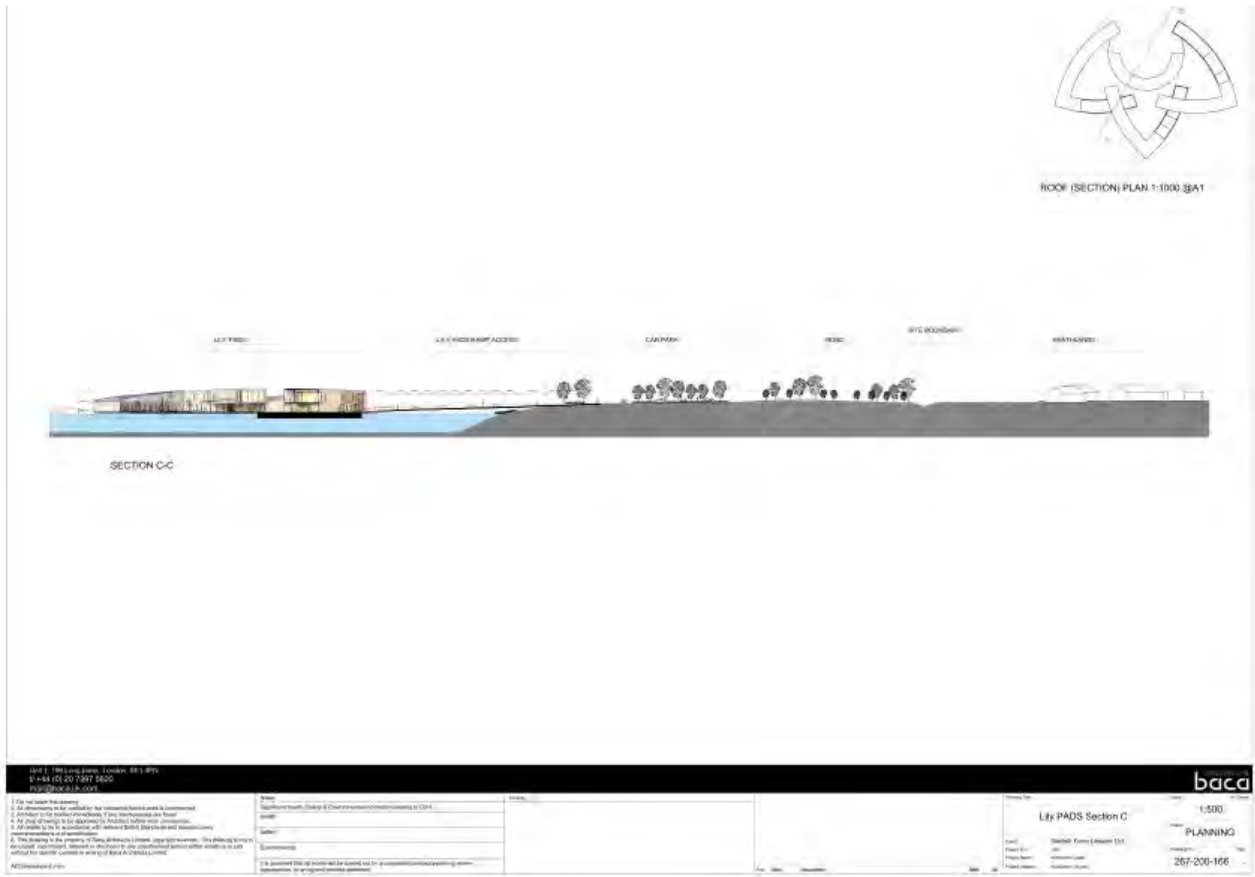


Figure 3.42: Water Level > First floor plan

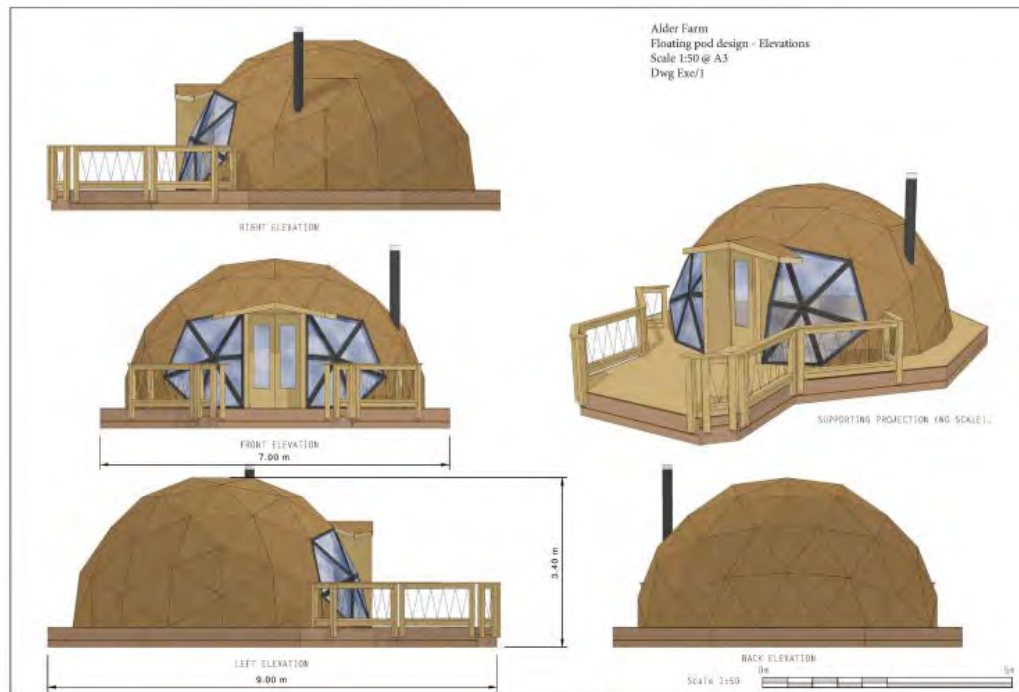
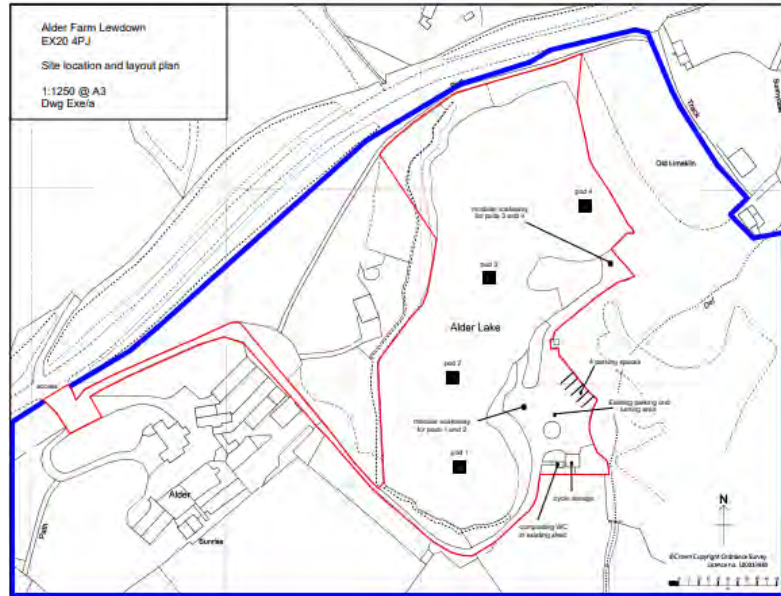


Commentary: This application was withdrawn. Again, this is on a lake and therefore flood risk may not be a main issue.

Appendix 8: 4 floating holiday pods

8.1 Summary

[Planning application: 1028/21/FUL - Planning Page for DEF | West Devon Borough Council \(planning-register.co.uk\)](#)



8.2 Commentary

Note that this looks like it is a building on a raft or pontoon – category C. The EA response confirmed that this lake is flood zone 1 and therefore flood risk is not an issue. This was subject to an appeal, but not in relation to flood risk:

[Reference: APP/Q1153/W/21/3278604 \(planninginspectorate.gov.uk\)](#)

Appendix 9: Environmental Agency's considerations for planning applications for floating buildings

Main considerations

Our commentary on planning applications for floating structures should consider how the development could affect flood risk off site, as well as how flood risk could impact the development itself. Considerations include:

- The nature of the flooding in the proposed location and the impact it could have on the development and its users
- What needs to be done to ensure it is safe in the event of flooding in the proposed location in the context of its users
- What needs to be done to ensure the floating structure will be adequately secured in the event of a flood in the proposed location, considering the risk if the proposed development becomes mobile in the event of a flood (for example, if downstream of the location there are bridges, if the structure became mobile it could cause a blockage and increase flood risk elsewhere)

Purpose-built floating structures that cannot be used for navigation (e.g. floating mobile homes or chalets) are often attached to pontoons and therefore more susceptible to being damaged and swept away in a flood. This places their occupants and others at greater risk.

Where floating structures are proposed, it is our preference that they should be passive structures rather than require any active intervention by a third party to enable their floating function (e.g. development rises and falls with the water level without any active intervention to enable this to happen).

Replacement dwellings

For permanent floating buildings (such as those on piles which rise and fall with the water level), for permanent occupation, we should regard such proposals as 'betterment' if replacing an existing home. It is up to the LPA to determine if a floating building is permanent or temporary.

This aside, the development proposals should still aim to address the main considerations in the previous section to ensure that the development is safe and does not increase risk elsewhere.

Access and Egress

Floating structures will need to offer safe access and egress routes to non-flooded areas should, for example, power or water supplies be lost which

make the house no longer safe or habitable. The flood risk assessment (FRA) with the application should demonstrate that the requirements of the PPG can be met.

The LPA will need to ensure that areas needed for safe access and egress are kept free of development. If a flood warning and evacuation plan is required to achieve safe access and egress, then we should ask the Council to consult with its emergency planners.

**Floodplain
compensatory
storage**

In fluvial situations, the FRA will need to show that floodplain compensatory storage will be provided for at least equal displacement of the loaded structure.

We should also be satisfied that the building or structure does not obstruct flows, does not present a risk of breaking free and obstructing flow channels and access, exit, evacuation and rescue are practicable.

**Further safety
considerations**

The main method that floating developments use to minimise the impacts of flooding is by rising above the floodwater therefore preventing the floodwater from entering the building altogether. However, the building is still at risk from flooding which could threaten its integrity and the safety of its occupants.

On both fluvial and tidal floodplains, the floodwater's depth, velocity and the presence of moving debris will influence the overall safety of the design. The PPG contains advice on making developments safe.

During a flood, debris such as large branches or cars, which can be carried by floodwater, may hit the structure above or below the waterline. At high velocities this could damage the structure, including the under-croft area or tanks which may provide the floatation. The potential 'downstream' effects on flood risk of floating buildings and residential moorings should also be taken into account within an FRA.

After a flood, the structure will settle back down upon its foundations. However if debris has come to rest underneath this will be trapped, potentially resulting in the development not settling evenly. This can cause structural stress and make it very challenging to remove the debris. This would be a particular risk for buildings using stilts or piling as a mechanism to retain a structure in place. The design would also need to ensure its anchorage mechanism can withstand the floodwater velocities.

It is not within our remit to endorse the use of a floating structure for a type of development. This would be a matter for LPA to address.

Maintenance

The responsibility and cost of long term maintenance is likely to rest with the householder, who will need to ensure the building will function properly throughout its design lifetime.

There is a risk that routine maintenance may not be undertaken or key parts of the structure (e.g. the under-croft) cannot be accessed and inspected.

A fault or failure in any part of the design, which compromises the structure's ability to operate properly, may only become apparent during a flood. The LPA should satisfy itself that the structure can be maintained over its lifetime and apply appropriate conditions.

Permitting requirements

Flood Risk Activity Permit

Floating structures in the channel of a Main River or within byelaw distance will require a Flood Risk Activity Permit under the Environmental Permitting (England and Wales) Regulations 2016.

A permit is unlikely to be granted for residential units in the channel of a Main River due to the potential issues they may cause with obstructions to flow and restricted access for maintenance (e.g. vegetation clearance and removal of debris from the channel).

There may also be fisheries, navigation, water quality and aquatic biodiversity issues which we need to consider in responding to consultations.



Broads Local Plan
Local Infrastructure Report
February 2024

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DRAFT

1. Introduction

Infrastructure includes a wide range of facilities and services including schools, medical facilities, community facilities, open space, roads, railways, cycle paths and flood defences. By its very nature, it underpins everything we do and is fundamental to our daily lives. Infrastructure supports new development and facilitates the growth of jobs and access to technology and services.

The NPPF, at paragraph 20, says:

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: Inter alia

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure)

This report seeks to summarise the needs and approaches to provision of local infrastructure.

A draft version of this report was sent to some stakeholders for a three-week technical consultation. The responses received are at Appendix 1.

2. The Authority's constituent districts and their infrastructure studies

To support their proposals in current Local Plans and to support future proposals in future Local Plans, our District Council's assess the infrastructure requirements. The Broads' housing need number is included within our district's total housing need and the infrastructure needs of that total number for the entire district will be assessed through these studies. The Authority works closely with its constituent districts as Local Plans are produced. Here are the most recent Infrastructure Studies. Please note that North Norfolk District Council do not appear to have such a study on the website.

- [Great Yarmouth Infrastructure Plan \(2020\)](#) - This document identifies the various forms of infrastructure that might be required to meet the level of growth planned in the Great Yarmouth Local Plan Part 2 to 2030. It presents an overview of growth patterns and their infrastructure projects needed to support such growth, their costs and the funding involved with this. This study has been prepared in consultation with infrastructure providers.
- This report is a review of the infrastructure requirements within the Greater Norwich Area: [Greater Norwich Infrastructure Needs Report](#). There is also the [Five Year Infrastructure Investment Plan](#) which identifies the projects from the [Greater Norwich Infrastructure Plan](#) whose delivery is considered to be a priority for achieving the economic growth targets, as set out in the [Joint Core Strategy](#) and the [Greater Norwich City Deal](#).

- [Waveney Infrastructure Study](#) - This document identifies what infrastructure might be required to support the growth ambitions in the Waveney Local Plan. Where possible it identifies the cost, the organisation responsible for delivery, and any potential funding sources. The study has been prepared in consultation with infrastructure providers.
- At the time of writing, North Norfolk District Council were at examination into their Local Plan. Their infrastructure related information can be found here: [Home | 4: Evidence base and supporting documents \(north-norfolk.gov.uk\)](#)

It should also be noted that LPAs are required to produce Infrastructure Funding Statements each year. The infrastructure funding statement (IFS) must set out the amount of future planning obligation expenditure where funds have been allocated. The BA's Statement is here: [Developer contributions \(broads-authority.gov.uk\)](#).

At the time of writing, the district councils have not asked the Broads Authority to include specific infrastructure in the emerging Local Plan. We will continue to work closely with the District Councils.

3. Norfolk Strategic Planning Framework

As part of the [Norfolk Strategic Planning Framework](#) (NSPF) (January 2021) work is ongoing at a Norfolk-wide level to address the same issues as listed in the NPPF, but from a more strategic view point. Whilst the NSPF looks at strategic infrastructure this report summarises infrastructure at a local level. The following are agreements from the NSPF:

Agreement 21– Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning 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.

Agreement 23 – 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. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require highspeed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 26 - Norfolk 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.

Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues: • Infrastructure • Governance • Heritage • Marine Protected areas • Marine and coastal employment • Sustainable port development • Energy – offshore wind and oil and gas • Access for tourism and recreation • Sustainable fisheries and aquaculture in small harbour towns • AONB and Seascape and landscape (character and natural beauty) • Biodiversity • Marine aggregates • Cabling • Water quality/water supply and sewerage • Climate change/ Coastal erosion and coastal change management

Agreement 28 - 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 Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

As the Local Plan is produced, we will ensure it addresses the agreements set out in the NSPF.

4. Norfolk and Suffolk - Strategic Infrastructure

The [Norfolk Strategic Infrastructure Delivery Plan](#) (NSIDP) (2022) has been produced by Norfolk County Council working with all the local planning authorities and utility providers. It identifies strategic infrastructure requirements and provides an update on the delivery of a range of projects. The projects in the NSIDP reflect the key infrastructure needed to deliver the scale of

growth ambitions outlined in the NSPF. The NSIDP is a working document that will be regularly updated as information becomes available. The NSIDP will help co-ordination, implementation, prioritise activity and respond to any funding opportunities. It will also enable Local Authorities to prioritise the release of revenue funding for the development of scheme information to assist the prospects of successful bids being made for capital funding to deliver further projects. As it concentrates on strategic infrastructure it does not identify the full range of infrastructure required for development.

In Suffolk, there is a public sector led partnership, working with councils and partners to promote countywide economic growth. [Suffolk Growth](#) works at both a strategic and operational level, providing links across our multi-faceted growth agenda. Generally, the partnership work to:

- Connect transport investment and the development of the local economy,
- Ensure public investment in infrastructure and business development support delivers best value (economic, social and environmental) for Suffolk's firms.
- enable growth of the visitor economy and support the rethinking of local high streets to deliver for residents, businesses and tourists, including our ambition to become the UK's first green tourist destination.

The main infrastructure identified that is particularly relevant to the Broads, is the dualling of the Acle Straight. The current local plan has a policy on the Acle Straight and this will be rolled forward.

5. The housing and residential moorings need for the Broads

The NPPF says at paragraph 8 'that a sufficient number and range of homes can be provided to meet the needs of present and future generations.'

The NPPF goes on to say, at paragraphs 60 and 61 'to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay' and 'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signal'.

5.1 Residential dwellings

The 2019 Local Plan was the first Local Plan for the Broads to include a housing need figure. The need figure was 286 dwellings or 11.43 dwellings a year.

According to annual monitoring, we have permitted the following number of net new dwellings:

- 2019/20: 21 dwellings

- 2020/21: 7 dwellings
- 2021/22: 21 dwellings

Most Local Planning Authorities now have their housing need calculated using the Standard Methodology. The NPPG says that the ‘standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply’.

However, the standard method does not apply to the Broads. The NPPG says ‘where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, where local authority boundaries have changed due to reorganisation within the last 5 years or local authority areas where the samples are too small, an alternative approach will have to be used. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels.’

Working with Great Yarmouth Borough Council, who were commissioning work on their housing need at the same time as us, we commissioned ORS Consultants to calculate the housing need for the entire Broads area. The [study study](#) was completed in May 2022¹ and identifies a housing need for the Broads from 2021 to 2041 as follows:

Projected Dwellings needed for the Broads by Local Authority

Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	East Suffolk
105	97	6	68	59	23

Overall housing need for 2021-41 of 358 dwellings, or 17.9 dwellings per annum.

It is important to note that the need for the Broads is part of the need of the districts and is not additional to the need of the districts.

5.2 Residential moorings

The Housing and Planning Act 2016 sets out the requirement to understand the need for those living on boats.

The 2019 Local Plan was the first Local Plan for the Broads to include a residential mooring need figure. The need figure was 63 residential moorings.

¹ A second version was issued in September 2022 to correct some minor typographic and other errors which were found in the original Great Yarmouth Borough Council and the Broads Authority Local Housing Needs Assessment, May 2022. The two reports are the same in every important respect; in particular, the housing need figures are the same in both reports.

According to annual monitoring, we have permitted 12 residential moorings (at Marina Quays in Great Yarmouth).

We commissioned RRR Consultancy to calculate the housing need for the entire Broads area. The study² was completed in July 2022 and identifies a residential mooring need of 48, as follows:

Table 10

Residential moorings need to 2041

Permanent residential moorings need	
2021-2026	45
2026-2031	1
2031-2036	1
2036-2041	1
Total	48

5.3 The Utilities Site

The Utilities Site is a brownfield site in Norwich. It is next to other brownfield sites which have the potential for regeneration. Working with Norwich City Council and Broadland and South Norfolk Councils, a partnership has formed to collectively look at sites in this area – the East Norwich Regeneration Area. Combined with the other four sites, it is fair to say that much infrastructure will be required. A [Masterplan](#) has been produced and at the time of writing, an SPD was being produced. The infrastructure needs of that wider scheme are considered in those two documents.

Development in the Broads may require local specific infrastructure. The Utilities Site will require significant infrastructure and that site is part of a wider regeneration area subject to a Masterplan and emerging SPD.

6. Transport

The NPPG Paragraph 104 says: *Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*

² [Residential Moorings Need Assessment August 2022 \(broads-authority.gov.uk\)](#)

- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

The NPPF at paragraph 85 recognises the difference between rural and urban areas:

Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

6.1 Acle Straight

An important transport consideration is the dualling of the Acle Straight. Whilst on one hand this is local to the Broads, it is also of strategic importance as the road is a Trunk Road. The A47 is the main strategic route linking Norfolk to the midlands and the north (westbound) and central/northern Europe (eastbound). The Authority has an adopted policy relating to this in the Local Plan (2019) which will be rolled forward to the new Local Plan.

6.2 Policies in the Local Plan

New allocations could have local highway network impacts of varying scales. The Authority will work with the relevant Local Highways Authority. Individual allocations will be considered by the Highways Authority. Indeed, the Highways Authority will still assess individual planning applications. Please note that those allocations rolled forward from the 2019 Local Plan that have planning permission (OUL2, STO1 and THU1) are deemed adequate in relation to transport. And all other sites that are to be included in the new Local Plan were assessed through the [Housing and Economic Land Availability Appraisal \(HELAA\)](#) and both Norfolk and Suffolk County Councils as Local Highways Authorities provided comments to consider and take on board when assessing the sites.

Development allocations and development boundaries are located in more sustainable locations where services and facilities can be accessed by modes other than single occupancy cars. The [Development Boundaries Topic Paper](#) is of relevance.

Some dis-used railways allocated in the Local Plan and safeguarded to enable them to be used as recreation routes.

6.3 Public transport, walking, wheeling and cycling.

Public transport is supported, although it should be noted that the scale of growth and the sites allocated in the Local Plan will not be of a scale to generate the need for viable changes to bus routes. In relation to rail, the Local Plan seeks to identify and allocate rail stations. For walking and cycling, please see the Green Infrastructure section. Norfolk County Council is currently consulting on a Walking, Wheeling and Cycling Strategy for Norfolk (December 2023).

6.4 Alternative fuels

Since June 2022, the Building Regulations have been changed so new homes and buildings such as supermarkets and workplaces, as well as those undergoing major renovation, are required to install electric vehicle charge points.

It is not proposed to set a standard for electric vehicle charging points in the new Local Plan for the Broads although there will be a policy relating to fire risk and the design and location of charging points.

6.5 Relevant district documents

Great Yarmouth Borough Council:

[Local Plan Part 2 Transport Modelling](#): The purpose of the study is to assess the impact on the A47 trunk road of three additional allocations that are part of the Great Yarmouth Draft Local Plan 2. The study demonstrates the impact on the A47 trunk road of the following allocations:

- Policy ADA1 – Land to the south of Links Road Gorleston-on-Sea – 500 dwellings;
- Policy ADA4 – Land to the north of the A143 Beccles Road, Bradwell – 600 dwellings; and
- Policy PDP6 – Beacon Park District Centre – (subject to a lapsed planning consent)

The impact of including the three additional allocations either constrained to NTEM growth levels or with unconstrained growth, is to increase the likelihood of traffic congestion around the junction of A47 / Links Road / Beaufort Way.

[Great Yarmouth Transport Strategy and Implementation Plan - 6 April 2020 \(norfolk.gov.uk\)](#): This document sets out the transport vision for Great Yarmouth, highlighting the challenges and opportunities along with the transport infrastructure that needs to be delivered within the short and medium-term to enable growth to come forward sustainably as well as supporting the existing local communities. The transport infrastructure presented in this strategy has been sifted from an initial long-list of options which have been subject to stakeholder engagement, appraisal and prioritised using a bespoke Strategic Assessment tool and the Department for Transport's (DfT) Early Assessment and Sifting Tool (EAST), which compares the Strategic, Economic, Managerial, Financial and Commercial case for each transport option. An Action Plan has then been produced to take forward the identified options along with a series of recommended next steps.

Norwich City Council

[About Transport for Norwich - Norfolk County Council](#): Transport for Norwich is a programme of work to improve accessibility by all forms of transport around the city. The aim is to encourage the use of more sustainable forms of transport, such as public transport, cycling and walking, while also improving the capacity of the road network. It's also designed to stabilise traffic levels and as a result improve air quality around the city. It is a partnership between Norfolk County Council and Norwich City Council, as well as local authorities within Greater Norwich on schemes

in the wider area. Funding is from sources including the Department for Transport, developer contributions, New Anglia Local Enterprise Partnership and local growth funds.

East Suffolk Council

The following evidence was produced to support the Waveney Local Plan.

- Traffic Modelling

Assessing the impact upon the highway network of development planned in the Local Plan and identifying junctions that are likely to experience congestion in the future.

- [Suffolk County Transport Model Forecast Model Report](#) (2017)
Assessing the impact on the highway network from different growth scenarios.
- [Suffolk County Transport Model Forecast Model Report Addendum](#) (2017)
Examining the traffic impact from access options for growth to the south of Beccles.
- [Suffolk County Transport Model Preferred Option Traffic Forecasting Report](#) (2018)
Assessing the impact of the emerging preferred option. It includes updates to the model from the July 2017 reports.
- [Technical Note – Response on Beccles Transport Impact Assessment](#) (2018)
A response to issues raised within the Beccles Transport Impact Assessment, which was commissioned by Worlingham Parish Council.

6.6 Hoveton and Wroxham network improvement strategy

The [Hoveton and Wroxham network improvement strategy \(2020\)](#) identified potential measures to help address existing transport network constraints and transport improvements to facilitate the growth identified in the emerging Local Plans. This work produced some key findings:

- Through traffic is a significant proportion of the journeys.
- The highest quantities of traffic pass through Norwich Road / Stalham Road (A1151) with the majority travelling South towards Norwich.
- There is scope to encourage a greater use of sustainable transport.
- The A1151 Norwich Road / B1140 Salhouse Road mini-roundabout operates close to capacity with high delays in AM peak hour.
- The A1151 Norwich Road / Church Road / Station Road / A1151 Stalham Road junction is affected by high demand from the adjacent signal-controlled pedestrian crossing which creates queues.
- The A1151 Stalham Road / A1062 Horning Road / B1354 Horning Road West double mini-roundabout junction is close to capacity in both AM and PM peak hours and experiences congestion on all arms.

6.7 Transport East

[Transport Strategy 2023-2050](#): Through this strategy, we aim to overcome some of the transport challenges experienced, while also delivering a fit for purpose, high quality, inclusive and sustainable transport network that will be able to accommodate future growth in the area.

Strategic priorities and linked goals are as follows:

Decarbonisation to net-zero

Working to achieve net zero carbon emissions from transport, building on our status as the UK's premier renewable energy region. Our decarbonisation pathway underpins the other three pathways in the Strategy.

Goal 1: Reduce demand for carbon intensive trips through local living; making it easier for people to access jobs and services locally or by digital means

Goal 2: Shift modes by supporting people to switch from private car to active and passenger transport, and goods to more sustainable modes like rail

Goal 3: Switch fuels with all private, passenger transport, fleet and freight vehicles switching to net zero carbon fuels at the earliest opportunity

Goal 4: Zero carbon growth by supporting authorities and developers to plan, locate and design new development that reduces the need for people to make carbon-intensive trips

Connecting growing towns and cities

Providing enhanced links between our fastest growing places and business clusters. Improving access for people to jobs, suppliers, services, and learning; enabling the area to function as a coherent economy and improving productivity.

Goal 5: Improve connections and access within our urban centres through better walking, cycling and passenger transport, supporting sustainable access to services, education, training, jobs and leisure

Goal 6: Deliver faster and more reliable connections between our growing places and to the rest of the UK, to support business growth, skills development and employment

Goal 7: Fully integrate transport networks, services and operations across the Transport East region, through a customer-focused approach, enabling seamless and safe end-to-end journeys by sustainable modes that are attractive to all.

Energising coastal and rural communities

A reinvented sustainable coast for the 21st century which powers the UK through energy generation. Supporting our productive rural communities and attracting visitors all year round.

Goal 8: Increase accessibility for rural communities to education, training, services and jobs through; better ways of taking people to places sustainably, supporting more local trips through

closer provision of goods and services, supporting regional partners and the digital sector to provide alternative options to travel

Goal 9: Improve connections along our 500miles of coastline, and connect our coastal communities to the rest of the region and the UK, supporting levelling-up and boosting our coastal industries.

Unlocking international gateways

Better connected ports and airports to help UK businesses thrive, boosting the nation's economy through better access to international markets and facilitating foreign investment.

Goal 10: Improve connectivity, journey time and reliability for freight, passengers and employees to ports and airports

Goal 11: Move goods and people sustainably to ports and airports by shifting modes including to rail and water

Goal 12: Increase the use of alternative fuels for both port and airports, and for the vehicles moving people and goods onwards from international gateways.

[Strategic Investment Programme \(February 2023\)](#): This document sets out the proposed approach to a Strategic Investment Programme to enable delivery of the Transport Strategy. It is a supporting document for the Transport East Strategy, and the main document will be reviewed every three years or in response to emerging guidance and policy; the Appendices to this document will be updated annually.

The scale of growth proposed will not have strategic transport impacts. There may be some more local highway changes or improvements that could be needed as a result of schemes. We will contact the relevant Highways Authority regarding any allocations that are proposed. We will ensure we keep up to date with any relevant documents and strategies.

7. Telecommunications

NPPF paragraph 114 says: *Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).*

7.1 Mobile coverage

In 2020, 87% of those over 16 had a smartphone³. Whilst there remain many mobile “not-spots” in Norfolk and Suffolk (some rural areas and parts of the coast in particular), the use of smartphones to access the internet has increased hugely; in 2015, smartphones overtook the use of laptops as the number one device to access the internet in the UK⁴.

Norfolk County Council⁵ commissioned an independent study in 2018, where the mobile signal was tested with consumer devices around Norfolk to establish a true picture of mobile voice and data coverage. They are using this information to work with mobile providers to improve coverage and tackle ‘not spots’ across the county. The survey covered:

- More than 3,400 miles of Norfolk’s roads
- 30 railway stations
- Main railway lines
- Enterprise zones
- Popular tourist destinations

The survey showed that phone signals for voice calls in Norfolk were an issue, with only 82% of call attempts being successful. The call failures happened throughout the county, across a broad range of locations and for all operators. Norfolk County Council provided the information from the survey in [interactive maps](#), allowing residents to see which of the four major providers - EE, Telefonica/O2, Three and Vodafone – have the best coverage in the area for the needs.

Suffolk County Council do not seem to have equivalent information relating to mobile coverage.

7.2 Broadband

The use and demand for mobile and home fast internet connections will continue to grow exponentially - with increased dependency on technology in our everyday lives. Access to fast broadband is a vital component of infrastructure in today’s world. It is key to growing a sustainable local economy, vital for education and home working and an increasingly central part of community cohesion and resilience, particularly in the rural areas of the county. The availability, reliability and speed of mobile and fixed broadband provision is now a key consideration for most house buyers as well as tourists and many view it as essential as the traditional utilities. Similarly, it is also a key concern for the business sector. The services offered by Local Authorities, utility companies and banking services are increasingly reliant on digital infrastructure to provide services and interact with their customers. Planning policy can play an important role in helping to achieve the transformation in mobile and broadband provision. Local Planning Authorities have a pivotal role to play in encouraging and supporting developers to future-proof their developments and maximise their value by installing high-speed broadband

³ <https://www.statista.com/statistics/956297/ownership-of-smartphones-uk/>

⁴ <http://media.ofcom.org.uk/news/2015/cmr-uk-2015/> CMR UK 2015.docx (ofcom.org.uk)

⁵ <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/campaigns/digital-connectivity/mobile-phone-coverage>

and by working with mobile telecoms companies to ensure there is a comprehensive and reliable network that minimises the impact on the landscape.

Not all urban areas are well-connected; as an example, new residential development does not always have broadband connectivity installed up-front and rural areas are often less well-served by broadband, and the low speed of connectivity can be an issue in both urban and rural areas. Not all properties in a rural county – particularly isolated farmhouses and small hamlets - will be feasible financially to connect up to a broadband network, although there are some examples of the residents of small villages working together to pool funding to secure and deliver fibre broadband⁶.

In Norfolk, [Better Broadband for Norfolk](#), [Local Full Fibre Network](#) and [Project Gigabit](#) have extended and will continue to extend the fibre broadband network to homes and businesses across the county where it wasn't economically viable for commercial companies to provide access. Funded through Norfolk County Council, BT and BDUK (Broadband delivery UK), the project is expected to have a huge positive impact on the economic and social development of Norfolk. The latest info taken from the [Think Broadband](#) data shows at October 2023, 96.7% of premises in Norfolk can now access superfast broadband. This map shows the upgraded postcodes to enable fast broadband and where it's planned for future delivery [Better Broadband for Norfolk coverage check \(arcgis.com\)](#).

In Suffolk, Suffolk's overarching aspiration is to deliver full coverage of better broadband services to all premises in Suffolk as soon as possible. The Better Broadband for Suffolk Programme⁷, run by Suffolk County Council, secured around £24m of public money (SCC and Central Government), which was been used to leverage further private sector investment from BT through a public procurement process. Here is the Programme history:

- In 2013, we achieved 50% superfast broadband coverage in Suffolk.
- In 2015, we reached 85% coverage.
- In 2020 the Better Broadband for Suffolk programme reached its 100,000th customer.
- In 2021, phase 3 of the Better Broadband for Suffolk programme started - this phase completed in early 2023 and extended coverage in the county past 98% (with speeds of 24Mbps or greater). To see the latest broadband coverage figures in the county, please go to [the Think Broadband website](#).

Project Gigabit is a £5 billion government infrastructure project aimed at delivering fast and reliable gigabit-capable broadband to homes and businesses in the hardest-to-reach parts of the UK. On 1 July 2023, it was announced that the contract for Suffolk, representing a £100 million investment in Suffolk, has been awarded by BDUK to CityFibre to provide new high speed Gigabit broadband capabilities. This will benefit around 80,000 properties across rural Suffolk.

⁶ More information can be found here: <https://betterbroadbandsuffolk.com/alternative-options/community-schemes> Fibre Community Partnership | Openreach

⁷ <https://www.betterbroadbandsuffolk.com/about>

7.3 Fibre to the premises

Traditionally the main challenge to installing high speed broadband in new developments, particularly smaller developments and/or those in rural areas, has been that of cost and the complexities of working with the providers. Although the cost to developers of installing high speed broadband at larger sites can be cost neutral, the cost per unit increases on smaller developments where economy of scale is reduced. In addition, installing fibre cabling for superfast broadband across private land can often double the per-kilometre cost. Fibre to the Premises (FTTP) uses fibre-optic cable direct from the exchange to a business or home. Unlike FTTC (fibre to the Cabinet), there is no use of the traditional copper wire from a street cabinet. While the copper wire from the cabinet to the premises makes for an economical alternative, it doesn't compare with the speeds that FTTP offers. While an FTTC connection offers up to 76Mbps, the full fibre option reaches up to 1000Mbps or 1Gbps. Not all homes or businesses need those speeds but the ultrafast option allows for future-proofing and growth. FTTP was designed to be easily expanded and improved upon so that bandwidth has more room for growth than the hybrid FTTC option. [Openreach](#) offer to install Fibre to the Premises (FTTP) free of charge to all new housing developments of 20 or more homes and an improved pricing structure all the way down to two homes.

A change to building regulations commenced from 26 December 2022. These changes mandate the installation of a gigabit-ready telecoms infrastructure during the construction of new homes.

7.4 5g

5g follows previous generations of mobile technology such as 3G, which led to the launch of smartphones, and 4G, which enabled faster browsing, allowing us to do things like watching videos on the move. All four major UK mobile networks have launched 5G services. Technology firms are also rolling out 5G-ready devices. 5G is much faster than previous generations of wireless technology. But it's not just about speed. 5G also offers greater capacity, allowing thousands of devices in a small area to be connected at the same time. The connectivity and capacity offered by 5G is opening up the potential for new, innovative services.

5G will use a wide range of frequency bands⁵, such as 700MHz, 3.4GHz and 30GHz.

The higher frequencies of 5G will have a shorter range. Achieving the levels of network capacity where there is a very high volume of network traffic will over time increasingly rely on smaller cells situated nearer to the ground on lampposts and other street furniture, in addition to rooftop and ground-based masts.

Whilst more base stations will be required, Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which can be rolled out on existing infrastructure where possible. The initial phase will be to strengthening the existing infrastructure or rebuilding the network where required, then densification for major areas using small high frequency cells which will be rolled out in areas with high demand.

7.5 Recent Government Consultations

In April 2021, the Government consulted on [changes to permitted development rights for electronic communications infrastructure: technical consultation](#). This consultation sought views on proposed planning reforms that will allow the deployment of telecoms equipment to be quicker whilst ensuring that there are appropriate environmental protections and safeguards in place.

In January 2021, the Government consulted on [changes to the Electronic Communications Code](#). Through this consultation, the Department for Digital, Culture, Media and Sport sought views on whether changes to the Electronic Communications Code can help ensure that the UK has sufficiently robust electronic communications networks to deliver the coverage and connectivity consumers and businesses need.

Following these consultations, the [Product Security and Telecommunications Infrastructure Act 2022 \(legislation.gov.uk\)](#) was produced and has received Royal Assent.

7.6 NSPF and telecommunications

The Norfolk Strategic Planning Framework has two relevant agreements:

- Agreement 24 - To support the high-speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.
- Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations

7.7 Codes of practice

[Cabinet Siting and Pole siting Code of Practice Issue 2](#) (2016): The purpose of this Code of Practice is to provide guidance to Code Operators, agents, contractors, planning and highway authorities and other persons entitled to be notified of the proposed deployment of electronic communications apparatus on the siting, keeping, maintenance and use of above the ground electronic communications apparatus, specifically cabinets and poles utilised by fixed line Code Operators, not including masts utilised by mobile Code Operators (which falls under a separate code of practice).

[Code of Best Practice on Mobile Network Development in England](#) (2016): The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social

inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties. The Code applies to all forms of wireless development, but very obviously is most relevant to proposals for new masts or base stations and significant additions, extensions or replacements of existing sites.

There is a policy that relates to telecommunications infrastructure emphasising the importance of addressing impacts on landscape in the Broads. The Local Plan will reflect the NSPF.

8. Security

Paragraph 97 of the NPPF says: *Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:*

a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and

b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

At this stage, the Authority is not aware of any specific security related issues that the Local Plan needs to address. Norfolk and Suffolk Architectural Liaison Officers are consulted at all stages of producing the Local Plan and their responses will be considered and addressed as appropriate.

9. Waste

The [National Planning Policy for Waste](#) states ‘Positive planning plays a pivotal role in delivering this country’s waste ambitions’

The NPPG states: *While such authorities may not have the planning functions in respect of the preparation of Local Plans covering waste, or dealing directly with waste planning applications, they must have regard to national planning policy for waste and are expected to help deliver the Waste Hierarchy. This might include:*

- *working constructively with waste planning authorities to identify and protect those sites needed for waste management facilities. Local planning authorities should consider the need for waste management alongside other spatial planning objectives*
- *integrating local waste management opportunities in proposed new development*
- *considering, where relevant, the likely impact of proposed, non-waste related development on existing waste management sites and on sites and areas allocated for waste management*
- *promoting sound management of waste from any proposed development, such as encouraging on-site management of waste where this is appropriate, or including a planning condition to encourage or require the developer to set out how waste arising from the development is to be dealt with*
- *including a planning condition promoting sustainable design of any proposed development through the use of recycled products, recovery of on-site material and the provision of facilities for the storage and regular collection of waste*
- *ensuring that their collections of household and similar waste are organised so as to help towards achieving the higher levels of the waste hierarchy.*

The Broads Authority is not the minerals and waste authority. The Authority's constituent districts are responsible for collecting waste from domestic properties while Norfolk and Suffolk County Council are the Waste Disposal Authorities and are therefore responsible for disposing of refuse as well as being the Minerals and Waste Local Planning Authority, producing Minerals and Waste Local Plans.

The County Councils are consulted at each stage of the Local Plan production and their responses will be considered and addressed as appropriate. There are some waste consultation areas that are in the Broads, which the Broads Authority are aware of and will act upon as required.

9.1 Norfolk County Council

The [Norfolk Core Strategy and Minerals and Waste Development Management Policies DPD 2010-2026](#) (the 'Core Strategy') was adopted in September 2011. The [Norfolk Minerals Site Specific Allocations DPD](#) and the [Norfolk Waste Site Specific Allocations DPD](#) were both adopted in October 2013. The County Council are in the process of reviewing the three documents and bringing them together into one local plan. The Broads Authority will monitor progress and address any relevant policies or requirements as we produce our Local Plan.

The following table identifies the safeguarded waste management sites (see section 10.4 for safeguarded wastewater sites) where either the site itself or the consultation area for the site falls within the Broads Authority Executive Area.

SITE NAME	OPERATOR	TYPE
Caister on Sea (Household Waste Recycling Centre)	Norse LTD	Waste management site Consultation Area
Great Yarmouth-MT Skips	M T Skips	Waste management site

SITE NAME	OPERATOR	TYPE
West Caister (Materials Recycling)	Norfolk County Council	Waste management site Consultation Area
Cantley (inert landfill)	British Sugar PLC	Waste management site and 250m consultation Area

9.2 Suffolk County Council

The [Suffolk Minerals and Waste Local Plan](#) was adopted in 2020. This does not propose any minerals or waste sites in the Broads area. In addition, there are no existing waste or minerals management facilities in the Broads. There seems to be some wastewater treatment plants safeguarding areas that could be of relevance to the Local Plan.

9.3 The Local Plan and waste

Generally, the Local Plan supports the waste hierarchy. In terms of construction waste, as it accounts for a high proportion of waste that ends in landfill, it seems prudent to improve how that is considered in the Local Plan.

The Local Plan will roll forward the current general support of the waste hierarchy as well as ensure any waste allocations in the Local Plans are considered. There is potential to improve reference to construction waste.

10. Water

Adequate water and wastewater infrastructure are needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

The NPPG says:

What are the water supply, wastewater and water quality concerns that plans need to address?

These will vary depending on the character of the local area, the [type of issues the plan covers](#) and the contribution that can be made to a [‘catchment-based approach’](#) to water. Wastewater treatment plants are waste developments and handled by the waste planning authority. In plan-making, there are a number of broad considerations relevant to water supply and water quality:

- [infrastructure](#) (water supply and wastewater)
- [water quality](#)
- [wastewater](#)
- [cross-boundary concerns](#)
- [strategic environmental assessment and sustainability appraisal](#)

- *habitats regulations assessments.*

Early discussions between strategic policy-making authorities and water and sewerage companies can help to ensure that proposed growth and environmental objectives are reflected in company business plans. Growth that requires new water supply should also be reflected in companies' long-term water resources management plans. This will help ensure that the necessary infrastructure is funded through the [water industry's price review](#).

Strategic policy-making authorities will also need to consider the objectives in the government's [25 Year Environment Plan](#) to reduce the damaging abstraction of water from rivers and groundwater, and to reach or exceed objectives for rivers, lakes, coastal and ground waters that are specially protected.

Paragraph: 002 Reference ID: 34-002-20140306

Revision date: 22 07 2019

Water is a particularly important consideration in the Broads. Abstraction to serve development and wastewater can potentially have a profound impact on the quality of the system. Development and activities within the catchment can impact on the Broads, for example agricultural practices, even if located some way from the Broads, can lead to sediment and chemicals washing downstream to the Broads which can lead to reduced water depth, turbidity and impact on the aquatic system through excess nutrients. These are all matters which planning can influence potentially with close cooperation with neighbouring Local Planning Authorities.

10.1 Water supply

The following table summarises water supply in the Broads Authority Executive Area:

Document	Description	What it says about the Broads Executive Area
<p>The Water Stressed Areas - 2021 Classification (Environment Agency, 2021).</p>	<p>This identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.</p>	<p>The companies determined to be in areas of serious water stress are:</p> <ul style="list-style-type: none"> • Anglian Water – East Anglia • Essex and Suffolk Water
<p>Essex and Suffolk Water Resource Management plan (2019) (please note that the next version is being produced)</p>	<p>Essex and Suffolk Water and Anglian Water Services have a statutory duty to prepare and maintain a Water Resources Management Plan (WRMP) under the Water Resources Management Plan Regulations 2007. These set out how the companies plan to maintain the balance between supply and demand over the next 25 years.</p>	<p>Some of the Broads are in the Northern and Central Water Resource Zone. Demand in the WRZ is heavily influenced by the large population centres of Lowestoft and Great Yarmouth.</p> <p>In the Suffolk Northern Central WRZ, the flexibility over utilisation of the three main surface WTWs at Lound, Barsham and Ormesby provides a buffer to impacts from peak demands. Subsequent to the 1995-1997 drought, significant investment was made in network improvements and enhancement of security of supply within the groundwater fed zones of Hartismere and Blyth. This effectively removed any residual peak/critical period concerns, and hence no ADPW or similar peak scenarios are presented in this WRMP.</p> <p>The baseline supply demand balance graph for the Northern Central WRZ showed that a supply surplus was maintained across the full planning period.</p> <p>At the time of writing, the next WRMP was being produced. This is likely to imply that there is a need for water efficiency measures going forward.</p>

Document	Description	What it says about the Broads Executive Area
<p>Anglian Water Services Water Resource Management Plan (2019) (please note that the next version is being produced)</p>		<p>North Norfolk Coast and Norwich and the Broads Water Resource Zone are the relevant water resources zones (WRZs).</p> <p>Baseline shows that these two WRZs are in deficit by 2044-45.</p> <p>Different stages of the plan will see different WRZs in surplus deficit. The two relevant WRZs are shown to be in surplus after the demand management strategy.</p> <p>Despite our ambitious demand management strategy, the scale of the challenge is such that we still need carefully targeted investment in supply side capacity.</p> <p>The entire area is shown to be in surplus after supply side options are included.</p> <p>The WRMP, at the time of writing, was being updated.</p>
<p>Anglia District River Basin Management Plan (2022).</p>	<p>The Anglian river basin district (RBD) river basin management plan describes the challenges that threaten the water environment and how these challenges can be managed.</p>	<p>Significant water management issues are listed as:</p> <ul style="list-style-type: none"> • Physical modifications • Pollution from waste water • Pollution from towns, cities and transport • Changes to the natural flow and level of water • Negative effects of invasive non-native species • Pollution from rural areas <p>The need for water efficiency measures features strongly in the document.</p>

Document	Description	What it says about the Broads Executive Area
Meeting our Future Water Needs: a National Framework for Water Resources (2020)	The National Framework explores the long-term needs of all sectors that depend on a secure supply of water. This includes public water supplies provided by water companies to customers' homes and businesses; direct abstraction for agriculture, electricity generation and industry; and the water needs of the environment.	According to the Environment Agency, if no action is taken between 2025 and 2050, around 3,435 million additional litres of water per day will be needed in England to address future pressures on public water supply; within this figure it is estimated that the East of England will require an additional 570 million litres per day to meet the needs of residents and the agricultural sector, industry and energy sector.

Another source of information is existing water cycle studies completed by our districts:

District	Evidence	Information/policy
Broadland	WCS (2021) was produced for Norwich, SN, BDC, Norfolk County Council and the Broads Authority.	The water efficiency assessment can be used by GNA to develop a water use policy that requires developers to build new homes to meet the higher Building Regulation standards of 110l/h/d as a minimum, improving on it where possible and to consider working with AWS and other stakeholders to develop further options for retrofitting existing properties with efficiency fixtures and fittings. The Emerging Local Plan says this in policy 2: Housing development will meet the Building Regulations part G (amended 2016) water efficiency higher optional standard.
Norwich		
South Norfolk		
North Norfolk	Not aware of any evidence.	Core Strategy and Development Management DPD policy relates to Code for Sustainable Homes. There is an emerging Local Plan under production which seeks 110l/h/d.

District	Evidence	Information/policy
GYBC	<p>The Water Cycle Scoping Study was a stage 1 report and was completed in 2009. This was not taken any further as the issues raised in the Scoping study were not significant to development plans at the time. This did include the Broads Authority Executive Area.</p>	<p>The emerging Local Plan (in examination) includes policy E7: Water conservation in new dwellings and holiday accommodation which says that new residential development, and holiday accommodation in buildings, will be supported only where it meets the higher water efficiency standard of requirement of 110 litres per person per day.</p>
Waveney (now East Suffolk council)	<p>Water Cycle Study 2017</p>	<p>The study concludes that a policy could be developed that ensures all housing is as water efficient as possible, and that new housing development should go beyond mandatory Building Regulations requirements, ideally to 110 l/h/d optional Building Regulations requirements where possible.</p> <p>Policy WLP8.28 – Sustainable Construction says that all new residential development in the District should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day unless it can be demonstrated that it is not viable or feasible to do so.</p>

10.2 Norfolk Strategic Planning Framework 2021

There is an agreement in the [Norfolk Strategic Planning Framework](#) that relates to water use.

Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning 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.

According to The Housing Standards Review: Cost Impacts report that was produced for the Department for Communities and Local Government in 2014, the uplift in cost between 125 and 110 litres per person per day is just £9 per dwelling. It is noted that was in 2014 and the cost could be less now. The Government's Environmental Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress.

10.3 Water Resource East

WRE's [updated position statement \(February 2021\)](#) promotes a vision for Eastern England to have sufficient water resources to support a flourishing economy, a thriving environment and the needs of its population, and for the region to be seen as an international exemplar for collaborative integrated water resource management.

On an average day, in a dry year, the total consumptive demand for water in the WRE region is equivalent to 2,311 million litres (megalitres) per day. Most of this water (85%) is used for public water supply (PWS). Most of the rest is used for spray irrigation (8%), power generation (3%) and in the manufacturing, food and drink sectors (2%).

FUTURE WATER CHALLENGES FOR EASTERN ENGLAND

- Housing growth
- Agricultural growth
- Energy sector
- Systematic conservation planning
- Climate change

OPTIONS FOR MEETING FUTURE DEMAND FOR WATER IN EASTERN ENGLAND

- Water company leakage
- Water efficiency measures
- Supply options

Looking forward to the 2050s and beyond, our Initial Resource Position Statement estimated that up to an additional 1,656 megalitres of water could be needed per day. The largest drivers of this were abstraction reductions to drive environmental restoration and enhancement (500 megalitres per day), housing growth (408 megalitres per day) and additional water for irrigation (288 megalitres per day).

The Authority will continue with the 110l/h/d water usage requirement for new development. We will explore the potential to go lower than 110l/h/d.

10.4 Wastewater and treatment

Water quality is a key consideration in the Broads and the Local Plan will look into drainage. With regards to how wastewater is transferred from a property, due to the low-lying nature of the area and remoteness of some settlements connection to a public sewer is not always possible in the Broads. The alternative disposal methods employed can have a significant local impact on water quality.

Anglian Water is implementing a series of first-time sewerage projects of some villages in the Broads Area. Stokesby for example is one area that has benefitted from this project.

Through discussions with North Norfolk District Council, Anglian Water Services and the Environment Agency, it is apparent that there are capacity issues at the Horning Knackers Wood Water Recycling Centre. This Water Recycling Centre discharges to the River Bure and contributes nutrient loads to the downstream watercourses as well as the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC)/ Broadland Special Protection Area (SPA). Both Anglian Water and the Environment Agency agree that the Horning Knackers Wood Water Recycling Centre (WRC) does not currently have capacity to accommodate further foul flows. Horning Knackers Wood WRC is in protracted exceedance of the volumetric permit due to the continued ingress of surface and groundwater. This means that development that will increase the foul water load in the Horning area cannot come forward and cannot be permitted. The Joint Position Statement and Statement of Fact can be found here:

- [Joint Position Statement on Development in the Horning Knackers Wood Water \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk/joint-position-statement-on-development-in-the-horning-knackers-wood-water)
- [Horning Statement of Fact - Revised August 2023 \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk/horning-statement-of-fact-revised-august-2023)

There are also other treatment works, identified in the Norfolk⁸ and Suffolk⁹ Minerals and Waste planning documents that are of relevance to the Broads. The list of safeguarded wastewater sites and consultation areas in Norfolk relevant to the Broads Authority Executive Area is below. There are no wastewater sites or wastewater consultation areas in the Broads part of Suffolk.

SITE NAME	OPERATOR	TYPE
Acle (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
Belaugh (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area

⁸ <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/adopted-policy-documents> Minerals and waste planning policies - Norfolk County Council

⁹ <https://www.suffolk.gov.uk/planning-and-environment/planning-applications/minerals-and-waste-development-planning/> Suffolk Minerals and Waste Plan - Suffolk County Council

SITE NAME	OPERATOR	TYPE
Horning (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
Stalham (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
West Caister (water recycling centre)	Anglian Water Services Ltd	Wastewater Consultation Area
Whitlingham (water recycling centre)	Anglian Water Services Ltd	Wastewater Consultation Area

10.5 Nutrient neutrality

Alongside all other local planning authorities in Norfolk, the Broads Authority received a letter in 2022 from Natural England concerning nutrient pollution in the protected habitats of the Broads Special Area of Conservation and Ramsar site.

The letter advised that new development within the catchment of these habitats comprising overnight accommodation has the potential to cause adverse impacts with regard to nutrient pollution. Such development includes, but is not limited to:

- new homes,
- student accommodation,
- care homes,
- tourism attractions,
- tourist accommodation,
- permitted development (which gives rise to new overnight accommodation) under the Town and Country Planning (General Permitted Development) (England) Order 2015, and
- Any development not involving overnight accommodation, but which may have non-sewerage water quality implications.

The Conservation of Species and Habitats Regulations 2017 require local planning authorities to ensure that new development does not cause adverse impacts to the integrity of protected habitats such as the Broads prior to granting planning permission. At present there are no identified mitigation solutions available locally to resolve these impacts.

Whilst the Authority assesses the implications of these matters, it cannot lawfully conclude that development within the catchment of the Broads Special Area of Conservation and Ramsar site will not have an adverse effect. Therefore, until these matters are resolved the Authority will not be able to grant planning permission for developments comprising overnight accommodation within the affected catchments.

The fundamental issue being phosphorous and nitrogen in the water causing eutrophication. Water Recycling Centres have been identified as one of the causes of nutrient enrichment.

Mitigation schemes are being worked up, both locally and nationally which may involve nature-based solutions as well as other solutions that involve infrastructure.

The Authority will address water quality in the Local Plan. The Authority will keep updated regarding Horning Knackers Wood Water Recycling Centre. The Local Plan will reflect Nutrient Neutrality.

11. Flood Risk

11.1 Flood Risk

Approximately 82.5% of the Broads Authority Executive Area is covered by flood zone 3 (3a & 3b). This equates to 25,472 hectares. The Broads Authority boundary is tightly drawn around the edge of the functional floodplain¹⁰. The extent and nature of flood risk, with significant areas of 'functional floodplain', means that flood risk is a major constraint on development in the Broads. Flood risk includes all type of flood risk, so in addition to tidal and fluvial sources of flood risk, there is also surface water, reservoir and groundwater sources of flood risk.

The flood risk in the Broads is predominately from fluvial and tidal sources which are interlinked. However, other sources of flood risk include groundwater and surface water. 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 Broads area is defended by flood defence embankments, which are maintained by the Environment Agency to reduce flooding. The flood defences, where they exist, only reduce the risk of flooding through containing some water to a given area and will never eliminate the flood risk; this has been the case historically within the Broads.

Working, living and visiting the Broads have been, and will continue to be, activities that have co-existed with the risk of flooding. However, any new development (which includes change of use, etc) must be in line with government policy and minimise flood risk by avoidance where inappropriate development is directed away from areas of highest risk. In the Broads area, this means identifying the risks from flooding and ensuring appropriate development is at a low a risk level as possible while being compatible with the wetland and water-based environment.

The Broads is not subject to open sea conditions (relating to tidal range and wave action) but much of the Broads are tidally influenced fluvial waterbodies.

The Broads is not subject to open sea conditions (relating to tidal range and wave action) but much of the Broads are tidally influenced.

The flood probability mapping carried out within the SFRA does not signify the degree of hazard likely to be experienced in the Broads Authority area, especially in the more upstream catchment areas and those areas not at risk of breaching of coastal defences, because it does

¹⁰ The NPPG defines Zone 3b The Functional Floodplain as: This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise:

- land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or
- land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).

not quantify depth or water velocity. Hazard, or “danger to people”, is a function of depth and velocity. Hazard is very site specific and could vary greatly over a relatively small area due to the presence of drains, dykes, quay-headings, flood banks, etc. Hazards can be hidden by floodwaters and a site-specific Flood Risk Assessment will need to measure this.

The typical Broads river has a permeable catchment¹¹, is groundwater dominated¹², and is a slow responding watercourse with a slow increase and decrease of flow in response to rainfall. Although tidal surges can develop rapidly within 6-12 hours because of the movements of weather systems in the North Sea, the Environment Agency Flood Warning System covers the whole of the Broads area which could provide early warning (for fluvial and tidal flooding). Signing up to this service is voluntary or it may be a requirement of planning permission.

The nature of flooding in the Broads is such that flood water is likely to have a slow velocity, may be shallow in depth and may be low hazard (depending on topography), unless it is in or beside a breach in defences where the flow will be greater and the risk would subsequently be higher.

Some people living and working within the Broads are historically familiar with the water environment and are unlikely to be surprised or alarmed by the possibility of floods or rising water levels or may be more prepared. That being said, others may not have had any experience of flooding and historic knowledge and historic connections does not necessarily lower people's vulnerability, it can also lead to complacency which increases vulnerability. Measures will need to be in place to ensure effective communication with visitors - an issue which is already addressed on many sites locally. The measures to take before, during and after a flood should be detailed within a Flood Response Plan for each development site.

Any development encroaching within any of the plotted Flood Zones may increase flood risk to adjacent areas. The effect on flood risk of several small encroachments is cumulative. If the requirements of the NPPF and NPPG are met in full, then additional development should not increase flood risk elsewhere.

11.2 The Broads Flood Risk Alleviation Project and Broadland Futures Initiative

The Broadland Flood Alleviation Project (BFAP) was a long-term project, led by the Environment Agency, to provide a range of flood defence improvements, maintenance and emergency response services within the tidal areas of the Rivers Yare, Bure, Waveney and their tributaries.

The main aim of project work was to strengthen existing flood defences and restore them to a height that existed in 1995 (a level defined by the Environment Agency) and make additional allowances for sea level rise and future settlement of the flood banks.

This aim has largely been achieved, through a phased programme of improvement works comprising:

¹¹ A river catchment is the area of land whose water drains into that river. A permeable catchment lies on porous rock, such as chalk or sandstone.

¹² Where groundwater accounts for much of the inflow and outflow of the watercourse.

- Strengthening the existing flood banks, restoring them to agreed levels where excessive settlement has occurred
- Replacing existing erosion protection that is in a poor condition using more environmentally acceptable methods wherever possible
- Providing new protection where erosion is currently threatening the integrity of the flood defences
- Carrying out works at undefended communities

The Broadland Futures Initiative (BFI)¹³ is a partnership for future flood risk management in the Broadland area. The main goal is to agree a framework for future flood risk management that better copes with our changing climate and rising sea level. Planning is needed now to secure support and make well-informed decisions.

The Initiative has been set up by organisations responsible for managing coastal and inland flood risk. The Environment Agency have the lead responsibility and will be working with Natural England, County Councils, Internal Drainage Boards, Broads Authority and National Farmers Union. The Broads Authority provides support to the Initiative Project Team and BFI governance arrangements.

The BFI also works in partnership with local communities and other stakeholders to identify the way forward. Through the BFI Elected Members Forum, local politicians make the core decisions to agree a framework for future flood risk management that better copes with our changing climate.

It is also worth noting the [Lowestoft Tidal Flood Barrier project](#) whose impacts will stretch into Oulton Broad and close to the BA boundary.

The NPPF, current and new Local Plan policies and current Flood Risk SPD will enable flooding and flood risk to be addressed.

12. Local Coastal Changes

The Broads Authority has a small stretch of coast in the Executive Area (Winterton/Horseley area). The Kelling to Lowestoft Ness Shoreline Management Plan unit 6.13 covers Eccles to Winterton Beach Road. Coastal erosion is a sensitive issue and the detail of the approach for this area is included in the Management Plan. As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line up to 2055. In relation to the present day, the Plan says: *‘Due to the considerable assets at risk and the uncertainty of how the coastline could evolve, the policy option from the present day is to continue to hold the line of the existing defence. This policy option is likely to involve maintenance of existing seawalls and reef structures, replacing groynes as necessary and*

¹³ Broadland Futures Initiative: <https://www.broads-authority.gov.uk/looking-after/climate-change/broadland-futures-initiative>

continuing to re-nourish beaches with dredged sand. This policy option will provide an appropriate standard of protection to all assets behind the present defence line, and, with the recharge, a beach will be maintained as well as a supply of sediment to downdrift areas.'

Some Norfolk and Suffolk coastal Local Planning Authorities have produced a joint [SPD](#) to guide and inform development on the coast and elaborate on Local Plan policies.

There is a policy relating to the coast which generally supports the Shoreline Management Plan's approach. A Coast SPD has been produced.

13. Minerals

See section 8 of this document for references and information about the Suffolk and Norfolk Minerals and Waste documents.

The NPPF states 'It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.'

The NPPF states 'Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.'

Whilst the Broads Authority is not a district council, it is not a mineral planning authority, therefore the below wording is relevant.

The NPPG states '*Whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in 3 ways:*

- 1. Having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps;*
- 2. In those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and*
- 3. When determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.'*

The following table identifies the safeguarded mineral extraction and mineral infrastructure sites where either the site itself or the consultation area for the site falls within the Broads Authority Executive Area.

Site Name	Operator	Type
Norton Subcourse Quarry	Breedon Trading Ltd	Mineral Extraction Site Consultation Area
Earsham Quarry	Earsham Gravels Ltd	Mineral Extraction Site and 250m Consultation Area
Trowse Railhead	Tarmac	Mineral Infrastructure Consultation Area

Many current allocations in the Local Plan are partially on safeguarded minerals (sand and gravel) resource and this is identified. This approach is intended to be continued.

14. Energy

The NPPG says that:

When drawing up a Local Plan, local planning authorities should first consider what the local potential is for renewable and low carbon energy generation. In considering that potential, the matters local planning authorities should think about include:

- the range of technologies that could be accommodated and the policies needed to encourage their development in the right places;*
- the costs of many renewable energy technologies are falling, potentially increasing their attractiveness and the number of proposals;*
- different technologies have different impacts and impacts can vary by place;*
- the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver.*

Paragraph: 003 Reference ID: 5-003-20140306

Revision date: 06 03 2014

See separate Renewable Energy Topic Paper.

15. Utilities

In relation to gas and electricity, no providers who were consulted raised any concerns with regards to the Objectively Assessed Housing Need for the Broads during the Issues and Options Consultation, December 2022.

15.1 Gas

National Gas Transmission owns and operates the national transmission system throughout Great Britain which connects to eight regional networks. In the borough, National Grid also own and operate the local gas distribution network and are therefore also responsible for distributing gas to the borough. National Grid has a duty to develop and maintain an efficient, co-ordinated

and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances. Bacton Gas terminal is a large gas terminal located on the north Norfolk coast with an underground pipeline connecting the terminal with the gas power station in South Denes in Great Yarmouth. There are likely to be no future supply issues with gas provision. Improvements to the gas distribution network are generally carried out as a result of significant growth in overall regional demand rather than site specific requirements.

15.2 Electricity

The electricity distributor for the area is UK Power Networks, which is known as a Distribution Network Operator (DNO), covering 29,000sq km of London, the south east and the east of England. Their role is to take electricity at high voltages from the National Grid and transform it down to voltages suitable for commercial and domestic use. UK Power Networks are responsible for ensuring that the infrastructure that brings power to homes, businesses, hospitals, schools and other public services continues to deliver reliable, safe and sustainable electricity at all times.

15.3 Relevant district documents

Some of our constituent districts have produced energy studies and these may be relevant to the Broads. The ones in place (or being produced) at the time of writing are included below.

[North Norfolk Power Study \(2019\)](#) – the aim of this study is to review current energy infrastructure and identify areas where there may be constraints on energy supplies now and in the future. The areas of planned development are shown in relation to the local substation, which is also colour coded in a traffic light system according to the available capacity. The substations in green have no capacity issues, while those in red have under 5 MW of spare

capacity and will struggle to serve major additional development without further reinforcement.

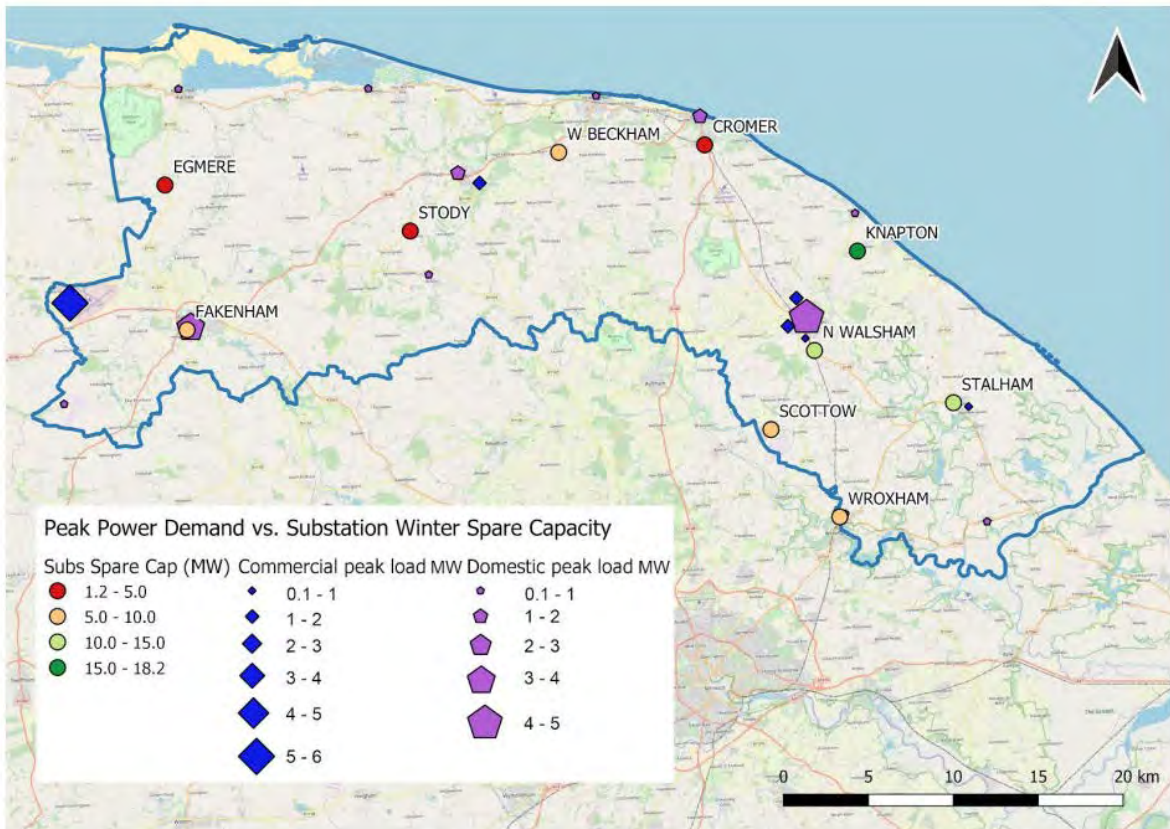


Figure 1: Development site demand mapped against winter spare capacity

[Greater Norwich Energy Infrastructure Study](#) (2019) - provide evidence in order for the emerging GN Local Plan to support development and the spatial distribution of growth. By reviewing existing energy demand for electricity, gas and heat we created and mapped a baseline across the region, identifying areas of the highest demand. Plans for development, both commercial and domestic, were also reviewed and the likely additional peak power demand was forecast, based on benchmarks and coming changes to government policy. The final important element is the capacity at each electricity substation across the region. These are the crucial parts of the infrastructure, which can dictate if development is possible or not. This shows the current load on these substations and does not account for 'reserved' capacity where part of the available headroom on the substation has already been committed to a future customer. The substations in green have no capacity issues, however there is only one on the map. Those in dark orange and red already have little spare capacity and will struggle to serve any additional development without any mitigation measures.

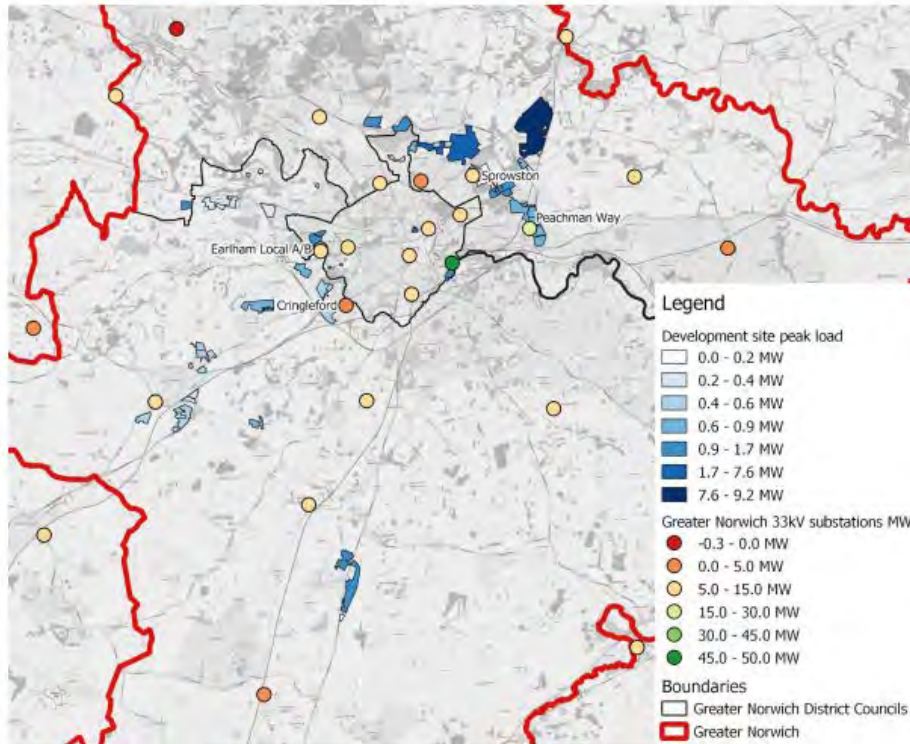


Figure 1: Planned development sites and existing substation spare capacity within Greater Norwich

The [Great Yarmouth Infrastructure Plan](#) 2020 says ‘As part of the preparation of the Local Plan Core Strategy, UK Power Networks confirmed that there was sufficient headroom in the electricity distribution networks to accommodate the overall housing growth needs. No further site-specific requirements were identified in relation to the allocated sites in the Local Plan Part 2’.

No specific issues relating to gas and electricity are identified.

16. Health and social care

The NPPF says at para 20: ‘Strategic policies should set out an overall strategy for the pattern, scale and

design quality of places, and make sufficient provision¹³ (inter alia) community facilities (such as health, education and cultural infrastructure)’.

The NPPG says: ‘Plan-making bodies will need to discuss their emerging strategy for development at an early stage with NHS England, local Clinical Commissioning Groups, Health and Wellbeing Boards, Sustainability and Transformation Partnerships/Integrated Care Systems (depending on local context), and the implications of development on health and care infrastructure’.

Paragraph: 005 Reference ID:53-005-20190722

Revision date: 22 07 2019

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.

Should housing or population growth increase from the current levels, NHS England in conjunction with the relevant Integrated Care Systems (ICSs) would need to review the growth or projected growth to ensure that suitable facilities are available to meet the needs of patients within the areas. Where significant growth occurs, this could result in the requirement of future expansion of existing premises or the procurement of new facilities. Discussions would take place with existing practices. A business case would need to be reviewed based upon the information and proposals at the time.

Where significant housing growth is planned the NHS would be looking to secure appropriate Section 106 contributions to assist in mitigating the cost of providing such additional health infrastructure.

The Norfolk HUDU model provides estimates, based on different housing growth scenarios, for the additional health care needs required in Norfolk and Waveney to take account of projected growth. The figures are high level and contribute to understanding the potential strategic needs for ICS areas and are not intended to set requirements for specific developments.

The [Planning in Health Protocol](#) 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.

The Broads Authority will work with other parties to fully understand the needs of the proposed housing numbers for Norfolk and Waveney.

At this stage, it is not proposed to have a specific policy on health facilities.

17. Education

The NPPF says at para 20: *'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision¹³ (inter alia) community facilities (such as health, education and cultural infrastructure).'*

Para 95: It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and

b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Discussions with Suffolk and Norfolk County Councils indicate that there is not likely to be a requirement for any schools to expand into the Broads Authority Executive Area in this plan period. Future development proposals will be assessed as they emerge and seek S106 developer contributions if justified and satisfy the CIL 122 Regulations.

East Suffolk Council said the following regarding education as part of the technical consultation: If the Broads was to consider absorbing any housing of major scale in the Oulton area, then current primary school space challenges in the area (The Limes Primary School is very close to capacity) could be a significant issue.

At this stage, it is not proposed to have a specific policy on education establishments.

18. Places of Worship, Local Services (shops, pubs, post offices, etc) and Community Facilities

The NPPF says '84. *Planning policies and decisions should enable (inter alia), d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship*'.

The Local Plan will have a general policy for determining changes to and new community, visitor and recreation facilities.

Pubs will continue to have their own specific policy in the Local Plan.

Open space, allotment, play and sport field need is assessed by the Broads' constituent districts. They assess the entire district, including that which is the Broads. The need is translated into standards for open space and a policy in the Local Plan will defer to these policies.

Regarding the shopping area in Oulton Broad, a policy like that in the Waveney Local Plan will continue to be in the Local Plan.

Regarding shopping areas at Potter Heigham Bridge, the area will continue to have its own policy.

The Hoveton Town Centre policy will continue to be part of the Local Plan.

There are some policies on specific local services and facilities. Other policies in the Local Plan will help determine applications for other uses and facilities.

19. Police

Norfolk and Suffolk Police were contacted, through the Architectural Liaison Officers to confirm if the dwellings and residential moorings which could be planned for in the Local Plan raised any policing concerns.

Norfolk Constabulary stated in November 2023 that an additional 17 dwellings a year or so would not cause any strain on the policy services.

There is no requirement for the Local Plan to address operational policing requirements.

20. Open Space and play, sport, recreation and Local Green Space

Currently, the Local Plan for the Broads seeks to protect open space and play identified on [policies maps](#) and seeks new provision in line with the standards of the districts. Further open spaces have been identified and will be protected in the Local Plan. Open space studies of our District Councils are as follows:

[Great Yarmouth Open Space Provision - Local Plan Topic Paper](#) (2020) – assesses the current open space and play provision and identifies open space requirements.

[North Norfolk Open Space Assessment](#) (2020) – assesses the current open space and play provision and identifies open space requirements.

[North Norfolk Amenity Green Space Study](#) (2019) - this is an appraisal of Open Space, Education & Formal Recreation Spaces, and Local Green Space options, in the Towns, Villages & Open Countryside in North Norfolk

[Waveney Open Space Needs Assessment](#) (2015) - The assessment includes an audit of parks and gardens, amenity green spaces, play spaces and allotments located within Waveney District (including those located in areas within Waveney District that are administered by the Broads Authority). Areas of biodiversity value have been identified and information relating to areas important to the biodiversity network has been collated and discussed. An overview of natural and semi-natural green space and cemeteries is provided and discussed in the context of the green infrastructure network and their contribution towards biodiversity. Green corridors that can support the movement of people and wildlife in the built-up areas of the District and habitats which provide key linkages in the green infrastructure network for people and wildlife are discussed. The River Wensum Strategy Delivery plan will be updated in early 2024.

[Waveney Playing Pitch and Outdoor Sports Facilities Assessment](#) (2014) - to identify the existing quantity and quality of pitches and outdoor sports facilities in Waveney district, identify areas with a deficiency or surplus of provision and to make recommendations for the provision, protection, and improvement for playing pitches and outdoor sports facilities across the district.

Norwich City Council is starting work on a park's regeneration strategy, and Greater Norwich are working on a new Green Infrastructure Strategy.

The East Suffolk Leisure Strategy was published in Nov 2021 and covers open space as well as sports and leisure: <https://www.eastsuffolk.gov.uk/assets/Leisure/East-Suffolk-Leisure-Strategy/East-Suffolk-Leisure-Strategy.pdf>.

The Waveney GI Strategy will be partially replaced by the (currently emerging) Healthy Environments SPD - general design guidance included in the GI strategy will be superseded by the SPD, but the recommendations re meeting open space needs in specific areas are considered to still be in date. Consultation on the [draft SPD](https://eastsoffolk.inconsult.uk/DraftHESPD2023/consultationHome) completed 10 January 2024--
<https://eastsoffolk.inconsult.uk/DraftHESPD2023/consultationHome>.

The East Suffolk Cycling and Walking Strategy was adopted in 2022 (<https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/>).

The Local Plan will continue the policy approach of protecting and enabling provision of open space in line with the standards set by the districts.

In terms of leisure and sport, there are two sports centres in the Broads and these will have their own policies: Broadland Sports Club and Ditchingham Maltings Sports Ground.

Continue with policies on these two important sports centres in the Broads.

In terms of Local Green Space, the current sites were [assessed](#), alongside new sites put forward for consideration.

Some areas of Local Green Space will be allocated in the new Local Plan.

21. Green Infrastructure

The NPPF defines green infrastructure (GI) as 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'.

There are some policies already in the Local Plan that are particularly relevant to Green Infrastructure. For example, local green spaces and former railway tracks are protected and safeguarded, there are policies specifically on Green Infrastructure and recreational access around the Broads.

The following studies are of relevance. They are summarised and discussed below.

21.1 Integrated Access Strategy (2019)

One of the purposes of the Broads Authority is to promote the enjoyment of the Broads. Footpaths and bridleways are important assets in the Broads. The main document that seeks to meet this purpose is the [Integrated Access Strategy](#). This seeks to meet the following key objectives:

- (1) To improve links between land and water and to the water's edge
- (2) To improve access links to local facilities, settlements, and visitor destination points
- (3) To improve access for all in the Broads

(4) To encourage sustainable travel choices such as public transport, walking, cycling and non-powered boating, and improve links between public transport provision, visitor destination points and access routes

(5) To deliver the River Wensum Strategy through the River Wensum Strategy Partnership

(6) To encourage provision of access routes that relieve visitor pressure on internationally designated sites, avoid disturbance of protected species and help to accommodate growth

(7) To provide appropriate information on access to recreational opportunities and interpretation about recreational sites.

The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in this strategy.

21.2 River Wensum Strategy

The vision of this strategy is to ‘To breathe new life into the river by enhancing it for the benefit of all and increasing access to, and greater use of, this important asset. An enhanced river corridor, with its unique natural and historic environment, will once again play an important part in the growth and vitality of the city, strengthening the visitor economy and helping to give the city a competitive advantage in attracting inward investment’. The [River Wensum Strategy delivery plan](#) sets out the projects that have either been delivered or are planned.

The Local Plan will continue the policy approach of enabling delivery of the River Wensum Strategy.

21.3 Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (RAMS) and Norfolk RAMS

Whilst access to the countryside and coast are important for people in terms of physical and mental health and wellbeing, if it is not managed, there could be likely significant effects on the protected sites in the area. Recreational impact has been identified as an issue that needs addressing at all the protected sites in Norfolk and the coastal protected sites in Suffolk. That is why the Broads Authority, like other relevant local planning authorities, is collecting tariffs from holiday homes and residential dwellings (as well as other types of relevant development) to pool with money from the other authorities, to mitigate likely significant effects on protected sites. This money will then be spent on both capital and revenue projects at the protected sites to help protect them.

More information can be found here: [Habitat mitigation \(broads-authority.gov.uk\)](https://broads-authority.gov.uk)

The Local Plan will need to ensure the collection of the tariff and delivery of mitigation.

21.4 Relevant district documents

Some of our constituent districts have produced Green Infrastructure Studies and these may be relevant to the Broads. The ones in place (or being produced) at the time of writing are included below.

[Greater Norwich Local Plan Green Infrastructure Study Report \(2020\)](#) - Discusses potential improvements in some areas near to or within the Broads.

[Waveney Green Infrastructure Strategy](#) (2015) – looks into play, green corridors and churchyards for example. Discusses potential improvements in some areas near to or within the Broads.

~~[East Suffolk Cycling and Walking Strategy \(draft\)](#)~~ [East Suffolk Cycling and Walking Strategy \(2022\)](#) – ~~currently in draft format~~. Some of the proposals are within the Broads and are generally supported.

The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in these documents, as relevant.

21.5 Biodiversity Net Gain

Whilst not an infrastructure item itself, the net gain requirement could produce more green infrastructure and habitats.

The Local Plan will ensure the requirements of Biodiversity Net Gain are met.

22. Blue Infrastructure

Water is a key aspect of the Broads and one of the purposes of the Broads Authority is to protect the interest of navigation. The Local Plan for the Broads includes various policies to protect and support appropriate enhancements to access to and enjoyment of the water (blue infrastructure). Particularly important is moorings, slip ways, waterside facilities and water quality (as discussed earlier in this document). Particularly important is the Integrated Access Strategy (see previous) as that highlights the importance of improved links between land and water and to the water's edge.

The Local Plan will continue the policy approach of protecting navigation and enabling appropriate improvements.

23. Developer contributions

NPPF para 34 says: *'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan'*.

It should be noted that the Levelling up and Regeneration Act 2023 seeks the introduction of an Infrastructure Levy to replace Section 106 and Community Infrastructure Levy. It is understood that trials will be ongoing and it could be a number of years before this Levy comes into place. The Authority will keep informed of progress.

For affordable housing need, we have regard to/defer to the affordable housing policies of the relevant district council. As stated in earlier sections, there is no specific requirements relating to education and health. Policies will be in place to address green and digital infrastructure. In terms of transport, we will work with the Highways Authorities to understand any local impact each allocation needs to address. There are policies in the local plan relating to flood and water management and these will set out requirements for developers. There will be a whole plan viability assessment completed as well.

24. Summary

- 1) At the time of writing, the district councils have not asked the Broads Authority to include specific infrastructure in the emerging Local Plan. We will continue to work closely with the District Councils.
- 2) As the Local Plan is produced, we will ensure it addresses the agreements set out in the NSPF.
- 3) The main large-scale infrastructure identified that is particularly relevant to the Broads, is the dualling of the Acle Straight. The current local plan has a policy on the Acle Straight and this will be rolled forward.
- 4) Development in the Broads may require local specific infrastructure. The Utilities Site will require significant infrastructure and that site is part of a wider regeneration area subject to a Masterplan and emerging SPD.
- 5) It is not proposed to set a standard for electric vehicle charging points in the new Local Plan for the Broads although there will be a policy relating to fire risk and the design and location of charging points.
- 6) The scale of growth proposed will not have strategic transport impacts. There may be some more local highway changes or improvements that could be needed because of schemes. We will contact the relevant Highways Authority regarding any allocations that are proposed. We will ensure we keep up to date with any relevant documents and strategies.
- 7) There is a policy that relates to telecommunications infrastructure emphasising the importance of addressing impacts on landscape in the Broads. The Local Plan will reflect the NSPF.
- 8) At this stage, the Authority is not aware of any specific security related issues that the Local Plan needs to address. Norfolk and Suffolk Architectural Liaison Officers are consulted at all stages of producing the Local Plan and their responses will be considered and addressed as appropriate.
- 9) The Local Plan will roll forward the current general support of the waste hierarchy as well as ensure any waste allocations in the Local Plans are considered. There is potential to improve reference to construction waste.
- 10) The Authority will continue with the 110l/h/d water usage requirement for new development. We will explore the potential to go lower than 110l/h/d.

- 11) The Authority will address water quality in the Local Plan. The Authority will keep updated regarding Horning Knackers Wood Water Recycling Centre. The Local Plan will reflect Nutrient Neutrality.
- 12) The NPPF, current and new Local Plan policies and current Flood Risk SPD will enable flooding and flood risk to be addressed.
- 13) There is a policy relating to the coast which generally supports the Shoreline Management Plan's approach. A Coast SPD has been produced.
- 14) Many current allocations in the Local Plan are partially on safeguarded minerals (sand and gravel) resource and this is identified. This approach is intended to be continued.
- 15) See separate Renewable Energy Topic Paper.
- 16) No specific issues relating to gas and electricity are identified.
- 17) At this stage, it is not proposed to have a specific policy on health facilities.
- 18) At this stage, it is not proposed to have a specific policy on education establishments.
- 19) There are some policies on specific local services and facilities. Other policies in the Local Plan will help determine applications for other uses and facilities.
- 20) There is no requirement for the Local Plan to address operational policing requirements.
- 21) The Local Plan will continue the policy approach of protecting and enabling provision of open space in line with the standards set by the districts.
- 22) Some areas of Local Green Space will be allocated in the new Local Plan.
- 23) The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in this strategy.
- 24) The Local Plan will continue the policy approach of enabling delivery of the River Wensum Strategy.
- 25) The Local Plan will need to ensure the collection of the tariff and delivery of mitigation.
- 26) The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in these documents, as relevant.
- 27) The Local Plan will ensure the requirements of Biodiversity Net Gain are met.
- 28) The Local Plan will continue the policy approach of protecting navigation and enabling appropriate improvements.
- 29) For affordable housing need, we have regard to/defer to the affordable housing policies of the relevant district council. As stated in earlier sections, there is no specific requirements relating to education and health. Policies will be in place to address green and digital infrastructure. In terms of transport, we will work with the Highways Authorities to understand any local impact each allocation needs to address. There are policies in the local plan relating to flood and water management and these will set out requirements for developers. There will be a whole plan viability assessment completed as well.

Appendix 1: responses received as part of technical consultation

Organisation	Comment	Response
Norwich City Council	Line 29: Should this also refer to the Infrastructure Investment Fund, 5-year Infrastructure Investment Plan and Greater Norwich Infrastructure Plan documents?	Noted and text added to reflect this.
Norwich City Council	Sections 20 and 21 – Norwich City Council is starting work on a parks regeneration strategy, and Greater Norwich are working on a new Green Infrastructure Strategy. Might be helpful for these sections to make reference to these as emerging documents.	Noted and text added to reflect this.
Norwich City Council	Section 20 – Just bringing to your attention that the River Wensum Strategy Delivery plan will be updated in early 2024 so the link to this document may need updating once this has been done	Noted and text added to reflect this.
Norfolk Police and Suffolk Police	Only additional comments we have would have are to include SBD Security principles into some industry aspects such as boat yards, leisure/amenity spaces and caravan/lodge sites (if any).	Noted. We have included such reference in some draft policies of the Local Plan. No further action for this document.
Norfolk Police and Suffolk Police	Just to make you aware that the police may also have ‘operations’ in place for flooding management, so perhaps a nod to Partnership working.	
Norfolk Police and Suffolk Police	We have already commented regarding SBD principles within the Design guide for housing so that’s covered I think.	Noted. We have included such reference in some draft policies of the Local Plan. No further action for this document.

Organisation	Comment	Response
Norfolk Police and Suffolk Police	With regarding to strains on policing any significant developments (over 100 houses) we would forward to our estates for CIL applications to help support with infrastructure to help support policing bigger areas, however if you are looking at 17 houses per year then I don't think that too much of a worry.	Noted.
Norfolk County Council – LLFA	Various comments and suggested track changes.	Most comments and track changes resulted in changes.
Norfolk County Council – Public Health	<p>Reference to the County Councils 'Walking, Wheeling and Cycling Strategy for Norfolk' should be included in the transport section (currently available as a draft for consultation).</p> <p>CCGs have been replaced by ICSs which needs to be updated.</p> <p>Section 106 and CIL section (line 956 – 958) needs an update. Health infrastructure is not eligible for CIL as outlined in the Greater Norwich Infrastructure Plan.</p>	Most comments and track changes resulted in changes.
Norfolk County Council – Minerals and Waste	Various comments and suggested changed.	Most comments and track changes resulted in changes.
Norfolk County Council – Education	Section is correct.	Noted.

Organisation	Comment	Response
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	NGET does not distribute electricity to individual sites and premises directly. It is the role of local distribution companies to distribute electricity to homes and businesses.	Noted.
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	Specific development proposals within your local planning authority area are unlikely to have a significant direct effect upon NGET's electricity transmission system. Generally, improvements to the system to provide supplies to the local distribution network are as a result of overall regional demand growth rather than site specific developments.	Noted.
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.	Noted and changed.
Anglian Water Services	10.2 Might be worth mentioning here the government's Environmental Improvement Plan which sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress.	Noted and changed.
Anglian Water Services	10.3 We welcome this statement and hope the emerging Joint Protocol and supporting evidence base will assist with this.	Noted.

Organisation	Comment	Response
Anglian Water Services	10.1 Agree - revised draft is available on our website and a summary of WRMP has been sent via email to all LPAs. https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/	Noted.
East Suffolk Council	<u>Ch 2.</u> Reference here should be made to the annual Infrastructure Funding Statements that district councils prepare, as they update infrastructure items and/or costs (including whether some such costs are S106 or CIL funded). See https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/ for ESC's 22/23 IFS.	Reference to IFS added.
East Suffolk Council	<u>Ch 10.</u> Not in East Suffolk, but the strategic significance of Whitlingham WWTW appears to be under-played in the document, given its large size, huge catchment area, impact on nutrient neutrality etc.	Noted, but the section refers adequately to all Water Recycling Centres. No change.
East Suffolk Council	<u>Ch 11.</u> It doesn't directly affect the Broads, but the Lowestoft Tidal Flood Barrier project is probably worth a mention as the impacts will stretch into Oulton Broad and close to the BA boundary.	Reference added.
East Suffolk Council	<u>Ch 16.</u> Given Greater Norwich's general resistance to spending CIL on healthcare infrastructure, this might need to be considered further. As the Broads isn't a CIL charging authority, it should probably be clearer that any healthcare infrastructure contributions would need to be generated via S106.	Section amended following comments from Norfolk County Council.
East Suffolk Council	<u>Ch 17.</u> If the Broads was to consider absorbing any housing of major scale in the Oulton area, then current primary school space challenges in the area (The Limes PS is very close to capacity) could be a significant issue.	Reference added to this issue.

Organisation	Comment	Response
East Suffolk Council	<p><u>Ch 18.</u> The recent use classes change introducing Class E means that any Oulton Broad shopping area policy would obviously need to reflect this.</p>	Noted and this has been done.
East Suffolk Council	<p><u>Ch 20.</u> Sports and recreation doesn't appear to be mentioned as a standalone topic (recreation gets a few passing mentions) but it probably should, given the Broads' key status as a recreation destination and because some sports facilities may be close to – or even in – the BA area. The East Suffolk Leisure Strategy was published in Nov 2021 and covers open space as well as sports and leisure: https://www.eastsuffolk.gov.uk/assets/Leisure/East-Suffolk-Leisure-Strategy/East-Suffolk-Leisure-Strategy.pdf.</p> <p>The Waveney GI Strategy will be partially replaced by the (currently emerging) Healthy Environments SPD - general design guidance included in the GI strategy will be superseded by the SPD, but the recommendations re meeting open space needs in specific areas are considered to still be in date. Consultation on the draft SPD runs until 10th January 2024 - https://eastsuffolk.inconsult.uk/DraftHESPD2023/consultationHome.</p> <p>The East Suffolk Cycling and Walking Strategy was adopted in 2022 (https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/).</p>	Agreed and reference made.

Broads Employment and Economy Topic Paper February 2024

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1. Introduction

The economy is an important element of plan-making. The NPPF identifies an economic objective: *'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'*.

As the new Local Plan for the Broads is produced, this report seeks to bring together information and findings to inform the economy section of the Local Plan. Generally, this is an update of a previous version of this Topic Paper. Documents were checked online to see if they were still valid, or, if not, updated versions were assessed. Furthermore, general thoughts of stakeholders and the public have been ascertained through the Issues and Options consultation and these too will be considered as the Economy section of the Local Plan is produced.

Norfolk County Council is developing a Norfolk Economic Strategy over the next 6 months (from December 2023).

Our six district councils and two county councils were asked for their thoughts on this document in a three-week technical consultation. Responses are included at Appendix E.

2. Key findings

The content of this Employment and Economy Topic paper is contained primarily in the various Appendices. This part of the report identifies the key areas, lists the Appendices, and summarises what is in each one and brings out findings relevant to the Broads.

2.1 NPPG and NPPF requirements relating to the economy - Appendix A

The National Planning Policy Practice Guide (NPPG) and National Planning Policy Framework (NPPF) set out requirements for Local Plans in relation to the economy, business, and employment. Relevant parts of these documents are included at Appendix A. The following shows how the Broads Local Plan responds to these requirements:

- The Broads Authority has produced a Housing and Economic Land Availability Assessment (HELAA) (as required by the NPPG <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>)
- With regards to 'ensuring the vitality of town centres', the Authority has produced a joint policy approach for Oulton Broad district Shopping Centre with East Suffolk
- Council and a joint policy approach for Hoveton Town Centre with North Norfolk District Council.
- The Local Plan has a housing target.

- There is no employment target for the Broads as the evidence in the district wide studies does not require this – they do not state that the Broads is required to include or meet an employment target in the Local Plan.
- The Local Plan does not identify strategic sites for employment as the work undertaken for the entire districts does not require the Broads Local Plan to find such sites – they do not state that the Broads is required to include or meet an employment target in the Local Plan.
- The Economy, Tourism and Retail section sets out the strategy.
- The Broads Authority does not undertake Economy Development functions; the constituent Councils undertake this function.
- Retail studies have been undertaken by district councils and incorporated into the Broads Local Plan in relation to Oulton Broad District Shopping Centre and Hoveton Town Centre.
- Quantitative employment work has been undertaken by district councils and none of these studies identify a jobs target for the Broads.

2.2 Literature Review - Appendix B

Amongst the literature reviewed are the Economy studies produced by the Authority's six constituent Councils. These studies provide the basis for forming an economic strategy. Each district is different and therefore the needs are different. The work undertaken by our six constituent councils does not require employment land to be allocated within the Broads to meet the Council's target. The various studies show the following:

- South Norfolk, North Norfolk and Great Yarmouth economies are 'stuck' and Norwich's is 'stifled'¹.
- The Tourism sector is important to the Broads. The Broads has a zone of influence in relation to tourism. The Tourism Strategy identifies priorities for the next five years as well as states the land and water-based tourism uses in the Broads and suggest markets to target.
- Other documents are of general relevance to the Broads and need to be considered. Indeed, those documents need to ensure they consider the Broads when they are prepared and delivered.

2.3 Economic Baseline - Appendix C

There are a variety of sources for data on the local economy and analysis has given a broad picture.

- According to the Census 2021:

¹ The places that are growing quickly but whose growth is restricted by their boundaries are the stifled. The places that are still dealing with the fallout of the industrial trauma of the 1980s are the stuck.

- Top Industries in which people work are: Wholesale and retail trade; repair of motor vehicles and motor cycles and Human health and social work activities and Construction
- Qualifications: Level 4 and above – 39%
- Top occupations of those living in the Broads: Managers, directors and senior officials, professional occupations, Skilled trade occupations and Associate professional and technical occupations
- Tourism: Visitor numbers 7.185 Million, Direct spend £455.67 Million, Economic impact £617.92Million, Direct employment: 4,999 FTEs (STEAM report).
- Out of work benefits are down from COVID19 levels (NOMIS).

2.4 Comments received as part of the Issues and Options consultation - Appendix D

Generally, clarity in the Farm Diversification policy is supported. No concerns raised relating to the employment policies of the Local Plan at this stage.

3. How the Local Plan addresses Employment and the Economy

The following policies that relate to the economy and employment will be in the Local Plan.

Employment section

Policy SP10: A prosperous local economy

Policy SP11: Waterside sites

Policy DM25: New employment development

Policy DM26: Protecting general employment

Policy DM28: Development on waterside sites in employment or commercial use, including boatyards

Policy DM38: Permanent and temporary dwellings for rural enterprise workers

Policy TSA3: Griffin Lane – boatyards and industrial area

Policy TSA4: Bungalow Lane – mooring plots and boatyards

Policy HOR6: Horning - Boatyards, etc. at Ferry Road. and Ferry View Road

Policy CAN1: Cantley Sugar Factory

Policy HOR8: Land on the Corner of Ferry Road, Horning

Policy POT1: Bridge Area

Tourism section

Policy SP12: Sustainable tourism

Policy DM29: Sustainable tourism and recreation development

Policy DM30: Holiday accommodation – new provision and retention

Policy HOV4: BeWILDerwood Adventure Park

Retail policies

Policy DM51: Retail development in the Broads

Policy HOV5: Hoveton Town Centre and areas adjacent to the Town Centre

Policy OUL3 - Oulton Broad District Shopping Centre

Sectors

Policy SSPUBS: Pubs network

Policy DM44: Visitor and community facilities and services

Appendix A: NPPG and NPPF requirements relating to the economy.

Generally, the NPPG refers to the following. As these sections are quite long, they have not been copied over, but the link added.

- Housing and Economic Land Availability Assessment (HELAA) <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>
- 'Ensuring the vitality of town centres' <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>
- Housing and economic development needs assessments <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

The following are the relevant references in the NPPF

[National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/guidance/national-planning-policy-framework)

8: an economic objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings.

81. Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

82. Planning policies should: a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

83. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative, or high technology industries, and for storage and distribution operations at a variety of scales and in suitably accessible locations.

84. Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; b) the development and diversification of agricultural and other land-based rural businesses; c) sustainable rural tourism and leisure developments which respect the character of the countryside; and d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

85. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist

Appendix B Literature Review

The following documents have been produced by various organisations, but all have relevance to some extent to the Broads. This section summarises the documents briefly, highlighting anything in particular that relates to the Broads.

B1 Sustainable Tourism in the Broads 2016 – 2020²

The purpose of the strategy and action plan is to guide how tourism is developed, managed, and promoted in the period from 2016 to 2020. It is a document for everyone engaged with and affected by tourism in the Broads. It provides the basis for agreeing annual priorities and actions and for checking progress. This strategy and action plan builds on two previous versions, covering 2006-10 and 2011-15.

The water-based product

- Cabin hire motor cruisers
- Private motor cruisers
- Day hire motor boats
- Sailing craft licensed for hire
- Other non-powered craft, include rowing boats, canoes, punts and other small craft.
- Boat trips
- Water-based activities provide an increasingly important component of the Broads offer. Sailing, rowing, canoeing and stand up paddle boarding are part of this.

The land-based product

- Serviced accommodation (hotels, inns, guest houses, B&B)
- Self-catering accommodation
- touring caravan and camping parks
- Pubs, restaurants, and cafés play a very important role in the Broad's offer, often in waterside locations.
- Visitor attractions add considerably to the diversity of the Broads experience.
- Nature reserves and wildlife sites can be found throughout the Broads
- Retail, arts, and craft centres
- Walking

² http://www.broads-authority.gov.uk/_data/assets/pdf_file/0012/769773/Sustainable-Tourism-in-the-Broads-2016-20-May-2016.pdf Sustainable Tourism in the Broads May 2016 (pdf | broads-authority.gov.uk)

- Cycling is well suited to the flat landscapes.

Volume and value of tourism

It is estimated that in 2013 there were approximately 6.5 million visitors to the Broads National Park, the vast majority of which were day visitors. In addition, some 0.6 m visitors were staying outside the National Park but in its 'area of influence' and a further 0.2 m were staying on private boats and 0.14 m on hire boats in the Broads. This amounted to a total of around 7.5 million visitors. Visitor numbers showed a very slight increase between 2009 and 2013 but the overall picture was essentially static.

Looking only at the spending by visitors staying overnight, the above estimates suggest that within the designated area of the Broads National Park the economic impact of visitors staying in land-based accommodation, on hire boats and on private boats⁴ is very roughly equivalent and totals around £163m. However, this figure is more than doubled if the spending by visitors staying in the wider area influenced by the Broads is considered. Although there are seven times more private boats than hire boats, the spending generated by them is equal as hire boats are used for many more days in the year. Spending by day visitors in the designated area of the Broads National Park is estimated at over £212m. This accounts for around 57% of total visitor spending in the National Park. Day visitor spending in the wider area of influence is not included, as it is assumed in the model that day visits, as distinct from staying visitors to this area will not have been influenced by the Broads. Between 2009 and 2013 there was a small decline in the economic impact of visitor spending, at constant prices, albeit with year-on-year fluctuations. Although the data is not strictly comparable, the trend in performance of the Broads in terms of visitor numbers and spending appears to have been broadly in line with the trend for England outside London.

Performance of tourism businesses

A survey of tourism businesses in the Broads, conducted for the purposes of this strategy in 2015, enquired about their recent performance. This revealed a broadly positive or static picture, with 48% reporting growth in the past three years and 41% no change. Only 7% reported a decline. Despite this positive situation, when asked about the need to achieve a higher turnover and more income, almost half (48%) the businesses indicated that this was essential to achieve viability, with a further 20% saying that this was necessary to obtain a reasonable profit. One quarter were seeking more business even in July and August, with 50% seeking more business in April, May, June, and October. The largest proportion of respondents pointed to a particular need in February, March, and November

Issues, challenges and opportunities identified

Based on the above evidence and from the consultation undertaken with a range of interests in the Broads, a number of key issues, challenges and opportunities for tourism have emerged that need to be addressed in the strategy.

- Internationally protected wildlife sites

- The seasonality of visits
- Web and digital presence
- National Park status
- Conservation of the natural and cultural heritage
- Wildlife as a tourism asset
- Environmental impact, climate change and greening the tourism offer
- Facilities for water-based visitors
- Broads experiences for land-based visitors
- The quality of visitor services, notably the food offer
- The availability of information at point of need
- Broadband and mobile phone coverage
- Transport access
- Attracting new and younger markets
- The environment for business investment
- Coordination within and beyond the Broads
- Lack of funding

SWOT Analysis

<p><u>Strengths</u></p> <ul style="list-style-type: none"> • A fantastic waterspace and wetland landscape of international importance • Extensive uninterrupted inland waterways with long established boating product, including motor cruisers and yachts for hire and river trips • Distinctive cultural heritage themes and sites associated with the landscape • Exceptional and accessible birdlife and other wildlife • Close links to varied and complementary experiences in Norwich and the coast • Range of water-based activities, especially angling and canoeing • Some individual good quality accommodation and catering operations • Some unusual and popular visitor attractions • Good rail access 	<p><u>Weaknesses</u></p> <ul style="list-style-type: none"> • Imbalance between north and south Broads in both supply and demand • Inconsistency in quality of accommodation and catering • Lack of coordination between tourism related bodies • Poor broadband and mobile coverage • Insufficient moorings and provision of waterside facilities • Undeveloped walking and cycling offer • Lack of funding for initiatives • Insufficient human resources to undertake necessary delivery • Seasonality of demand and of the offer
<p><u>Opportunities</u></p> <ul style="list-style-type: none"> • Ability to use National Park brand • Recent improved access to London/South East • Forecast growth in domestic and inbound markets • Growing market interest in experiences, activities and wellbeing • Growing market interest in wildlife and natural heritage • Water, Mills and Marshes HLF project • EU funding for rural development • Private sector interest in sponsorship 	<p><u>Threats</u></p> <ul style="list-style-type: none"> • Reduction in public sector funding • Over-reliance on older markets • Concentration of visitor numbers/pressure on certain areas • Labour, skills and volunteer shortage • Climate change • Damage to natural and cultural assets (including from tourism) • Lack of business support for destination bodies • Inability to coordinate between key bodies • Competition from other destinations

Primary target markets

- Domestic short breaks and holidays - Couples post-family A flexible market.
- Domestic short breaks and holidays – Families
- Day visitors A relatively stable market, important for generating year-round business in local enterprises
- Overseas visitors Forecast to grow faster than domestic markets.
- Young independent travellers A flexible market.
- Groups Organised day trips and short breaks.
- People with disabilities
- Special interest Birdwatchers.

Key principles

- Pursuing sustainable growth
- Achieving more year-round visitor spending
- Focussing on conservation and environmental management
- Promoting and living up to the National Park status
- Spreading benefits to all parts of the Broads
- Providing a National Park for all
- Working in partnership

B2 Broads Plan 2022³

The Broads Plan is the single most important strategy for the Broads National Park, setting out a long-term vision and strategic objectives to benefit its landscape, environment, local communities and visitors. As a high-level overarching plan, it draws together and guides a wide range of plans, programmes, and policies relevant to the area. The Broads Plan is reviewed and updated on a regular basis, and this Plan covers the period 2022 to 2027.

Theme A Responding to climate change and flood risk

- A1 Prepare a long-term integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal frontage and maintain current adaptive coastal, tidal and fluvial flood risk management approaches for the area
- A2 Work towards making all Broads Authority operations carbon neutral by 2030 and carbon zero by 2040
- A3 Agree carbon reduction targets for the Broads National Park and promote action to reduce emissions

Theme B Improving landscapes for biodiversity and agriculture

- B1 Restore, maintain and enhance lakes and use monitoring evidence to trial and implement further innovative lake restoration techniques
- B2 Promote best practice water capture and usage across the Broadland Rivers Catchment and reduce point and diffuse pollution into the floodplain and water courses
- B3 Seek biodiversity net gain and enhance areas of fen, reed bed, grazing marsh and wet woodland, to protect peatlands as carbon sinks
- B4 Define, implement and monitor management regimes for priority species and invasive non-native species
- B5 Improve partnership coordination and communication of Broads biodiversity monitoring and research effort, linked to the National Biodiversity Network

³ [Broads Plan 2022 - 2027 \(broads-authority.gov.uk\)](https://broads-authority.gov.uk)

Theme C Maintaining and enhancing the navigation

- C1 Maintain navigation water depths to defined specifications, reduce sediment input and dispose of dredged material in sustainable and beneficial ways
- C2 Maintain existing navigation water space and develop appropriate opportunities to extend access for various types of craft
- C3 Manage water plants and riverside trees and scrub, and seek resources to increase operational targets
- C4 Maintain and improve safety and security standards and user behaviour on the waterways

Theme D Protecting landscape character and the historic environment

- D1 Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including 'at risk' assets
- D2 Maintain an up-to-date Broads Landscape Character Assessment
- D3 Maintain up-to-date Conservation Area designations, appraisals and management proposals
- D4 Reduce the impacts on the Broads of visual intrusion and noise and light pollution, and promote Dark Sky Discovery Sites

B3 The Making of an Industrial Strategy – Localis 2017⁴

Localis are an independent, cross-party, leading not-for-profit think tank that was established in 2001. The work promotes neo-localist ideas through research, events, and commentary, covering a range of local and national domestic policy issues. This piece of research relates to the economy of the country.

The stifled and the stuck. The research also identifies two sets of places which require special intervention in the industrial strategy. Firstly, the places that are growing quickly but whose growth is restricted by their boundaries are the stifled. The research suggests these are the places that are successfully reorienting their economies based on demographic and economic trends. They are fast growing, with associated growing pains, but are often stymied by their administrative boundaries. They need the power to grow. Secondly, the places that are still dealing with the fallout of the industrial trauma of the 1980s are the stuck. The research suggests these are the thirty most structurally challenged local economies in England, which perform poorly on multiple indicators, both long term demographic trends and more immediate short term economic performance. They are penumbra economies that have not recovered from the 1980s. They have weak labour markets and much of the growth experienced in the past few decades has been in poorly paid and insecure sectors such as retail. Many have attracted a great deal of investment from central government and the European Union, but structural issues persist. Local council's political make-up is often multi-party coalitions or, at the other end of the

⁴ [The making of an industrial strategy \(localis.org.uk\)](https://localis.org.uk)

scale, 'one party states'. Greater top-down intervention is required, focused on building local capacity in leadership and skills.

Great Yarmouth, South Norfolk and North Norfolk are in the top 30 structurally weakest economies in England and classed as Stuck. Norwich is classed as stifled.

B4 Ipswich and Waveney Economic Areas Employment Land Needs Assessment 2016

Waveney District Council, along with Ipswich Borough Council, have produced the Ipswich and Waveney Economic Areas Employment Land Needs Assessment (March 2016)⁵. This runs to 2031. The report assesses the entire District, including that part which is the Broads. The study considers future quantitative land and floorspace requirements alongside related qualitative factors for individual sectors and employment uses.

The Waveney area is self-contained, particularly in terms of its workforce. Therefore, basing a functional area on the administrative boundary is justified through the focus on travel to work.

Lowestoft and Great Yarmouth collectively function as a leading centre for renewable energy, with much of the demand for commercial property driven by these energy and related sectors.

The Waveney Economic Area comprises the Waveney District administrative area, the most easterly District in Britain. Historically, Waveney's economy has been based on farming, printing, manufacturing, food processing and industries taking advantage of the coastal location, but in recent years has become increasingly recognised for its growing potential to support the offshore energy sector. Its proximity to planned and operational wind farms has generated economic benefits for the District's key town of Lowestoft and this trend is expected to continue in future.

Total employment stands at 47,109, having declined by 3% over the last four years. This suggests that Waveney's economy has particularly suffered from the effects of the recession, together with longer term structural challenges in the local economy. The key sectors in employment terms are public administration, health and education, finance and business services, retail, and manufacturing.

GVA per capita in Waveney is one of the lowest in the East of England and whilst the District's business base has been growing, this rate of growth also falls behind the regional and national average, with smaller sized businesses (0-9 employees) driving most of this growth. Waveney performs poorly across a range of labour market indicators including economic activity, unemployment, earnings, and skilled occupations.

In functional economic terms, Waveney is closely connected with neighbouring Great Yarmouth, with both towns playing an important role in servicing the renewable energy sector, and to a lesser extent the oil and gas industry. It has significantly weaker economic linkages with other

⁵ [Ipswich and Waveney Economic Areas - Employment Land Needs Assessment March 2016 \(eastsuffolk.gov.uk\)](https://www.eastsuffolk.gov.uk/employment-land-needs-assessment-march-2016)

Suffolk authorities, due in part to the relative distance between these locations and relatively poor condition of the highway network south from Lowestoft.

Waveney is characterised as having a buoyant industrial market, with the town of Lowestoft accommodating most of the industrial space and occupier requirements. Demand is particularly strong for modern, small, and medium sized industrial units with a typical size range of between 1,000sqft/100sqm and 25,000sqft/2,300sqm.

The recent designation of an Enterprise Zone has encouraged new commercial development (including speculative development) to come forward in the area over the past few years, including at Mobbs Way and Riverside in Lowestoft. However, employment land supply within the northern part of the town is nearly exhausted and in absence of new development land being identified, requirements are likely to be displaced to Great Yarmouth which benefits from greater availability of land.

Waveney is not an established office location and lacks the critical mass of office occupiers to compete for office-based activity and firms. What limited demand there is comes from local business churn in financial and business services, with some office occupiers connected to the energy sector.

Demand for rural employment space across the two Economic Areas is reported to be limited, with demand generally catered for by existing provision. These types of premises can play an important role in providing affordable workspace and retaining home based businesses within the local community, albeit local commercial property market agents do not expect to see any significant growth within this sector over the short to medium term. It will nevertheless be important that the various Councils continue to safeguard against any future downturns in traditional rural activities by encouraging the conversion and re-use of rural buildings for non-agricultural uses to grow and diversify the employment offer in the sub-region's rural economy.

Some of the key findings of the business survey include the following:

1. Key factors influencing choice in business premises within the sub-region include the cost and quality of premises, provisions of ICT and on-site car parking, while key factors influencing choice in business location within the sub-region include internet speeds, access to road networks, quality of the environment, local labour markets and access to local and regional markets.
2. Businesses were generally satisfied with the quality of their premises with an average score provided across the sub-region of 3.4 (out of 5, with a score of 5 representing an 'excellent' quality); with firms in the Ipswich Economic Area indicating a slightly higher perceived quality than those in the Waveney Economic Area.
3. Most surveyed businesses within the sub-region indicated that the space provided by their premises was 'about right' to meet their needs, although a quarter of all respondents indicated that they had 'not enough space' to meet their space requirements. This shortage of space was most prevalent in the Waveney Economic Area.

4. Around half the surveyed businesses indicated they have previously had difficulties in finding suitable premises to relocate within the sub-region, with the most cited difficulties including shortage of affordable and modern premises (for both office and industrial premises), high rents and rates and limited on-site car parking. The difficulty in finding suitable premises was reported to be greater in the Waveney Economic Area.
5. The surveyed businesses highlighted a strong ambition for growth, with almost three-quarters of respondents indicating they expected to expand their business operations in terms of land and premises during the next five to ten years. Most of these businesses anticipated a need for additional office accommodation.
6. To meet their growth requirements, nearly all respondents indicated they would most likely either relocate to another site in the same town or local area or expand on their existing employment site.
7. Generally, the surveyed businesses within the sub-region were satisfied with their local area as a business location, with an average score given of 3.5 (out of 5, with a score of 5 representing 'very satisfied'). A greater satisfaction was indicated by respondents in the Ipswich Economic Area compared to the Waveney Economic Area.
8. The respondents identified several strengths and weaknesses of their local areas as business locations, as well as key barriers to growth that primarily related to a shortage of suitable and affordable premises, poor internet infrastructure, attracting and retaining skilled workers, local traffic congestion, and the significant costs of relocation and expansion.

B5 Great Yarmouth Borough Council Employment Land Needs Review December 2022

[Employment Land Needs Review \(arcgis.com\)](https://arcgis.com)

This Employment Land Needs Review has been prepared to ensure that the Borough has sufficient employment land to meet needs over the new plan period, to 2041. It provides an assessment of the economic context of the Borough and provides an estimation of future needs for employment space based on a range of sources. It also includes a review of existing employment areas within the Borough and provides conclusions on whether they should continue to be protected for employment uses in planning policy.

The analysis shows that there is still a significant role for employment uses in the Borough's economy. Historically, take up has been just over 2 hectares of land for employment use per year (over the last 10-20 years), this is despite fluctuations in the number of actual employment use jobs and total recorded employment uses floorspace within the Borough.

The two employment forecast scenarios provide a range of -522 to 699 employment use jobs to 2041, with the latter, upper range, the more recently modelled forecast. Ambitions to further develop Great Yarmouth as a centre for offshore renewable energy has the potential to boost the number of jobs. There are, however, signs of slow down, with decreasing floorspace recorded for industrial uses, and wider economic factors such as the recent increase in inflation.

Office use is still projected to rise, but the full impact of hybrid working (such as working from home) may have yet to be fully realised. In addition, the national trend to increase warehousing space to serve online shopping also has the potential to boost employment uses.

There is no guarantee that the higher range of the jobs growth will be achieved. However, a precautionary approach would be to take the higher end of the jobs growth projection as it is more up-to-date and will ensure that such growth can be met with available land rather than leaving it to unplanned development.

The existing employment sites have been audited with a detailed assessment of the use and functionality of each employment site. Recommendations have been made to remove some sites entirely, with other site boundaries amended, and some new sites identified. There is a consequent reduction in employment land, overall floorspace and employment floorspace. There is the potential that some of the lost employment land results in some additional employment land needs elsewhere. It is, however, considered that the revised employment site boundaries will allow the sites to perform better having taken account of alternative uses of land and constraints to deliver employment uses.

It is important that the new Local Plan has sufficient land available to meet that identified jobs growth and likely take up of employment land. Based on the higher jobs growth projection, the forecasted employment land need would be 6 hectares to 2041 (this is compared to -6.82 hectares on the lower jobs forecast range). However, based on the continued employment land take up rate to 2041, the new Local Plan would require 38.42ha (based on 17 years plan period with adoption in 2024) of land. In addition to projections and trends, there is the potential for growth within the offshore energy sector to require employment jobs uplift and consequent employment land. Consequently, there is a justification for a higher level of need of employment land than just what has been projected through jobs growth. A precautionary approach would be to recommend an employment need of approximately 39 hectares of employment land.

The above recommended (revised) employment site areas include undeveloped land totalling 19.38 hectares. In addition, the potential allocation of an extension to Beacon Business Park (comprising 20.12 hectares) could help to support ambitions of growth within the offshore energy sector. In total, the undeveloped employment land on protected sites and the potential allocation would result in 39.5 hectares of additional land potentially available for employment use.

The potential for 39.5 hectares of undeveloped employment land would provide significant headroom to cater for projected employment land needs, but also would have the potential to meet a similar employment land take up to that witnessed over the last 10-20 years. It is important to note that such land has been identified without knowledge of private landowner intentions, therefore the deliverability of such land remains uncertain. Clearly, further investigation will be required as part of the Housing and Economic Land Availability Assessment (HELAA) to better inform the delivery of individual sites.

B6 Greater Norwich Councils' Employment Work

[The Greater Norwich Town Centres & Retail Study Update](#) (2020) was prepared during the COVID19 pandemic.

Key messages relating to retail are:

- The pressures facing certain parts of the retail sector, particular high street comparison goods retailers, have continued with several business failures and other retailers seeking to down-size their store portfolios and concentrate on larger centres. These trends have been intensified throughout 2020 due to the severe impacts of the COVID-19 pandemic, as businesses were forced to shut and attracted fewer customer visits into stores.
- In relation to the changes in per capita retail expenditure forecasts since the completion of the 2017 Study, a comparison between the latest data published by Experian and the 2017 work reveals no substantial change in convenience goods spending up to 2035. However, there is a significant downgrading of future growth in comparison goods in the period up to 2035 (+58% in the 2017 Study and +36% in the latest assessment).
- A key influencing factor for this change is spending via the internet. Spending via the internet, particularly in relation to comparison goods has been a growing trend for many years although the impact of the COVID-19 pandemic has led to a significant increase in the market share of this channel in 2020 (23.4% in 2019 and 30.6% in 2020). Whilst there is predicted to be a small 'bounce back' in 2021, it is unlikely that the share of spending via the internet will return to levels seen pre-2020.

quantitative expenditure/floorspace capacity key messages are:

- There has not been a significant change in the convenience goods floorspace forecasts across each of the three main geographic areas. It remains the case that there is no quantitative requirement to plan for net additional convenience goods floorspace, although, as outlined below, there may be very good qualitative reasons why a modest amount of convenience goods floorspace should be placed in new local centres to support the day to day needs of new communities.
- For the reasons outlined above, there has been a material change in the level of retail expenditure available to support 'bricks and mortar' comparison goods floorspace across the Greater Norwich area. The changes has, unsurprisingly, been focused upon the Norwich urban area. Our updated assessment considers the fall in available expenditure since 2017 and shows a small over-supply in comparison goods floorspace across the two rural areas, whilst the over-supply in the Norwich urban area is circa -20,000sq m net. These levels of 'negative capacity' confirm the current draft strategy for retailing in the new Local Plan which is not to allocate sites/locations for net additional comparison goods floorspace. Instead, the forecast over-supply would reinforce an approach which seeks to concentrate upon existing provision in terms of redevelopment, refurbishment/remodelling, and, in some instances, down-sizing and repurposing to other land uses appropriate to town centre environments.

B7 Norwich Town Deal

Norwich City Council⁶ was awarded £25m at the end of 2020 from the Ministry of Housing, Communities and Local Government to deliver eight key projects.

Developed in partnership with the Norwich Vision Group, local communities, partners, and public/private investors; these projects will provide a highly significant boost to deliver major regeneration alongside much needed skills infrastructure and jobs at a time when we are facing an unprecedented challenge to the future prosperity of the city, its residents and business community.

Eight core projects will support the delivery of jobs, homes, skills, and action to reduce our carbon emissions. Projects include activities which ensure all our residents directly benefit from the proposed investment.

B8 New Anglia LEP Economic Strategy⁷

The Norfolk & Suffolk Economic Strategy outlines ambitious plans for future growth across Norfolk and Suffolk.

Bringing together public and private sector partners with education and the VCSE sector, it sets out our ambition for Norfolk and Suffolk:

‘Our ambition is to transform our economy into a globally recognised, technology-driven and inclusive economy which is leading the transition to a zero-carbon economy through sustainable food production, clean energy generation and consumption and digital innovation; becoming one of the best places in the world to live, work, learn and succeed in business.’

We want Norfolk and Suffolk to be:

- A higher-performing, clean, productive, and inclusive economy.
- An inclusive economy with an appropriate and highly skilled workforce, where everyone benefits from clean economic growth.
- The place where high-growth businesses with aspirations choose to be.
- A well-connected place, locally, nationally, and internationally.
- An international-facing economy with high-value exports.
- A centre for the UK’s clean energy sector.
- A place with a clear, defined, ambitious offer to the world.

⁶ [Norwich Town Deal | Norwich City Council](#)

⁷ [Norfolk and Suffolk Economic Strategy - New Anglia](#)

We recognise this will not be achieved by one partner alone, or by any single strand of investment or action. We have always been most successful when we work together for the benefit of those who live, work, learn in and visit Norfolk and Suffolk. The actions in this strategy will help lead us out of these challenging circumstances and deliver on our region’s potential.

Local partners across business, business support organisations, local authorities, public health, education providers and VCSE have come together to agree this strategy and are all committed to:

- **Collaborating** – to secure and align investment and actions to build a cleaner, more inclusive, and productive economy.
- **Inspiring** – the next generation, current workforces, businesses, VCSE organisations and communities to innovate, and embrace automation and clean growth through strong collaborative leadership.
- **Innovating** – exploiting our expertise and innovation capabilities to pioneer solutions to the major challenges facing the world in the 21st century. Ensuring we capitalise locally on the application and diffusion of this innovation and the emerging growth opportunities.
- **Investing** – in people, sustainable infrastructure, innovation, social and environmental value, health and wellbeing, leveraging more investment to deliver on our ambitions.

OUR AMBITION 3

WHAT WE WANT NORFOLK AND SUFFOLK TO BE:

→ **A higher performing clean, productive and inclusive economy,** where business invest in people and innovation, new sustainable techniques and technology, leading to decarbonisation, increased value in our foundation sectors, reductions in wage inequalities and pressure in overall living standards and productivity improvements.



→ **A well-connected place, locally, nationally and internationally,** investment in sustainable infrastructure – affordable housing, roads, rail and digital – is coordinated to build the communities and connections that people and businesses need.

→ **An international facing economy with high value exports,** where our sectors are producing and exporting more Sustainable value-added goods and services, entering new global markets and capitalising on new trade links to other economies.



→ **The place where high growth businesses with aspirations choose to be,** with excellent sustainable sites to locate, grow and innovate, with easy access to support and finance which fit the need of businesses.



→ **An inclusive economy with an appropriate and highly skilled workforce, where everyone benefits from clean economic growth,** Norfolk and Suffolk will continue to promote collaboration between business, HE, FE, schools, VCSE organisations and the public sector to provide the training opportunities and work experience that enable businesses and people to fulfil their full potential.



→ **A place with a clear, defined, ambitious offer to the world,** which showcases the strengths of Norfolk and Suffolk as the UK’s clean growth region to the UK and beyond. Offering diverse, high quality, sustainable and affordable housing where people want to live, with a strong vibrant culture and leisure offers and a clear sense of why people and business choose to live and work here.

→ **A centre for the UK’s clean energy sector,** exploiting the strength and diversity of the energy sector and supply chain, our strategic location, skills base and connectivity to other regions. Where local communities and businesses are benefiting from these strengths.

OUR UNDERPINNING SECTORS

There is significant opportunity for cross sector collaboration and innovation. Tackling the labour, supply chain and productivity challenges in these sectors and maximising their growth opportunities are key parts of this strategy.

Construction and development



Large and diverse, with emerging specialisation in Passivhaus and sustainable design

Creative industries



Strong and diverse sector, with major concentrations around Norwich and Ipswich

Financial services, insurance & professional services



One of the largest general insurance and financial services clusters in Europe

Health and social care



Transformational partnership working to deliver first of its kind Integrated Care Academy and research impact through the Norwich Institute of Healthy Ageing

Advanced manufacturing and engineering



National expertise in automotive, civil aviation, space, composites, and pharmaceuticals

Life sciences and biotech



International expertise in the fields of food, health, and microbiome – advanced cluster of animal health and emerging pharmaceutical manufacture

Ports and logistics



UK's largest container port at Felixstowe and nationally significant ports for the energy and agri-food sectors, with a strong logistics cluster

Visitor economy



A varied and significant tourist offer, from coast and countryside

Voluntary, community and social enterprise



The voluntary, community and social enterprise sector has an important role to play in supporting those furthest from the labour market

OUR ECONOMY AT A GLANCE



£38bn
contribution to the UK plc



£244,354
Median house price (England in 2020: £255,900)



25% higher salary in 'Green Jobs' than the economy average



36% STEM take (UK 41%)



1,675,300 total population

All people 16-64 (working age pop): 978,000 (58.4%) vs. 62.3% for England.
65's & over: 406,800 (24.3%) vs. 18.5% for England



£28,452
median gross wage (England £31,777)



£5.2bn
goods exported in 2019



75.9% employment levels, that's higher than the 74.4% UK average



63,460 independent enterprises



Increasing our region's productivity levels to the UK average would contribute an additional £4bn gross value per annum to our economy!



28%* at level 4+
Only 28% of jobs require level 4+ (UK 32%)

*Our economy is skewed towards occupations requiring lower-level qualifications.



Workforce NVQ Qualification levels in Norfolk & Suffolk

35% Level 4 (UK 43%),
19% Level 3 (UK 17%),
18% Level 2 (UK 15%),
14% Level 1 (UK 10%),
7% None (UK 7%),
5% Other (UK 6%)

B9 New Anglia LEP Growth Deal⁸

Our ambition is to transform the local economy into a global centre for talent and innovation. To achieve this we have signed a multi-million pound Growth Deal with Government which will boost the region's skills, drive innovation, target support to help small businesses to grow and improve transport and infrastructure.

New Anglia LEP's total Growth Deal from Government is £223.5m to 2021. To date, it has led to the creation of 3,005 jobs, 2,189 new learners, 802 new homes, and matched funding totalling £676.4m.

B10 STEAM report - 2023

STEAM is a tourism economic impact modelling process designed to engage the client and maximise the benefit of local tourism expertise.

This measures key statistics of the impact of tourism and visitor economy in the Broads. The headlines are

- 7.5M visitors (+ 5.4%)
- Economic impact £711m (+15%...inflation caveat...although spending more, prices are up so not buying 15% more)
- Supporting around 7,000 jobs (+6.8%)

B11 Norfolk Strategic Planning Framework - 2021

The NSPF provides a structure for tackling these planning issues across the county, especially those which have a strategic impact across local authority boundaries. It includes guidance relating to housing, economic growth, infrastructure, and the environment. The NSPF informs the Local Plans produced by all the authorities.

Agreement 8 - Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan

Agreement 9 - 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.

Local Plan response – no Tier One Employment Sites are in the Broads.

Agreement 10 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

⁸ [Growth Deal - New Anglia](#)

Local Plan response – Part of Greater Norwich is in the Broads, and we work closely with the planning teams of the Greater Norwich Councils. The Acle Straight is part of the A47 that runs through the Broads and there is a policy relating to that. There is a small stretch of coast in the Broads and there is a policy relating to that.

B11 Lowestoft Town investment plan 2021 to 2031⁹

The vision:

"Post Covid-19, Lowestoft will be a place, both to live and to work locally as the need and desire to travel becomes reduced. Therefore there will be a need for quality mixed tenure of housing close to the centre. There will be aspiration and ambition so everyone aims higher and believes they can be successful in their place; skilled and self-reliant: focussing on up-skilling local people, attracting new talent where necessary and growing a sustainable local economic base; retaining and inspiring young people to grow and keeping our own talent. We will collaborate and connect across the region and to London; whilst digitally opening up job opportunities. We will work across sectors and be place led. We will become resilient and sustainable, being robust and adaptive in responding to climate change. We will come together as a community using our town centre as it becomes a vibrant hub. A centre where the needs of functionality and fun are met, some shopping provided but where culture, leisure and escapism have a leading role and given recent experiences the importance of our place being where we're happy and a place we call home."

Priority projects:

- Employment, enterprise and skills
- Transforming our town centre; retail and leisure
- Celebrating our culture and heritage
- living your life in Lowestoft
- collaboration and connecting

East Suffolk Council will coordinate the development of the individual business cases for the prioritised Towns Fund projects along with project partners, including Associated British Ports, the Marina Theatre Trust and Lowestoft Town Council. As a part of the prioritisation process, projects have already gone through an outline business case project template, which will be developed into full business cases in-line with HM Treasury Green Book Business Case Guidance

⁹ [Lowestoft-Town-Investment-Plan.pdf \(eastsuffolk.gov.uk\)](#)

Appendix C: Economic Baseline

C1 Out of work benefits (Wards)¹⁰

The Parishes that are in the Broads Executive Area are in the following Wards. The percentage figures show the number of out of work benefits claimants as a proportion of resident population aged 16-64. The average for Great Britain is 3.7%. as at September 2023 Red highlights the highest level and green highlights the lowers level. Please note that in most cases only part of the Parish is in the Broads Executive Area; this is the best data available for monitoring unemployment levels in the Broads.

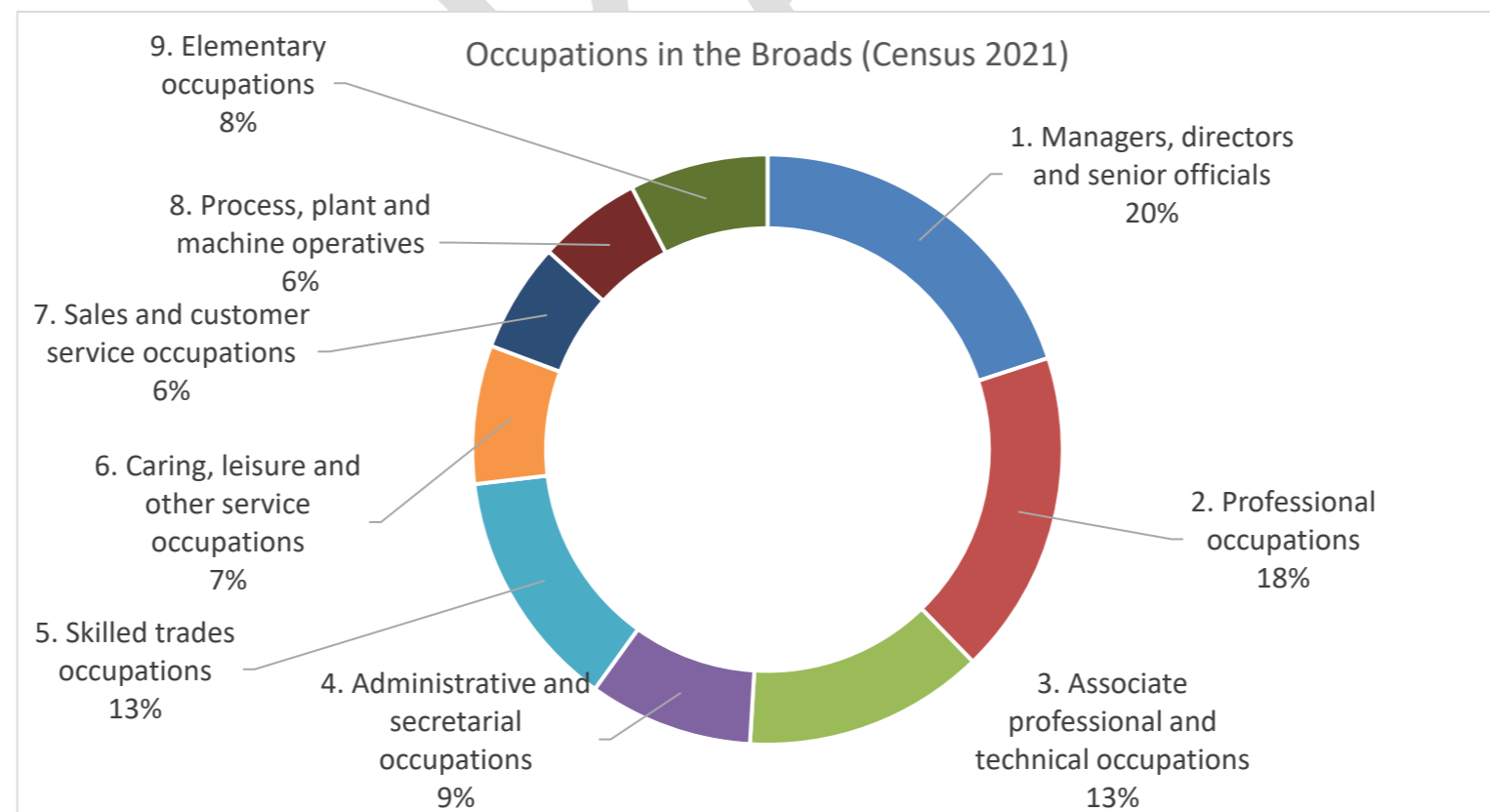
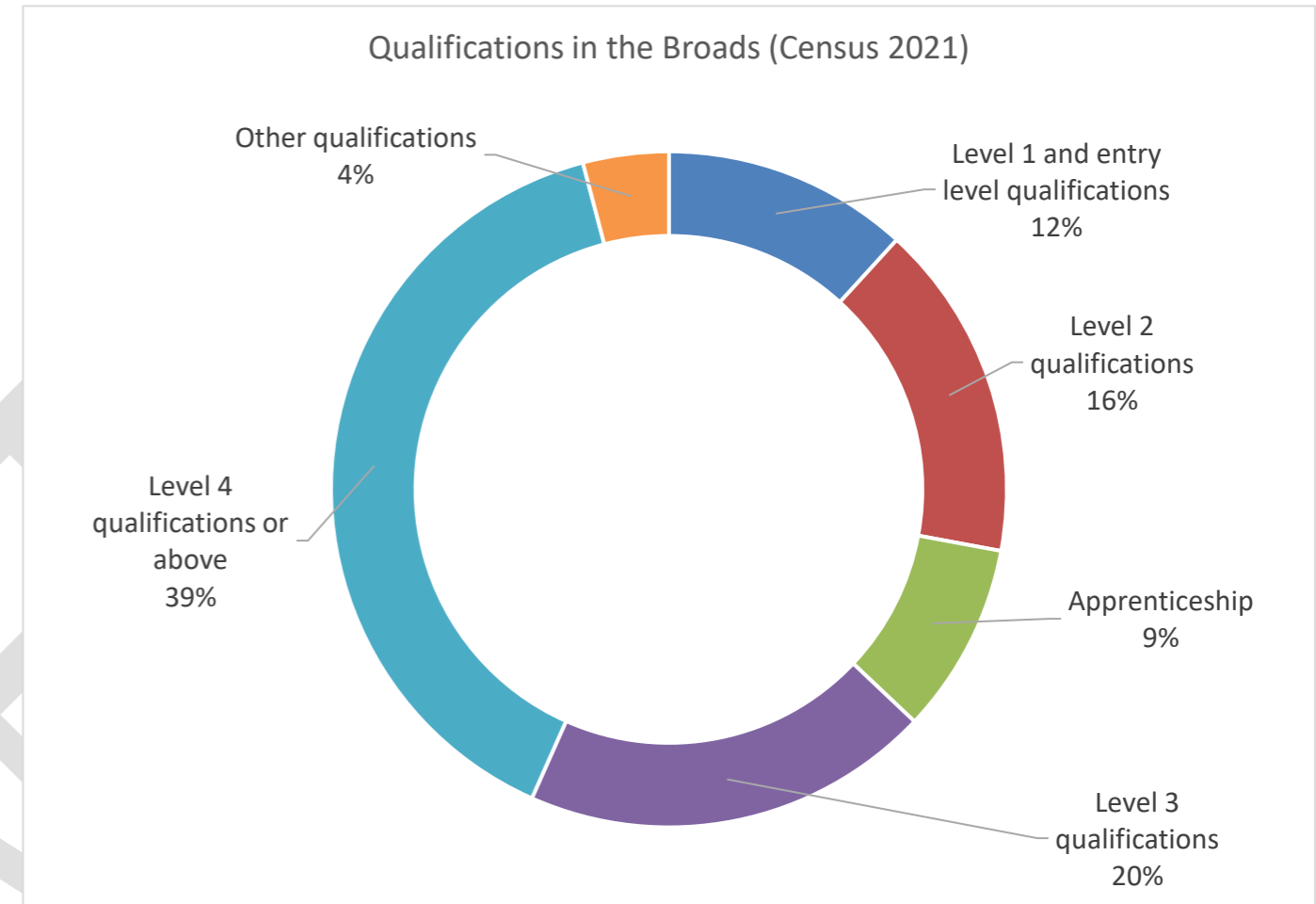
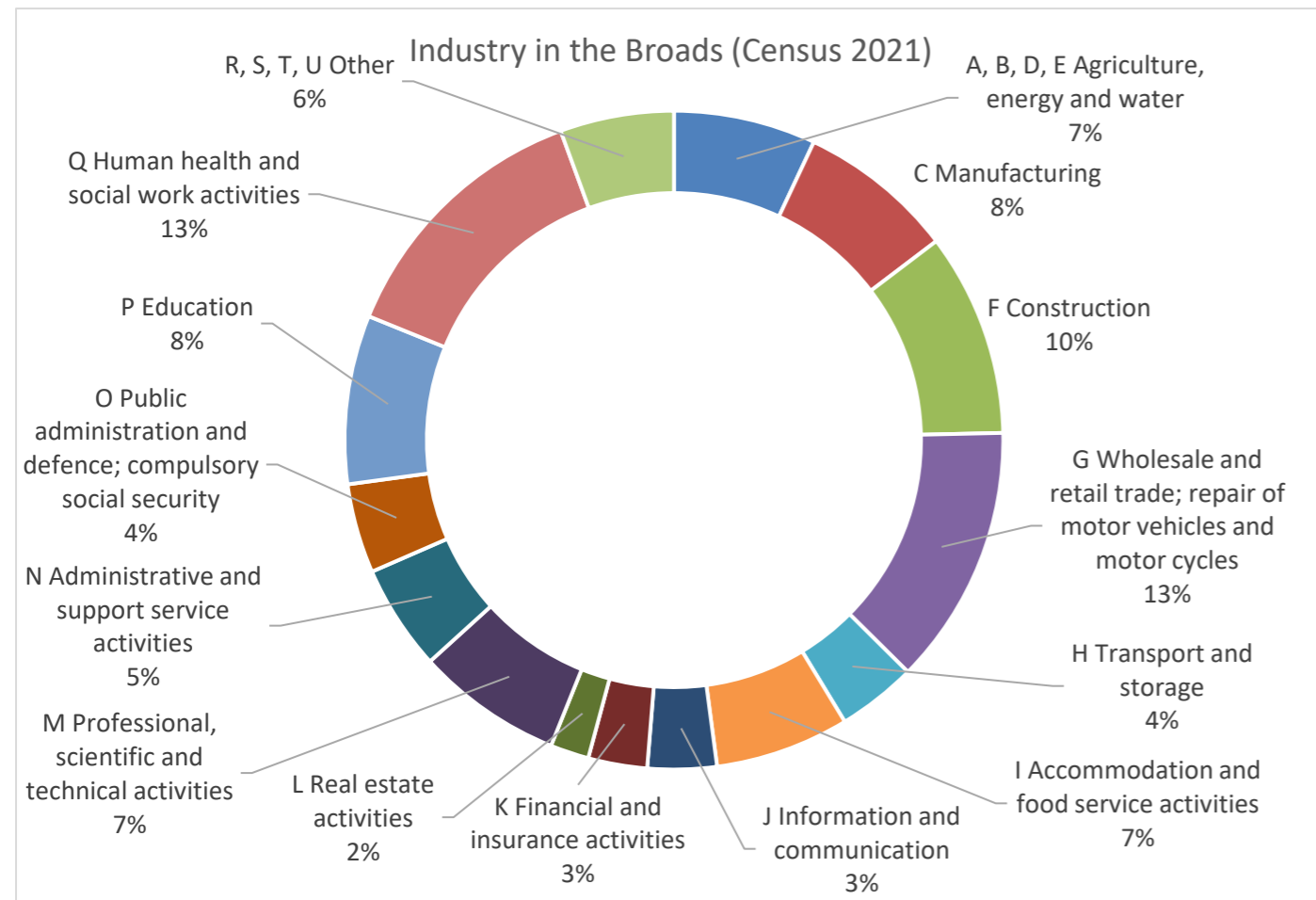
Ward	September 2021	September 2022	September 2023
33UCGN : Acle	2.4%	1.7%	1.6%
33UCGQ : Blofield with South Walsham	2.3%	1.6%	1.5%
33UCGR : Brundall	2.5%	1.6%	1.7%
33UCGT : Buxton	1.8%	1.5%	1.8%
33UCGU : Coltishall	2.8%	1.3%	1.6%
33UCHE : Marshes	2.7%	2.6%	1.9%
33UCHQ : Thorpe St Andrew South East	2.6%	1.6%	1.9%
33UCHR : Wroxham	2%	1.9%	1.9%
33UDFY : Bradwell North	2.2%	1.4%	1.7%
33UDGB : Caister South	3.5%	2.3%	2.7%
33UDGE : East Flegg	2.7%	2.5%	2.2%
33UDGF : Fleggburgh	2.5%	2.4%	1.9%
33UDGL : Ormesby	3.7%	2.3%	2.6%
33UDGP : West Flegg	2.7%	2%	2.3%
33UFGY : Happisburgh	2.8%	2.8%	1.7%
33UFHB : Hoveton	3.6%	2.1%	3.1%
33UFHM : Scottow	2.1%	1%	1.1%
33UFHR : Stalham and Sutton	3.7%	3%	3.3%
33UFHX : Waterside	3.3%	2.3%	1.7%
33UFHY : Waxham	2.4%	1.8%	1.3%
33UHHA : Chedgrave and Thurton	3.6%	2.8%	2.4%
33UHHF : Ditchingham and Broome	2.2%	1.7%	1.5%
33UHHG : Earsham	2.7%	2.3%	2.2%
33UHHK : Gillingham	2.9%	2.9%	2.5%
33UH HQ : Loddon	3.2%	3.2%	3.4%
33UH HY : Rockland	2.5%	1.4%	1.5%
33UH JC : Stoke Holy Cross	2.3%	1.6%	2.1%
33UH JF : Thurlton	2.9%	2.4%	1.9%
42UH FY : Beccles North	4.4%	3.3%	3.2%
42UH GB : Bungay	4.4%	3.4%	2.5%
42UH GD : Carlton Colville	2.8%	1.9%	1.8%
42UH GE : Gunton and Corton	2.7%	1.4%	1.8%
42UH GK : Lothingland (GYBC)	3.6%	2.4%	2.3%
42UH GN : Oulton Broad (Whitton)	3.5%	2.7%	2.1%

¹⁰ <http://www.nomisweb.co.uk>

Ward	September 2021	September 2022	September 2023
42UHGT : Wainford	2.6%	1.6%	2.1%
42UHGW : Worlingham	2.3%	2.2%	1.5%

DRAFT

C2 Census 2021 – statistics relating to the economy and employment.



Appendix D: Comments received as part of the Issues and Options consultation

The Consultation on the Issues and Options version of the Local Plan was held at the end of 2022. The comments relevant to economy and employment are as follows. The Issues and Options document can be found here: [The Local Plan for the Broads: Review - Issues and Options Consultation \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk)

D1 Farm diversification

Question 26: Do you support this policy approach generally?

Bradwell Parish Council	We feel that there needs to be more focus on crops to feed the nation, so we are more independent on the effects of international events. So if this means subsidies then so be it.
Broads Society	The Society generally supports the current Policy DM27.
East Suffolk Council	Appropriate diversification of farming is generally supported by East Suffolk Council. Paragraph 84 of the National Planning Policy Framework states that policies should enable, ‘the development and diversification of agricultural and other land-based rural businesses’. It is agreed that the approach should ensure land is not fragmented and that any diversification is supportive of the existing farm and does not reduce the farm’s overall viability. In accordance with policy DM27 of the Broads Local Plan utilising existing structures where possible is recommended.
RSPB	We don’t subscribe to the principle that as a general principle ‘farmers may need to make changes less beneficial to the countryside’. Can you expand or give examples of what this might entail, because as presented this statement appears very open-ended and unregulated? We do not contest the principle of farm diversification making farms more viable, but there need to be limits agreed to ensure a sustainable approach is adopted.

Question 27: Do you have any thoughts on this particular issue (subdivision/fragmentation) in relation to farm diversification? Do you agree that the uses should be linked, so that it remains associated with the farm?

Bradwell Parish Council	Bearing in mind my answer above then the purpose should be linked to food production in line with the farms original use.
Broads Society	The Society supports the idea that farms should not be fragmented but also feels that other uses not strictly related to the farm could be acceptable as long as they were closely related, locationally, to the existing built form of the farm.
East Suffolk Council	East Suffolk Council supports ensuring that farms are not fragmented which helps protect the viability of the wider area. This allows a greater degree of control over the land, avoiding new planning units with inappropriate or disruptive uses. The East Suffolk Council - Suffolk Coastal Local Plan (September 2020) takes a similar approach within Policy SCLP4.7 which requires farm diversification to ensure farming remains the predominant use on the site.

East Suffolk Council	The fragmentation of land may have a wider impact on the character of the area (whether positively or negatively). The important landscape character attributes are defined in the Broads Authority Landscape Character Assessment, and it is important to note the strong relationships between the landscape character within East Suffolk as defined in the Waveney District Landscape Character Assessment: https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf . Any adverse character impacts could have cross-boundary impacts.
RSPB	Agree with the principle of not allowing subdivision and fragmentation and that all land needs to be managed or 'developed.' There are huge benefits to wildlife in providing a network of locations (fields if you like) which provide rough ground for species such as owls. Not every speck of land needs to be worked. Longer term planning and contribution to the greater good of the landscape should be encouraged.

Question 28: Do you have any thoughts on requiring supporting viability information for farm diversification projects? What other information may be required to support applications?

Bradwell Parish Council	You definitely need to ask for supporting information on how the diversification project/proposal will enable the farm to be viable.
Broads Society	The Society considers that the submission of a viability statement is a great way of getting the applicant to focus on whether or not any proposal is really financially viable and beneficial to them in practical terms.
East Suffolk Council	Farm diversification allows for non-agricultural uses ensuring the farms continued viability. This can mean that jobs are retained, and food security is continued. The Broads Authority may wish to note that policy SCLP4.7 of the East Suffolk Council - Suffolk Coastal Local Plan requires similar viability information stating that diversification is supported subject to, 'e) The diversification is supported by detailed information and justification that demonstrates that the proposals will contribute to the viability of the farm as a whole and its continued operation'.
East Suffolk Council	In developing a policy approach for this area, the Broads Authority may wish to consider stating that the level of supporting viability information should be of a scale appropriate to the size of development and set out that details of what viability information is appropriate in either the policy or within an appendix.
RSPB	Yes, to requiring additional information on viability, especially the time frame for the proposed projects. As stated clearly market trends will play a large part in directing choices about direction of farm business but retention of a set approach for a longer period will offer greater value, except when unforeseen circumstances show the proposed direction of travel is no longer viable.

Question 29: Do you have any thoughts on conversion and new build in terms of farm diversification?

Bradwell Parish Council	Limit farm diversification so the focus is on availability for food production going forward.
Broads Society	The Society would agree that conversion is preferable to new build (particularly in relation to holiday accommodation provision). However, there are site specific instances where new build would be acceptable and should not be ruled out. A criteria based policy which could allow new build would be a better way forward than restricting it totally.
Designing Out Crime Officer, Norfolk Police	Norfolk Constabulary will continue to work with the Planning Officers and applicants for any significant new build to encourage and implement Secured by Design standards.
East Suffolk Council	It is often beneficial to seek the retention and conversion of an existing building, as opposed to new development, particularly where it ensures the retention of buildings with positive character impact. As the issues and options document states it also potentially reduces the carbon impact.
East Suffolk Council	The East Suffolk Council - Waveney Local Plan includes policy WLP8.15 for new self-catering tourist accommodation. The policy states that new permanent self-catered accommodation can be allowed in the countryside where it involves conversion of rural buildings subject to a set of criteria. Were the Broads Authority to take forward a similar approach in the new Local Plan, consideration should be given to how best to ensure tourist accommodation arising from farm diversification can be protected from pressure to become residential over time.
East Suffolk Council	The Broads Authority may also wish to note that the Waveney Local Plan includes other policies governing conversion of existing rural building, namely, policies WLP8.11 (to residential use) and WLP8.14 (to employment use).
RSPB	New build if construction is shown to have a low or long-term neutral Carbon footprint, and will sit well within the landscape, should be considered. However, conversion of more permanent new build (bricks and mortar) would suggest the developer hasn't fully thought through construction and should be avoided and discouraged. Conversion of existing buildings if done sympathetically, following guidance and design principles should be encouraged.
Sequence UK LTD/Brundall Riverside Estate Association	2.70We would broadly support a policy that allowed for conversion of farm and indeed other buildings to both holiday let and permanent residential. Current policies within the Broads Local Plan do make it more challenging to secure residential and holiday let conversion with a preference for buildings to be first retained in their current use. This is out of step with other Local Plan policies and indeed paragraph 80, part c of the Framework and therefore we would welcome policies allowing more straightforward residential and holiday let conversion.

Question 30: Do you have any thoughts on this particular issue (cumulative impact of farm diversification projects) in relation to farm diversification?

Bradwell Parish Council	The continued focus on diversification is not consistent with the country having self sufficiency in food production.
Broads Society	The Society feels that farm diversification should remain a subsidiary element to the overall agricultural function of the business and should not exceed more than 50% of the total business operation.
East Suffolk Council	As noted above, East Suffolk Council’s view is that proposals for farm diversification should support the viability of the farm which will remain the main, primary use. A continuous loss of farmland to more diverse uses could, on a planning balance, change the primary use and the planning use class meaning it could fail its original objective.
Luke Paterson	4.there is discussion around the nature and scale of farm diversification, farm diversification is very important with BPS being REMOVED and the energy crisis effecting farm profitability. Old buildings are not always efficient to heat and may not be as suitable as a new build. I have diversified into tourism and see that this is the direction of travel for my business to maintain its sustainability.
Luke Paterson	6.Farmers PD rights should not be curtailed.
RSPB	A complete business plan should define whether a particular diversification proposal is sound financially, will be acceptable in terms of design and will have no adverse impact on surrounding land, water, and other interests. It isn’t so much a case of whether a single farm has been diversified enough as much as it is the in-combination impact of several adjacent farms diversifying and changing the landscape character. However, even this approach should be given due consideration if the proposed approach is deemed to be more beneficial given prevailing impacts of climate change. The land management activity known to produce the highest release of CO2 into the atmosphere is arable cropping.

D2 Agriculture Development

Question 31. What are your thoughts on the need to address agriculture development in the new Local Plan? Are there any other issues to address if a policy were to be produced?

Bradwell Parish Council	Option b.
Broads Society	The Society’s preference is for ‘Option a’ to allow for a less constrained approach to any developing trends in the future. A specific policy might hamper an agricultural business from implementing speedier changes to the operation)
Designing Out Crime Officer, Norfolk Police	AS Q5 response - Consideration of condition of planning that the development and physical security meet Secured by Design standards.

East Suffolk Council	As the consultation document rightly sets out, agriculture is a key land use in the Broads and is important to the local economy. Within that context, there may be value in the Broads Authority giving further consideration to the feasibility of developing a new development management policy, specifically relating to agricultural buildings (option b).
Norfolk Wildlife Trust	Agricultural development – whilst we have no comments in principle on this question, we would recommend that any new development or renovation includes integral features of benefit for wildlife such as swift, bat and bee bricks, in order to help turn around the decline in these important species.
RSPB	Option b) should be chosen. A specific consideration relates to the creation of winter storage reservoirs to enable irrigation of arable crops and other forms of horticulture. Given the pressure on water resources and the Restoring Sustainable Abstraction decision made by Environment Agency facilitating the creation of new water storage reservoirs to capture winter rain and excess (perhaps reverse pumped storm flows) is paramount. This is especially attractive if farm clusters operate to create a shared structure as a single reservoir, which if sited appropriately is likely to have a lower impact on the landscape than several such structures if located on many individual farms. Obtaining planning permission for such structures is often a long-winded process and given these reservoirs protect both cropping and maintenance of groundwater sources, they should be applauded and supported.

D3 Existing policies

Question 46: Do you have any comments on the current policies in the Local Plan (2019)?

East Suffolk Council	<p>Common Lane North Employment Area</p> <p>Common Lane North Employment Area is designated in Waveney Local Plan Policy WLP8.12. The northeast section of Common Lane North Employment area is situated close to the Broads Authority area boundary. Both the employment area boundary and settlement boundary are tightly drawn around existing buildings. There would be no justification to extend the Employment area boundary further north into the Broads authority area.</p>
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Appendix E – responses from short technical consultation

Organisation	Comment	Response and way forward
Norfolk County Council	NCC are developing an Economic Strategy over the next 6 months.	Text added
East Suffolk Council	2.0 Key Findings: Potentially the headings could be more descriptive and explanatory within sections 2.1 through to 2.4. This depends on the intended audience but there are many statements within the bullet points that would benefit from additional context and relevance being expanded or explained. There is also a need to ensure consistency of the bullet labels used within the document.	Bullets made more consistent. This is a summary of more information in appendices – no change.
East Suffolk Council	3.0 How the Local Plan addresses Employment and the Economy: Again, the section would benefit from an extended introduction to provide context and explain the relevance of the policies that relate to the economy.	The introduction is quite clear in what this section talks about. It is not proposed to copy over the policies from the Local Plan. No change.
East Suffolk Council	Appendix A: The use of copy and paste to draw attention to relevant sections of extensive document can be appropriate but more explanation in the introduction would be recommended.	Again, introduction and purpose of this section is clear.
East Suffolk Council	Appendix B: The section would also benefit from a brief critical appraisal of the available evidence. For example, there is no explanation as to what is meant by the Volume or Value of Tourism, the strengths and weaknesses of this study.	The aim of the section is to refer to relevant literature. This is done by summarising what the literature says. Links are provided to the documents so they can be accessed if the reader desires. No change.
East Suffolk Council	Appendix C: The economic baseline could also benefit from a critical appraisal or explanatory note about their inclusion. Something that would inform any lay person reading the document.	The date is self-explanatory. Relevant information is included in the Local Plan. No change.
East Suffolk Council	Appendix D: Depending on the purpose and use of the paper, the 'raw' consultee responses may have benefited from a qualitative assessment to highlight the key issues identified.	The section includes the response verbatim which is our preferred approach. No change.

Organisation	Comment	Response and way forward
East Suffolk Council	Page 2. 1. Introduction – Could detail be added in how the evidence in the document was assembled?	Agreed. Text added.
East Suffolk Council	2.1 b) The use of just East Suffolk Council as a term would be fine.	Changed.
East Suffolk Council	d) Could this point be expanded by a sentence explaining the evidence that led to the Broads Authority not needing an employment target?	Agreed. Text added.
East Suffolk Council	e) Similar to above, a sentence explaining the reason why would be useful.	Agreed. Text added.
East Suffolk Council	h) Could be defined 'retail work'?	The word 'studies' used instead.
East Suffolk Council	2.2 Perhaps some examples of the 'other documents' would be useful	These are included in the literature review. No change.
East Suffolk Council	Page 3. 2.3 Potentially clarify that the local authority references specifically to the Broads Authority area.	This comment is not clear. There is no such reference in that section. No change.
East Suffolk Council	Assume the last 2 bullet points are not from the census so should be sourced separately.	Sources added.
East Suffolk Council	2.4 Do the headers need to include the original question to give a more clear explanation?	Appendix D includes the questions. No change.
East Suffolk Council	Page 8 Appendix B the paragraph says '2020 The Tourism Company 9', which appears to be an error. Here and elsewhere what appears to be a footnote should be superscript to be clear.	Amended.
East Suffolk Council	Page 9 Primary target Markets, percentages of visitors falling into each type would be interesting.	Information not available.
East Suffolk Council	Page 10 B2 Broads Plan should this be at the top? Everything should be linked back to the Broads Plan.	The literature review is not in any particular order. Content with how it is presented. No change.
East Suffolk Council	Page 11 B4 could note that the needs assessment is to 2031.	Added.
East Suffolk Council	Page 15 Reference has been made to the Norwich Plan but could the Lowestoft Plan also be included?	Added.
East Suffolk Council	Page 18 B9 Is this still active? Worth checking	The Strategy is still on the website. No change.
East Suffolk Council	Perhaps more explanation of STEAM could be useful	Explanation added.



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
February 2024**

Quay heading and boardwalks – use of materials

This is a proposed draft section/policy for the Preferred Options Local Plan. Member’s comments and thoughts are requested.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

PODMx: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks.

General principles

- 1) The choice of material used for new or replacement quay heading, boardwalks and other such uses will be of a high quality and suitable for its location and appropriate for its intended use. Each scheme will be judged on a case-by-case basis.
- 2) Proposals need to consider and address safety of the surfaces, and how and when they will be used.

Proposals for quay heading, landing stagings and capping and waling.

- 3) The Authority’s preference is that schemes use timber.
- 4) In areas where a more resilient material is needed, the justification for the use of a material other than timber will need to be demonstrated by the applicant and considered on a case-by-case basis.

Proposals for boardwalks, small bridges and viewing platforms and similar schemes

- 5) The choice of materials needs to be justified based on location.
- 6) In choosing materials, applicants need to show they have considered and addressed the visual impact of the materials as well as sustainability credentials.

Principles for the use of recycled plastic

- 7) Recycled plastic will not automatically be acceptable in all locations as its suitability depends on the design of the material proposed to be used and its appearance and

21 therefore impact on the sensitivity and character of the area. If recycled plastic is
22 considered appropriate, the following criteria must be addressed:

- 23 a) Why recycled plastic is considered acceptable in a particular location, operationally to
24 reflect the physical conditions on the site (such as soil type and load bearing required)
25 and what it will be used for, as well as impact on landscape and heritage, must be fully
26 justified; and
- 27 b) Must be recycled plastic; and
- 28 c) Recycled plastic used must be of high quality with an appearance similar to timber; and
- 29 d) Must remove any 'old' plastic; and
- 30 e) The structure and materials must be prepared off site and the construction methodology
31 must capture the plastic waste. A method statement for construction must be provided
32 to the Authority.

33 **Reasoned justification**

34 As the interface between water and land, it is important that moorings and boardwalks are
35 properly considered and well designed. The Broads Authority welcomes the right type of
36 safe design in the right place. Making the right materials choice can be essential in ensuring
37 your work complements the local character as well as being important in terms of the
38 quality and lifespan of your structure.

39 When considering what material to use, assess the environmental and heritage sensitivities,
40 likely footfall, strategic location (i.e. isolated or close to school/towns etc) and level of
41 accessibility which could be possible.

42 This policy is to be read in conjunction with other policies of the Local Plan, including in
43 particular, the [moorings](#) and [bank stabilisation](#) policies and guides.

44 **Installation**

45 As set out in the policy, we require a method statement to be submitted. This needs to
46 show how you plan to install the scheme that you are seeking permission for.

47 We expect as much preparatory work as possible to be completed off site. This is to prevent
48 any waste materials from going into the water as well as limiting any time spent on site with
49 associated impacts on wildlife and habitats, as well as use of the area by people.

50 **Timber and Steel**

51 These materials have been traditionally used in the Broads and have the least visual impact
52 due to their appearance.

53 The benefit of using timber include its traditional appearance and the way in which it
54 weathers, reducing its visual impact over time. Its use supports traditional industries and
55 crafts. It is also encouraged because the use of sustainably sourced timber is far more
56 environmentally friendly than other materials.

57 Steel, used with a timber cap and waling is a traditional feature of urban sites or sites which
58 require hard wearing riverbank protection (such as within high tidal zones or areas with high
59 boat use).

60 There may be very sensitive sites where timber (and not steel) will be most appropriate.
61 There will also be sites (for example in rural areas), where the introduction of quay heading
62 would not be considered appropriate.

63 **Recycled Plastic**

64 Recycled plastic may be acceptable, but it depends on the setting and sensitivity and the
65 product used. The Authority acknowledges that recycled plastic can have its merits, but the
66 policy clearly identified issues that need to be addressed.

67 Some recycled plastic products are obviously plastic, can have obviously faux or repeated
68 patterns, unnecessarily shiny, and do look alien in their surroundings. There are products on
69 the market that are softer, less obvious and non-uniform pattern, texture and appearance
70 of timber and it is these products that are expected to be used. There are many different
71 types and varieties of recycled plastics and so physical samples will need to be submitted to
72 be agreed in most instances. In order to capture plastic shavings and micro plastics and
73 prevent these from entering the water courses and ecosystems, as much work will need to
74 be completed away from the site and an explanation of how shavings will be captured and
75 disposed of is required.

76 The policy covers boardwalks and quay heading and associated capping and whaling. It does
77 not cover piling. Indeed, at this time, it is not likely that the use of plastic piling is to be
78 supported due to its structural capacity not being clear.

79 **Reasonable alternative options**

80 a) No specific policy.

81 **Sustainability appraisal summary**

82 The following is a summary of the assessment of the policy.

A: Preferred Option	7 positives. 0 negatives. 0 ? Overall positive
B: No specific policy.	0 positives. 0 negatives. 7 ?

83 **Why have the alternative options been discounted?**

84 It is more common for schemes to seek to include recycled plastic. Given that the Broads is a
85 protected landscape and given the potential impacts the wrong material, constructed
86 wrongly in the wrong way could have, a policy is favoured.

87 **UN Sustainable Development Goals check**

88 This policy meets these [UN SD Goals](#):



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

	A: Preferred Option	B: No specific policy.
ENV1		
ENV2	+ Policy refers to capturing plastic waste.	?
ENV3	+ Policy refers to capturing plastic waste.	?
ENV4	+ General thrust of the policy is the right material in the right place.	?
ENV5		
ENV6		
ENV7	+ If plastic is to be used, it must be recycled plastic which is therefore efficient use of materials.	?
ENV8	+ If plastic is to be used, it must be recycled plastic which is therefore efficient use of materials.	?
ENV9	+ General thrust of the policy is the right material in the right place.	?
ENV10	+ General thrust of the policy is the right material in the right place.	?
ENV11		
ENV12		
SOC1		
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		
SOC7		
ECO1		

Not having a policy does not mean that these issues will not be considered. Having a policy provides more clarity and certainty.



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
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Gypsy, Traveller and Travelling Show People

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

- 1 **Policy PODM36: Gypsy, Traveller and Travelling Show People**
2 Development proposals for the provision of permanent or transit accommodation, or temporary
3 stopping places, to meet the needs of Gypsies and Travellers and Travelling Show People will be
4 supported where they meet an identified need.
- 5 Development proposals that would have an adverse impact on the special qualities of the Broads
6 will be refused.
- 7 Where there is a proven need, appropriate development will be allowed where the following
8 criteria are met:
- 9 a) Avoid sites being over-concentrated in any one location or disproportionate in size
10 to/dominating nearby communities;
11 b) Well related to existing settlements, services and facilities and do not harm the character and
12 appearance of the area;
13 c) Within reasonable distances to facilities and supporting services that can be accessed by various
14 mode of transport, not just motor vehicles;
15 d) There are no severe residual impacts on the safe and efficient operation of the highway
16 network;
17 e) There is adequate provision for parking, turning and safe manoeuvring of vehicles within the
18 site;
19 f) Transit sites should be in close proximity to the main established travelling routes in the area;

- 20 g) Have clearly defined physical boundaries with appropriate boundary treatments and will be
21 appropriately screened and landscaped and be capable of visual privacy;
- 22 h) The site will not ~~have~~ harm the setting of any heritage asset or have any adverse impact on the
23 character and appearance of the surrounding landscape;
- 24 i) Sites are well planned or soft landscaped in such a way as to positively enhance the
25 environment and increase its openness;
- 26 j) Play areas for children are included as appropriate;
- 27 k) Lighting meets the requirements of the dark skies policy (dm xx)
- 28 l) Permanent built structures in rural locations or on settlement fringes are restricted to essential
29 facilities;
- 30 m) There is sufficient amenity space for occupiers;
- 31 n) The design, layout and density of the site are based on relevant guidance and standards and
32 reflect both the location of the site and the needs of the users; ~~Government guidance in~~
33 'Designing Gypsy and Traveller Sites'¹ (or successor documents);
- 34 o) Sites or pitches are capable of being provided with adequate infrastructure such as power,
35 water supply, foul water drainage and recycling/waste management;
- 36 p) Proposals do not cause unacceptable harm to the amenity of neighbouring uses and occupiers
37 and the tranquillity of the area;
- 38 q) Due regard has been given to all types of flood risk;
- 39 r) Depending on location, nutrient enrichment and recreation impacts will be mitigated;
- 40 s) Schemes provide Biodiversity Net Gain if required. If BNG is not required, provide biodiversity
41 enhancements (see policy DMx on the Natural Environment):
- 42 t) Site design will need to be resilient to a changing climate, for example by considering and
43 addressing shade for hotter temperatures as well as accommodation intense rain bursts; and
- 44 u) Sites are not proposed which will adversely impact on protected species, priority habitats and
45 designated wildlife sites.

46 Schemes should make effective use of previously developed (brownfield) land.

47 Transit or temporary sites may have conditions applied relating to length of occupancy in
48 consultation with the Housing Authority.

49 **Reasoned justification**

50 This criteria-based policy enables the Authority to assess any applications that may come forward
51 for such sites. The justification for each of the criteria in the policy is discussed below.

52 **Location of sites**

53 Sites in or near to existing settlements are prioritised. Such sites are generally more sustainable
54 than those in remote areas, with better access to services, in particular education and health
55 services. The Authority's preference would be for well related sites located in and near to
56 settlements with a development boundary (either in the Broads Authority Executive Area or in one
57 of our constituent district council's areas), and/or classed as local service centres and above in the
58 settlement hierarchy of our constituent districts. The priority will be that access to services can be
59 reasonably obtained so as to meet the day to day needs of the occupiers, recognising the
60 differences in lifestyles, working patterns and transport preferences. The criteria used in the
61 Settlement Study could be used to determine how well related to settlements proposals are.

¹ Designing Gypsy Sites: www.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf

62 To provide a healthy and safe environment for occupiers, sites should not be located on
63 contaminated land and should avoid areas of unsuitable noise, air quality and major hazards such
64 as pipelines. In line with adopted amenity, tranquillity and light pollution policies, the proposals
65 should not have a negative impact on neighbours and tranquil areas, and should have appropriate
66 lighting that does not add to light pollution.

67 Previously developed/brownfield land

68 National planning policy encourages planning policies and decisions to encourage the effective use
69 of land by re-using previously developed land (brownfield land), provided that it is not of high
70 environmental value. The Authority encourages the use of brownfield land for development ahead
71 of greenfield land. Other policies in the Local Plan may be of relevance in this regard such as
72 landscape character impact, impact on peat and high quality agricultural land.

73 Access

74 Gypsy and Traveller sites are required to have safe and convenient vehicular access and provide
75 adequate car parking space. The development should avoid significant impacts on local roads and
76 be well located to major routes.

77 Screening and impacts of proposals

78 The Broads has a wealth of environmental assets, and site locations must not compromise the
79 objectives of any designated areas.

80 The local topography and form of the landscape will affect the visibility of a Gypsy and Traveller site
81 and its ability to integrate into its surroundings. Some sites will be highly visible and others more
82 visually contained. The Broads is a protected landscape and sites should respect the local
83 environment, including the historic environment, be of a scale proportionate to the local
84 community and be capable of visual privacy. Sites which allow appropriate natural screening will be
85 considered more favourably. Other relevant policies of the Local Plan are policy DM16 on
86 Landscape, policy DM43 on Landscaping and policy DM20 on Settlement Fringe. ~~The Government's
87 design guide for Gypsy and Travellers emphasises key elements necessary to design a successful
88 site.~~

89 Proposals shall not enclose a site with so much hard landscaping, high walls or fences, that the
90 impression may be given that the site and its occupants are deliberately isolated from the rest of
91 the community.

92 Service infrastructure

93 To meet the needs of occupiers, proposals need to be capable of being served by appropriate
94 service infrastructure, including public and/or private water supplies and treatment works as
95 appropriate (see policy DM2 on Water Quality).

96 Planning conditions

97 Any planning permission will include a planning condition or obligation to ensure that occupancy of
98 the site is limited to persons able to demonstrate an essential need for the accommodation. When
99 any temporary permission is granted, a planning condition will be attached or an obligation secured
100 to ensure that the permission is for a limited time period, after which time the use shall cease and
101 the land must be restored to its former condition, within a specified period.

102 **Flood risk**

103 Caravans and mobile homes are vulnerable to flooding. National and local policies dictate that sites
104 should not be allocated in areas of high risk of flooding, including that of functional flood plains.

105 Policy DM5: Development and flood risk could be of relevance because any Flood Risk Assessment
106 for such accommodation would need to show how the safety of the occupants would be managed
107 and ensured, considering the transient nature of the site and its potential effects on the occupant's
108 ability to receive flood warnings.

109 **Need**

110 ~~According to the Gypsy and Traveller Accommodation Needs Assessment (2017) there is no~~
111 ~~identified need for sites or pitches within the Broads Authority Executive area.~~

112 It should be noted that work to assess the need for the rest of the Broads Authority Executive Area
113 will commence around April 2024 and will inform the next version of the Local Plan.

114 There is a Call for Sites form for any Gypsy and Traveller sites – see section xxx.

115 The Government's Planning Policy for Traveller Sites document states '*where there is no identified*
116 *need, criteria-based policies should be included to provide a basis for decisions in case applications*
117 *nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional*
118 *and nomadic life of travellers while respecting the interests of the settled community*'.

119 The policy refers to there being an identified need in order for sites to be considered within the
120 Broads. This need could be identified through a local survey or through liaison with the district's
121 housing team.

122 **Reasonable alternative options**

- 123 a) No policy
- 124 b) Original policy

125 **Sustainability appraisal summary**

126 The three options (of having a policy and not having a policy and the amended policy) have been
127 assessed in the SA. The following is a summary.

A: Policy – Preferred Option	13 positives. 0 negatives. 0 ? Overall, positive.
B: No policy	0 positives. 0 negatives. 13 ?
C: Original policy	11 positives. 0 negatives. 0 ? Overall, positive.

128 **How has the existing policy been used since adoption in May 2019?**

129 According to recent Annual Monitoring Reports, the policy has not been used.

130 **Why have the alternative options been discounted?**

131 The amendments follow the Planning Policy for Traveller Site as well as well as referring to nutrient
132 enrichment, recreation impacts and biodiversity considerations and is favoured as it updates the
133 policy and provides more detail.

Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

	A: Amended policy		B: No policy	C: Original policy	
ENV1	+	Access, impact on roads and sustainable location requirements form part of the policy.	?	+	Access, impact on roads and sustainable location requirements form part of the policy.
ENV2	+	Water supply and drainage are considerations raised in the policy.	?	+	Water supply and drainage are considerations raised in the policy.
ENV3	+	Refers to impact on priority habitat. Biodiversity enhancements, nutrient enrichment, recreation impacts and biodiversity net gain form part of the policy.	?	+	Refers to impact on priority habitat.
ENV4	+	Impact on landscape character is a consideration in the report.	?	+	Impact on landscape character is a consideration in the report.
ENV5	+	Policy refers to climate change resilience.	?		
ENV6	+	Flood risk is referred to in the policy.	?	+	Flood risk is referred to in the policy.
ENV7	+	Policy promotes brownfield land for sites.	?		
ENV8	+	Policy refers to ability to dispose of waste.	?	+	Policy refers to ability to dispose of waste.
ENV9	+	Impact on heritage assets is a consideration in the report.	?	+	Impact on heritage assets is a consideration in the report.
ENV10	+	Taken together, the criteria in this policy will enable a well-designed site.	?	+	Taken together, the criteria in this policy will enable a well designed site.
ENV11	+	Policy refers to addressing any light pollution.	?		
ENV12					
SOC1					
SOC2					
SOC3					
SOC4	+	Policy relates to a housing need.	?	+	Policy relates to a housing need.
SOC5					
SOC6	+	Policy requires well located sites.	?	+	Policy requires well located sites.
SOC7					
ECO1					
ECO2					
ECO3					

Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
February 2024**

Strategic housing needs policy

This is a proposed draft section/policy for the Preferred Options Local Plan. Member’s comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy POSP15: Residential development

Meeting the Objectively Assessed Housing Need

1) The Authority will endeavour to enable housing delivery to meet its objectively assessed housing need throughout the Plan period (2021 to 2041) which is 358 ~~286~~ dwellings¹. ~~The Broads is within 3 housing market areas and the need within each HMA is as follows:~~

- ~~• Central Norfolk HMA: 163~~
- ~~• Waveney HMA: 57~~
- ~~• Great Yarmouth Borough HMA: 66~~

~~The Authority will allocate land in the Local Plan to provide around 146 net new dwellings. To meet the remaining requirement of 38 dwellings to 2036, which falls within that part of the Broads in the Borough of Great Yarmouth, the Authority will work with Great Yarmouth Borough Council to address housing need.~~

2) A contribution from housing development towards the provision of affordable housing will be sought.

¹ Local Housing Needs Assessment for the Broads: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0026/432476/Great-Yarmouth-and-The-Broads-Authority-LHNA_Final-Version-2.pdf

Meeting the Objectively Assessed Residential Moorings Need

- 3) The Authority will endeavour to enable residential moorings delivery to meet its objectively assessed residential moorings need throughout the Plan period (2021 to 2041) which is 48 residential moorings.

Meeting the Objectively Assessed Gypsy and Traveller and Travelling Show People Need

- 4) At the time of finalising the Local Plan, this piece of evidence had been delayed. As such, there is a call for sites for Gypsy and Traveller pitches around the Broads. The final draft Local Plan will contain information on need.

The type of new homes

- 5) The size and type of homes for each proposal will be based on up-to date evidence of local needs. A suitable mix will be determined through liaison with housing authorities and rural housing enablers where applicable. The size of dwellings will be commensurate with the latest Local Housing Needs Assessment ~~Strategic Housing Market Assessment~~.

Protecting European Sites

- 6) Project Level Habitats Regulation Assessments will be needed to assess implications on sensitive European Sites. Measures to mitigate for the effects of new housing growth may be required. This could include the need to address recreational impacts and/or nutrient enrichment impacts, depending on the location of the development.

Spatial Strategy

- 7) The Authority will direct development to meet the amount of housing as set out in this policy to the following locations:
- a) For residential dwellings:
- i) Development proposals will be located to protect the countryside from inappropriate uses to achieve sustainable patterns of development, by concentrating development in locations with local facilities, high levels of accessibility and where previously developed land is utilised; or
- ii) Brownfield sites at Pegasus in Oulton Broad, Utilities Site in Norwich, ~~sites off Station Road in Hoveton~~ and Hedera House in Thurne, and the greenfield site at Stokesby, as detailed in the site allocation section of this Local Plan²; or
- iii) In relation to windfall, those areas within development boundaries as detailed in policy DM35; or
- iv) Housing will only be permitted elsewhere where it is necessary, and subsequently retained, in connection with rural enterprises (DM38), replacement dwellings (DM40) or to provide affordable housing where local need has been demonstrated in District Councils' or local housing needs surveys.
- b) For residential moorings,
- v) The following boatyards/marinas are allocated: Brundall Gardens Marina, Greenway Marine (Chedgrave), Hipperson's Boatyard (Gillingham), Loddon Marina, Somerleyton Marina, Richardson's (Stalham Staithe).

² Please note that the sites at Oulton Broad and Thurne all have planning permission. Their allocations continue in the Local Plan as the schemes have not been completed yet. We have not included their numbers in meeting the current need, as they were permitted prior to 2021. The site at Stokesby also has planning permission and this was granted May 2021 – the 4 dwellings have been included as permissions rather than by considering the allocation.

vi) In relation to windfall, is in a mooring basin, marina or boatyard that is within or adjacent to a defined development boundary or 800m/10 minutes walking distance to three or more key services (see reasoned justification to PODM37) and the walking route can be used and likely to be used safely, all year round or is in Norwich City Council's Administrative Area.

c) For Gypsy and Travellers and Travelling Showpeople

i) In relation to windfall, are well related to existing settlements, services and facilities.

Loss of housing or residential moorings

8) Development proposals that result in a net loss of housing, permitted/lawful gypsy and traveller sites or residential moorings are not likely to be supported unless there is a clear justification submitted as part of a planning application.

Stepped housing requirement

9) The Authority has adopted a stepped housing requirement to reflect the inclusion of a strategic site, namely the Utilities Site, which is part of the wider East Norwich Regeneration Scheme. The stepped housing requirement is set out in the supporting text to this policy.

Reasoned Justification

The Objectively Assessed Housing Need for the Broads is as follows:

~~The 2012 NPPF required local planning authorities to meet housing need in the housing market areas. As such, the evidence base used to inform this policy as well as the policy itself were prepared in line with the 2012 NPPF's requirements.~~

~~The Broads Authority Executive Area is part of three separate Housing Market Areas (HMAs):~~

Housing Market Area	Districts in the HMA	Strategic Housing Market Assessment (SHMA) progress
Central Norfolk	North Norfolk, South Norfolk, Norwich, Broadland, Breckland	Completed 2017
Great Yarmouth	Great Yarmouth	Completed 2013
Waveney	Waveney	Completed 2017

~~As most of the Broads Authority Executive Area is within the Central Norfolk Housing Market Area, the Central Norfolk Strategic Housing Market Assessment³ (SHMA) calculated the Objectively Assessed Housing Need for the entire Broads area, and this is shown in the following table. The Housing Need Topic Paper⁴ gives more detail on the methodology and findings of the study. The OAN is for the period 2015 to 2036.~~

³ A SHMA is a study which identifies housing need for an area. The 2017 version of the Central Norfolk SHMA can be found www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2

⁴ Housing Topic Paper, Revised July 2017: www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2

District	Objectively Assessed Housing Need	Annual average from <u>2021 to 2041</u>
Broadland	<u>105</u>	<u>5.25</u>
North Norfolk	<u>97</u>	<u>4.85</u>
Norwich	<u>6</u>	<u>0.3</u>
South Norfolk	<u>68</u>	<u>3.4</u>
Great Yarmouth	<u>59</u>	<u>2.95</u>
<u>East Suffolk</u>	<u>23</u>	<u>1.15</u>
Total:	<u>358</u>	<u>17.9</u>

85 For the avoidance of doubt, each element of the Broad's Objectively Assessed Need identified in
86 the table above for each of the six districts also forms part of each district's **Housing Market Area**
87 objectively assessed need and is not additional to.

88 The residential moorings need is 48.

89 The Gypsy and Traveller need is <<to be included in next version of Local Plan>>

90 ~~The need for the Broads Authority Executive Area part of each HMA is as follows:~~

- 91 • ~~Central Norfolk HMA: 163~~
- 92 • ~~Waveney HMA: 57~~
- 93 • ~~Great Yarmouth Borough HMA: 66~~

94 ~~The NPPF at Para 47 says Local Planning Authorities should meet the need unless policies in the~~
95 ~~2019 NPPF provide a strong reason for not doing so or adverse impacts significantly outweigh~~
96 ~~benefits when policies in the NPPF 2019 are considered. It is important to note that the 2019 NPPF~~
97 ~~places great weight on the status of the Broads:~~

- 98 • ~~Paragraph 11 b) 'strategic policies should, as a minimum, provide for objectively assessed needs~~
99 ~~for housing and other uses, as well as any needs that cannot be met within neighbouring~~
100 ~~areas⁵, unless:~~
101 ~~i. the application of policies in this Framework that protect areas or assets of particular~~
102 ~~importance provides a strong reason for restricting the overall scale, type or distribution of~~
103 ~~development in the plan area⁶;~~

104 The NPPF at paragraph 11. b) requires Local Planning Authorities to meet the needs for housing,
105 but the through the footnotes, protects the Broads as follows:

- 106 'strategic policies should, as a minimum, provide for objectively assessed needs for housing and
107 other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:
108 i. the application of policies in this Framework that protect areas or assets of particular importance
109 provides a strong reason for restricting the overall scale, type or distribution of development in the
110 plan area⁷; or
111 ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits,
112 when assessed against the policies in this Framework taken as a whole'.

113 Footnote 6 'As established through statements of common ground (see paragraph 27)'.

114 Footnote 7 ‘The policies referred to are those in this Framework (rather than those in development
 115 plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites
 116 of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of
 117 Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage
 118 Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of
 119 archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change’.

120 **The Housing Target for the Local Plan for the Broads and how this will be met.**

121 The Authority must balance the demands of meeting the housing needs and protecting the special
 122 qualities of the Broads. The Housing Target for the Broads is ~~286~~ 358 net new dwellings as set out
 123 in SP15. ~~The Broads is within three housing market areas and the need within each HMA is as~~
 124 ~~follows:~~

- 125 • ~~Central Norfolk HMA: 163~~
- 126 • ~~Waveney HMA: 57~~
- 127 • ~~Great Yarmouth Borough HMA: 66~~

128 ~~As such,~~ The housing need for the Broads is met in the following ways. ~~As the Housing Need Topic~~
 129 ~~Paper shows, the housing need has been exceeded in the Central Norfolk and Waveney Housing~~
 130 ~~Market Areas.~~

131 For residential dwellings

- 132 i) Completions and permissions between April 2021 and April 2023 as well as allocations in
 133 this Local Plan (that have not commenced). This shows a residual need of 58 dwellings.

<u>District</u>	<u>Completions</u>	<u>Permitted</u>	<u>Allocations</u>	<u>Total</u>
<u>Broadland</u>	<u>2</u>	<u>6</u>	<u>0</u>	<u>8</u>
<u>North Norfolk</u>	<u>3</u>	<u>1</u>	<u>0</u>	<u>4</u>
<u>Norwich</u>	<u>0</u>	<u>0</u>	<u>NOR1: 271</u>	<u>271</u>
<u>South Norfolk</u>	<u>2</u>	<u>0</u>	<u>0</u>	<u>2</u>
<u>Great Yarmouth</u>	<u>2</u>	<u>7</u>	<u>0</u>	<u>9</u>
<u>East Suffolk</u>	<u>3</u>	<u>3</u>	<u>0</u>	<u>6</u>
<u>Totals</u>	<u>12</u>	<u>17</u>	<u>271</u>	<u>300</u>

- 134 ii) A second call for sites

135 A call for sites was held during the Issues and Options consultation. Some sites for housing were
 136 put forward, but through the HELAA process, were deemed not suitable for development and
 137 consequently, not allocated in the Local Plan. This Preferred Options version of the Local Plan
 138 contains another call for sites.

- 139 ~~iii) Cooperating with Great Yarmouth Borough Council~~ Cooperating with Neighbouring Districts

140 ~~There is a residual need in the Great Yarmouth Housing Market Area for 38 dwellings. Great~~
 141 ~~Yarmouth Borough Council, in their representations to the Local Plan Issues and Options~~
 142 ~~consultation, stated that they do not consider it appropriate for the Broads to be obliged to meet~~
 143 ~~the housing need in the Great Yarmouth area because of the special qualities of the Broads. They~~
 144 ~~have already included the whole of the Borough, including that part within the Broads, in their~~
 145 ~~assessment of the Borough’s housing needs.~~

146 ~~The Great Yarmouth Borough area of the Broads Authority is constrained from flood risk and~~
147 ~~European designated sites. Furthermore there are more sustainable locations, subject to fewer~~
148 ~~constraints, outside of the Broads Authority Executive Area where it is more prudent to develop~~
149 ~~land for residential dwellings.~~

150 ~~They are keen for the signed Memorandum of Understanding to stay in place, and to continue the~~
151 ~~arrangement that, while the Borough will endeavour to meet the whole of its needs outside the~~
152 ~~Broads, any housing development coming forward in the Broads part of the Borough is counted~~
153 ~~towards delivery against the Borough's needs. Through the Duty to Cooperate, Great Yarmouth~~
154 ~~Borough Council will deliver the residual 38 dwellings.~~

155 Depending on the outcome of the second call for sites, it may be that the Authority works with the
156 Districts in relation to meeting the outstanding need for housing in the Broads. It is important to
157 note that the need for the Broads is part of the need for the districts, and not additional to.

158 For Residential moorings

159 The following table shows the sites that are allocated for residential moorings. It shows a total of 53
160 residential moorings would be allocated. The need to be addressed in the Local Plan is 48
161 residential moorings.

<u>Site</u>	<u>Number of residential moorings</u>
<u>Brundall Gardens Marina – small marina</u>	<u>2</u>
<u>Brundall Gardens Marina – large marina</u>	<u>6</u>
<u>Greenway Marine, Chedgrave</u>	<u>5</u>
<u>Hipperson's Boatyard, Gillingham</u>	<u>5</u>
<u>Loddon Marina</u>	<u>10</u>
<u>Somerleyton Marina</u>	<u>15</u>
<u>Richardson's Boatyard, Stalham Staithe</u>	<u>10</u>
<u>Total:</u>	<u>53</u>

162 For Gypsy and Traveller sites:

163 <<**to be updated in next version of Local Plan. A call for sites for Gypsy and Traveller sites is being**
164 **held as part of the consultation on this version of the Local Plan**>>

165 **Affordable housing**

166 The provision of affordable housing is a key issue in local communities, particularly in rural areas
167 where sites appropriate for development may be limited or may fail to meet sustainability criteria.
168 In the Broads, this is exacerbated by the limited availability of land due to flood risk and the
169 demand for second/holiday homes that inflates land and property prices and is a disincentive for
170 the provision of lower cost housing.

171 The requirement for a percentage of properties within a development to be 'affordable' is an
172 established mechanism used by planning authorities to achieve provision of social housing (see
173 Developer Contributions section of the Local Plan). This mechanism, however, is not easily applied

174 within the Broads, as development is of a small-scale and is often individual properties, and larger
175 sites that trigger such a requirement come forward rarely. See Policy DM34 for more information.

176 Developers are encouraged to use Rural Housing Enablers to carry out Local Housing Needs Surveys
177 where affordable housing contributions for local need will be sought.

178 **Type**

179 Because the Broads Authority is not the Housing Authority for its planning area, it will work closely
180 with its districts who undertake this function to determine the type of housing that needs to be
181 delivered in a certain area.

182 **Project level HRA**

183 Project level Habitats Regulations Assessments (HRA) will need to consider implications for
184 European sites arising from their scheme, for example through increased recreation pressure.
185 There may be a need for adequate mitigation, such as adequate green infrastructure. HRAs should
186 be evidence based and draw on available information, such as the Norfolk wide visitor survey work
187 undertaken by Footprint Ecology⁵. Indeed, parts of Suffolk and all of Norfolk are required to
188 mitigate recreation impacts and that is most easily done through the relevant RAMS tariff schemes.
189 And development in parts of Norfolk need to mitigate for nutrient enrichment.

190 **Location of development**

191 The policy approach will be to prevent residential development beyond settlements other than in
192 exceptional circumstances, or which accords with the Authority's statutory purposes. Development
193 within settlements will be permitted only where it meets criteria covering issues such as flood risk,
194 satisfactory provision of infrastructure, and design.

195 If needed, the criteria used to assess settlements in the Settlement Study⁶ as well as that relating to
196 access to services and facilities in the Housing and Economic Land Availability Assessment (HELAA)⁷
197 will be used to determine sustainable patterns of development.

198 In most cases, settlements in the Broads straddle the Broads boundary, and the greater part of the
199 settlement lies within the neighbouring local planning authority's jurisdiction. Because of the
200 national protection afforded to the Broads and the vulnerability to flooding of most of the Broads
201 area (the boundary generally follows the edge of the flood plain), it will usually be the case that
202 both the greatest need and greatest opportunity for development in any settlement straddling the
203 boundary will be in that part of it outside the Broads.

204 The spatial strategy aims to ensure that communities across the Broads continue to thrive and are
205 economically resilient, environmentally sustainable, socially mixed and inclusive. The spatial
206 strategy is the overall framework for guiding development across the Broads, determining in what
207 general locations and settlements different kinds of development will be encouraged or restricted.
208 It offers the most sustainable way to accommodate housing in the Broads as:

- 209 • it makes the best use of previously developed land;

⁵ Norfolk Recreation Impact Study: www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base Evidence base (broads-authority.gov.uk)

⁶ Settlement Study: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0034/416599/Settlement-study-updated-Feb-2023.pdf

⁷ HELAA: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0023/491405/HELAA-September-2023.pdf

- 210 • it places new residents in close proximity to jobs, shops, leisure and cultural facilities and public
- 211 transport nodes to support sustainable lifestyles; and
- 212 • it regenerates some of the more run-down areas around the Broads.

213 **Five-year land supply on adoption of the Local Plan**
 214 [This will follow in the Submission version of the Local Plan.](#)

215 **Reasonable alternative options**

- 216 a) No policy
- 217 b) Original policy

218 **Sustainability appraisal summary**

219 The three options (of having a policy and not having a policy and the amended policy) have been
 220 assessed in the SA. The following is a summary.

A: Policy – Preferred Option	6 positives. 0 negatives. 0 ? Overall, positive.
B: No policy	0 positives. 0 negatives. 6 ?
C: Original policy	6 positives. 0 negatives. 0 ? Overall, positive.

221 **How has the existing policy been used since adoption in May 2019?**

222 According to recent Annual Monitoring Reports, the policy has been used and applications have
 223 generally been in conformity with it.

224 **Why have the alternative options been discounted?**

225 The policy needs updating to reflect the various different housing needs, the stepped trajectory and
 226 referring to nutrient enrichment and recreational impacts; these are factual updated. Other
 227 changes, like referring to the loss of homes and including more text on residential moorings and
 228 gypsy and travellers is prudent and preferred.

Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

		A: Amended policy	B: No policy	C: Original policy	
ENV1	+	Policy identifies where development is suitable, which seeks to minimise travel.	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty. It is also prudent to identify housing need that the plan seeks to address.	+	Policy identifies where development is suitable, which seeks to minimise travel.
ENV2					
ENV3	+	Policy refers to mitigating impacts relating to protected sites. Refers to nutrient enrichment and recreation impacts.		+	Policy refers to mitigating impacts relating to protected sites.
ENV4	+	Policy identifies where development is suitable.		+	Policy identifies where development is suitable.
ENV5					
ENV6					
ENV7	+	Policy highlights the use of previously developed land.		+	Policy highlights the use of previously developed land.
ENV8					
ENV9					
ENV10					
ENV11					
ENV12					
SOC1					
SOC2					
SOC3					
SOC4	+	Policy identifies the housing need for this Local Plan. Also seeks to address proposals for loss of housing.		+	Policy identifies the housing need for this Local Plan..
SOC5					
SOC6	+	Policy identifies where development is suitable, which seeks to minimise travel.	+	Policy identifies where development is suitable, which seeks to minimise travel.	
SOC7					
ECO1					
ECO2					
ECO3					

Planning Committee

02 February 2024

Agenda item number 15

Levelling Up and Regeneration Act

Report by Head of Planning

Summary

The Levelling Up and Regeneration Act has received Royal Assent. This report provides a summary of its provisions relating to planning. Secondary legislation and Regulations will be required to enact many of its provisions.

The National Planning Policy Framework (NPPF) which sets out the national planning policy was updated in December 2023. This report provides a summary of its main provisions.

Recommendation

To note the report.

1. Introduction

- 1.1. The [Levelling Up and Regeneration Act 2023 \(LURA\)](#) received Royal Assent on 26 October 2023, with its provisions coming into effect in 2024. The LURA is the mechanism by which many of the Government's manifesto commitments and policy objectives from The Environment Act 2021 and elsewhere are brought into force. Planning reform features heavily in the LURA and a summary of the main provisions relating to planning is set out below.
- 1.2. A report on the provisions of the LURA as relevant to the Broads Authority but excluding the planning elements was presented to the 26 January 2024 meeting of the Broads Authority: [The Levelling-Up and Regeneration Act 2023 and the Government response to the Landscape Review \(broads-authority.gov.uk\)](#).
- 1.3. The revised [National Planning Policy Framework \(NPPF\) \(gov.uk\)](#) was issued on 19 December 2023: [National Planning Policy Framework \(pdf | publishing.service.gov.uk\)](#)

2. The Levelling Up and Regeneration Act (LURA)

- 2.1. The LURA covers a broad range of issues including the levelling-up mission (Part 1), local democracy and devolution (Part 2), compulsory purchase (Part 9), information records relating to land, the environment and heritage (Part 11), as well as town and country planning (Part 3). The principal themes in the LURA relating to planning are around the need to speed up the planning system, hold developers to account, cut bureaucracy,

and encourage more councils to put in place plans to enable the building of new homes. Of the Act, Secretary of State for Levelling Up, Housing and Communities, Rt Hon Michael Gove MP said:

“Our landmark Levelling-Up and Regeneration Act will deliver more homes for communities across the country and unleash levelling up in left-behind places.

It will deliver revitalised high streets and town centres. A faster and less bureaucratic planning system with developers held to account. More beautiful homes built alongside GP surgeries, schools and transport links, and environmental enhancement.

Communities taking back control of their future with new powers to shape their local area. And our long-term levelling up missions enshrined in law.”

- 2.2. The main changes are set out below. It is worth noting that few of the provisions come into effect immediately, with the majority dependent on secondary legislation and further regulations.

Planning policy

- 2.3. The Government will introduce a suite of National Development Management Policies (NDMPs), which will be general policies that cover issues that apply in most areas. The example that is given is general heritage protection policies. In the drafting of the NDMPs, the policy makers are required to have regard to climate change and the need for mitigation and adaptation. The NDMPs will be subject to consultation in “all but exceptional circumstances” although they will not be subject to parliamentary approval. These NDMPs will have the same weight as policies in Local Plans and Local Plans must not duplicate them. Local Plans will be limited to locally specific matters only “such as allocating land for development, detailing required infrastructure and setting out principles of good design”.
- 2.4. Groups of authorities will also be able to produce voluntary spatial development strategies on specific cross-boundary issues, however the ‘duty to co-operate’ will be dropped, and time limits prescribed for different stages of plan preparation. The LURA has sought to make “several other changes to improve the process for preparing local plans: new powers will enable the introduction of ‘Gateway’ checks so that issues are identified earlier during plan preparation, and allow time periods to be prescribed for different parts of the plan preparation process, enabling delivery of a time-bound end-to-end process; digital powers in the Bill will allow use of more standardised and reusable data, and there will be a new requirement for local planning authorities to produce a consolidated policies map of the full development plan for their area, improving the clarity and transparency of plans; and the ‘duty to co-operate’ contained in existing legislation is being repealed”.
- 2.5. There will be a new power for planning authorities to create ‘supplementary plans’ for some or all of their areas where policies for specific sites or groups of sites need to be prepared quickly. The use of Supplementary Planning Documents (SPDs) will cease.

- 2.6. The Neighbourhood Plans process is to be simplified, with the introduction of “a new neighbourhood planning tool called a ‘neighbourhood priorities statement’, providing communities with a simpler and more accessible way to set out their key priorities and preferences for their local areas. Local authorities will need to take these into account, where relevant, when preparing their local plans for the areas concerned, enabling more communities to better engage in the local plan-making process.” Alongside this, the LURA will “prescribe in more detail what communities can address in their neighbourhood plans and amend the ‘basic conditions’ to ensure neighbourhood plans are aligned with wider changes to the planning system”.
- 2.7. All plan makers must take account of local nature recovery strategies in drawing up their documents.
- 2.8. There has been much media coverage of the proposed ‘street votes’ system, which will permit residents to propose development on their street and hold a vote on whether planning permission should be given. The original version of the draft legislation included “placeholder for a substantive clause which will introduce a ‘Street Votes’ system that permits residents to propose development on their street and hold a vote on whether it should be given planning permission”. This has been amended and replaced with “street vote development orders”, and related regulation-making powers covering the preparation and making of an order, including provision for independent examination and a referendum. This appears closer to the existing Neighbourhood Plans process. At the time of writing, Street Vote Orders approach was out for consultation; a proposed response will be presented to the March meeting of the Planning Committee.
- 2.9. Looking at funding, the LURA provides that the secretary of state can ask authorities to reimburse the government for local plan advice costs. It is not clear how this differs from the existing arrangement where the LPA pays the Planning Inspectorate for the cost of the Examination of its Local Plan.

Development management

- 2.10. The emphasis of the National Planning Policy Framework will shift to guiding plan-making and policies in the current National Planning Policy Framework (NPPF) that are intended to guide decision-making will be stripped out to form the basis of the promised National Development Management Policies that will take precedence over local plans as the primary policy guide for decision-making.
- 2.11. Decision-makers will face a new duty to act in line with the development plan and national policies and there will be “a new duty on decision-makers to make planning decisions in accordance with the development plan and national development management policies unless material considerations strongly indicate otherwise.” It is not clear how this differs from the existing presumption in favour of the development plan set out in the NPPF and the Act.

- 2.12. Planning application fees will be raised by more than one-third and it is stated that the government intends to increase planning fees for major and minor applications by 35% and 25% respectively. This increase in fees came into effect on 6 December 2023. Documents that accompany the LURA advise that powers are to be introduced “to bring forward powers to charge developers and promoters for statutory consultee advice in certain circumstances.”
- 2.13. A new Infrastructure Levy will replace section 106 planning obligations and the Community Infrastructure Levy (CIL). The rates and thresholds of this new levy will, as with the existing CIL regime, be set in charging schedules devised by the LPA, so that rates are tailored to local circumstances. The charging schedules must have regard to previous levels of affordable housing funded by developer contributions such that they are kept at a level that will exceed or maintain previous levels. All schedules will be subject to public examination. The LURA will also introduce a process to require developers to deliver some forms of infrastructure that are integral to the design and delivery of a site.
- 2.14. Powers to require developers to engage with communities pre-application will be made permanent. For decision-making, the Act will also enable pre-application engagement with communities to be required before a planning application is submitted, removing the sunset clause, making the powers that currently expire in 2025 permanent.
- 2.15. LPAs will have the power to decline to determine applications from applicants in cases where an earlier permission has not been implemented or the development has been carried out unreasonably slowly; this covers the whole of an LPAs area, not just a single site.
- 2.16. Finally, the existing performance framework for planning authorities will be expanded to measure performance across a broader range of quantitative and qualitative measures. There is also a commitment to develop a planning skills strategy for LPAs.

Heritage and design

- 2.17. There is a requirement under LURA for a Historic Environment Record (HER) to be maintained by a ‘relevant authority’ for its area. The Broads Authority is listed as a relevant authority for this purpose. Currently the HER for the Broads is maintained by the two County Councils under Service Level Agreements and this arrangement is likely to continue, albeit potentially with revised wording to meet the LURA requirements.
- 2.18. LPAs will be required to have a design code in place covering their entire areas. It is envisaged that these “area-wide codes will act as a framework, for which subsequent detailed design codes can come forward, prepared for specific areas or sites and led either by the local planning authority, neighbourhood planning groups or by developers as part of planning applications. This will help ensure good design is considered at all spatial scales, down to development sites and individual plots”.
- 2.19. Registered parks and gardens will get the same level of planning protection as listed buildings. Whilst, other designated heritage assets, such as World Heritage Sites,

protected wreck sites, and registered battlefields, will have the same statutory protection in the planning system as listed buildings and conservation areas.

Planning enforcement

2.20. The Act has introduced a number of changes which impact on planning enforcement, as follows:

Section	Provision	Notes
S.103	The introduction of a Listed Building Temporary Stop Notice (LBTSN)	The LBTSN can be in force for up to 56 days.
S.111	The introduction of 'Commencement Notices'	These introduce a mandatory requirement for the developer to give notice to the LPA, specifying when they propose to commence the work. The date can subsequently be varied if the work does not commence as proposed, but the failure to provide the LPA with the information on commencement when requested is an offence.
S.112	The introduction of 'Completion Notices'.	These may be used to require completion of a development which has commenced, but not been completed where the LPA are of the opinion that the development will not be completed within a reasonable time period. The 'Completion Notice' has the effect of cancelling the planning permission if the development is not completed by the time specified in 'the completion notice deadline'. There is a right of appeal.
S.113	Declining to determine applications	Introduces the power for LPAs to decline to determine applications in cases of earlier non-implementation or unreasonably slow build-out.
S.115	Changes to period of immunity from enforcement action	Immunity for enforcement action is currently acquired after four years for 'operational development' and ten years for 'material change of use'. The period is standardised to ten years for both types of breach.

Section	Provision	Notes
S.116	Increase in period for Temporary Stop Notice	Increased from 28 to 56 days.
S.117	The introduction of 'Enforcement Warning Notices' (EWN)	Issued by an LPA where it appears to them that there has been a breach of planning control and there is a reasonable prospect that retrospective permission would be granted. There is provision within the EWN process for enforcement action to be taken if no planning application is received and the service of an EWN stops the clock for immunity purposes.
S.118	Restrictions on appeals against Enforcement Notices (EN)	Where planning permission has already been refused and an appeal dismissed for the development alleged in the EN, the appellant cannot appeal against the EN on the grounds that planning permission should be granted (the "ground (a)" appeal).
S.119	Timely progress on appeals	Introduction of the power for the Secretary of State (i.e. the Planning Inspectorate) to dismiss appeals where it appears to them that the appellant is responsible for undue delays in the progress of the appeal.
S.120	Increase in penalties for non-compliance	Currently subject to a cost ceiling (level 3 on the standard scale), the limit has been removed for most types of breach.

2.21. These changes have not yet come into effect and will come into force on such day as the Secretary of State may by regulations appoint.

Other provisions

2.22. The LURA will confer a "power on the secretary of state to require or permit a person who takes part in certain proceedings relating to planning, development or the compulsory purchase of land to do so wholly or partly remotely" and it is expected that the Planning Inspectorate will be appointed for this purpose. This could apply to any inquiry, hearing, examination, meeting or other proceedings which relate to planning, development or the compulsory purchase of land, although it will not allow an LPA to hold only virtual committee meetings.

- 2.23. The EU processes of environmental impact assessment and strategic environmental assessment are replaced by ‘environmental outcomes reports’, which introduce an “outcomes-based approach that will allow the government to set clear and tangible environmental outcomes which a plan or project is assessed against”. This will “allow decision-makers and local communities to clearly see where a plan or project is meeting these outcomes and what steps are being taken to avoid and mitigate any harm to the environment. These outcomes will be set following consultation and parliamentary scrutiny but will, for the first time, allow the government to reflect its environmental priorities directly in the decision-making process.”
- 2.24. A council tax premium on second homes can be introduced. The Bill, and now the Act, introduces a “discretionary council tax premium on second homes and changes the qualifying period for use of the long term-empty homes premium”. The document accompanying the LURA states that “local authorities may levy a premium of up to an additional 100 per cent on council tax bills for second homes and for empty homes after one year (as opposed to two years which is the current requirement)”. The government will consult on exemptions to this, the notes add.
- 2.25. The legislation also makes provision for registration of short-term rental properties. These are defined in an amendment sets as (a) a dwelling, or part of a dwelling, which is provided by a person (‘the host’) to another person (‘the guest’) (i) for use by the guest as accommodation other than the guest’s only or principal residence, (ii) in return for payment (whether or not by the guest), and (iii) in the course of a trade or business carried on by the host, and (b) any dwelling or premises, or part of a dwelling or premises, not falling within paragraph (a) which is specified for the purposes of this paragraph”. The Secretary of State is required to undertake consultation before implementing this provision.
- 2.26. The Government had intended to include in the Act a relaxation of the nutrient neutrality rules, but this has not been included. It does, however, require the upgrading of some Water Treatment Works to best available technology by 2030.

3. National Planning Policy Framework

- 3.1. The revised National Planning Policy Framework (NPPF) was issued on 20 December 2023. The following is a summary of the main changes.
- 3.2. Housing is a key topic in the new document. There are changes to the methodology for calculating this to increase flexibility, with the outcome of the standard method being an advisory starting point only. The final assessment will be subject to Examination, in the usual way.
- 3.3. It also removes the requirement for LPAs to demonstrate a five-year housing land supply on an annual basis, where there is an up-to-date local plan that contained a deliverable five-year supply of land at Examination. It also removes the 5% and 10% buffers that could be applied to five-year housing land supply, and maintains the 20%

buffer only for those authorities that do not have an up-to-date plan in place and score below 85% on the Housing Delivery Test. A local plan is up-to-date if it is less than five years old and these changes create a strong incentive for LPAs to complete their local plans regularly.

- 3.4. For Neighbourhood Plans, it increases the level of protection from the presumption afforded by neighbourhood plans from two to five years post adoption, provided they identify at least one housing site.
- 3.5. There is also additional support given to the delivery of self-build, custom-build and community-led housing and encouragement for the delivery of older people's housing, including retirement housing, housing-with-care and care homes. There is also a new definition for a community-led exceptions site.
- 3.6. Looking at layout and design, it clarifies that whilst there is an emphasis in national policy on 'densification', there may be situations where higher densities would be out of character with the existing urban area and where significantly uplifting densities would be inappropriate. This assessment of character should be made and evidenced through a design code which is adopted or will be adopted as part of the local plan.
- 3.7. There are significantly increased references to design and greater emphasis on the role of beauty and placemaking in strategic policies, as well as providing greater support for energy efficiency measures through requiring decisions on planning applications to place significant weight on the need to support energy efficiency improvements to existing buildings.
- 3.8. Agricultural land is given greater protection through additional reference to the need to address food production, maintaining the emphasis on Best and Most Versatile (BMV) land.
- 3.9. The publication of the NPPF was also accompanied by a Written Ministerial Statement focusing largely on planning performance.

4. Conclusion

- 4.1. The introduction of the LURA and the changes to the NPPF are noted and the required measures will be incorporated into the working of the planning team as required.

Author: Cally Smith

Date of report: 18 January 2024

Background papers: LURA and NPPF.

Heritage Asset Review Group

Notes of the meeting held on 15 December 2023

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Present

Harry Blathwayt – in the Chair, Stephen Bolt, Mark Collins, Bill Dickson, Peter Dixon, Tim Jickells, Kevin Maguire, and Melanie Vigo di Gallidoro.

In attendance

Kayleigh Judson – Heritage Planning Officer, Kate Knights – Historic Environment Manager and Lorraine Taylor - Governance Officer.

1. Notes of HARG meeting held on 08 September 2023

The notes of the meeting held on 08 September 2023 were received. These had been submitted to the Planning Committee on 10 November 2023.

2. Historic Environment Team progress report

The Historic Environment Manager and the Heritage Planning Officer presented the report providing an update on progress with key items of work by the Historic Environment Team between the end of 09 September and 15 December 2023.

Conservation areas – update

The Historic Environment Manager (HEM) provided an update on the conservation area review and said the work had been started on the Neatishead Conservation Area (NCA) appraisal. The HEM explained that the area was partly in North Norfolk District Council and partly in the Broads Authority area. The area was first designated as a conservation area in 1975 and was last reviewed in 2011 and was therefore due to be updated.

The HEM went on to describe the architecture of the NCA. Buildings in the centre of Neatishead had been constructed with a limited palette of materials, including soft local red brick pantiles, occasional flint work and rendered buildings. In terms of the settlement pattern, it was close-knit with buildings often positioned directly onto the street. In addition, it was possible to see a Grade II listed wall which originally formed the entrance to the old stable block at Beeston Hall to the west of the village – itself a registered park and garden and partially within the NCA.

At the edge of the village, and the edge of the conservation area, a change of character could be seen. The development was more sporadic with a range of building types, including historic farmsteads, agricultural buildings and modern houses/bungalows.

Once the work on the NCA had been completed, a report would be drafted to be published in Spring 2024, and then go out to public consultation.

A Member asked whether a building close to the staithe in Neatishead was listed. The Heritage Planning Officer (HPO) checked some maps and confirmed that they did not think that the building was listed. The HEM confirmed that in the process of looking at that area in more detail, they would have a closer look at that building.

Listed buildings

The Historic Environment Manager (HEM) provided an update on the ongoing quinquennial survey of listed buildings. Since the last meeting, the Historic Environment Team (HET) had visited Horstead House close to Coltishall. The Grade II listed house had a number of outbuildings, many of which were included in the listing. In addition, a wall close to the house was also Grade II listed. The HPO said that the wall had some unusual features, including marks called skintlings from when the bricks were moulded which indicated that the wall predated 1780. The wall, however, was in poor condition in parts and some of the bricks were heavily spoiled. The HET had spoken to the owner and the advice was to adopt a low intervention approach in order to retain as much as possible of the historic fabric and its historic character.

The HET had also visited the St James' hospital chapel which was a Grade II* listed building and a Scheduled Ancient Monument, built in the 14th century and converted to a barn in the late 18th century. It was the last pilgrimage stop on the way to St Benet's Abbey and connected via a causeway. At the time of the last quinquennial survey, the chapel was in a poor condition, however following a grant from Historic England for repairs, it was in a good state.

The Heritage Planning Officer (HPO) provided an overview of the Grade II* listed Church of St Mary in Burgh St Peter. She pointed out the unusual design of the tower, rebuilt by Samuel Boycott in 1793 after the original had been destroyed. The church was in good condition generally, although there was a lean on the south wall, but it was thought that this was historic with no evidence of recent movement, and the thatched ridge would need to be replaced. Within the graveyard, there was a Grade II listed headstone made from limestone. At the bottom there was an inscription which was hidden by moss and lichen; therefore the HET would be contacting the diocese to recommend a specialist cleaning.

The redundant church of St Nicholas in Strumpshaw, managed by the Redundant Churches Trust, was in good condition, however there were some damp issues which need to be addressed, although there were signs of some damp investigation work having taken place. Within the graveyard there was a separately listed WW1 memorial which had some WW2 additions made to it. Apart from some slight lamination on the stonework, the memorial was in good condition.

In Mettingham there were three listed buildings. The first, a Grade II listed cottage which, although in good condition and well-looked after by the owner, needed its thatch replaced. The owner was finding it difficult to find funding for this work and the HET had recommended some possible funding streams.

The second was Benstead Farmhouse, a Grade II listed property which had a barn clad in modern timber and a corrugated iron roof. Once inside, it was possible to see that the barn was of a much older build with some plastering still visible between the timber frames and on the centre aisle section.

The third was the Grade II listed Mettingham House. A Georgian property which had permission for an extension a few years ago. Although the original planning application was objected by the Georgian Society the amended plan, which saw the reduction in size of the build, enabled the occupants to have a large extension which blended in well with the existing property.

A Member asked whether the brickwork on the upper storey of Mettingham House on the front elevation was an addition to the property due to the bricks looking slightly different to the rest of the property. The HPO said that it wasn't easy to tell, however, it did look like it could have been a slightly later addition.

The HEM provided an update on waterside chalets following a number of buildings having been put forward for listing. Historic England (HE) had continued their assessment and had visited all of the buildings. HE had sent some draft reports, however they did not include any recommendations. The HET hope that they would hear something shortly as to whether any of the applications had been successful.

Water, Mills and Marshes - update

The Historic Environment Manager (HEM) provided an update on the Water, Mills and Marshes (WWM) project. The project at Mutton's Mill was almost finished, however, the millwright had been unable to complete some of the work within the timescale that was

required. This meant that the WWM team had hired a cherry picker to reinstate the backstays on the sails. Three of the sails were completed, with one left to do which should be completed by Wednesday 20 December when the cherry picker was due to leave the site. Work still outstanding included redecoration on the sails, installation of new parts to the rollers, and some work on the brake. The HEM confirmed that the main lightening conductor had been installed as well as those on the sails.

The HEM reported that the WWM team had received two awards for their work on Muttons Mill at the Norfolk & Norwich Design and Craftsmanship Awards, run by the Norwich Society and the Norfolk Association of Architects.

At Strumpshaw, the work on the drainage structure had been completed. There were a few snagging jobs which would be completed in the Spring when the water levels would be lower.

A Member asked whether there would be an information panel installed to tell people what the structure was and what it did. The HEM confirmed that was the intention. The Member added that it would be good if a guide could be produced that would encourage people to visit these types of structures within the Broads, as well as those public buildings which were listed. Several of the Members present supported this approach, due to the historic nature of the architecture in the Broads area, right down to the type of bricks used in buildings and walls. The HEM said that this was something that could be looked at and suggested that she talk to the Head of Communications to see what could be done.

A Member asked whether the Broads Authority could publicise before and after photographs to show the work that had been carried out at Strumpshaw. The HEM said that this could also be looked into.

Historic Environment Record

The Historic Environment Manager (HEM) gave an overview on the Historic Environment Record (HER). HER was a depository or archive of information relating to the historic built environment and was a useful resource for both the public and professionals in managing the historic environment, and a useful tool to find out information on historic buildings and places. The Broads Authority had maintained a HER for many years, provided by Norfolk County Council through a service level agreement that the Authority paid for. Through the Norfolk Heritage Explorer website, information could be found on a number of places using keywords, site details, dates and maps.

As part of the Levelling Up and Regeneration Bill, it would become a statutory duty for all local planning authorities to keep a HER. The Authority was pleased about this as it would ensure that the status of the HER was properly recognised, retained and resourced into the future.

A Member asked whether the information about the Norfolk Heritage Explorer website could be placed in the next edition of the Broadcaster as they thought it would be a good resource for visitors.

St Benet's Abbey and Burgh Castle Fort

The Historic Environment Manager (HEM) provided an overview of the issues affecting both sites. The Norfolk Archaeological Trust (NAT) did a great job of looking after a number of historic sites throughout the county including St Benet's Abbey and Burgh Castle Fort which were within the Broads Authority's executive area.

The HEM had visited both sites with the director of the NAT and provided Members with images of the various structures. At St Benet's Abbey, she noted that the mill was unusual having been built within the gatehouse partially using the footings of that building.

St Benet's faced a number of problems, including anti-social behaviour through graffiti and damage from the public climbing on the buildings/remains. In addition, the fabric of the structure was being eroded due to the cattle that grazed around the Abbey rubbing against the walls. Although the Abbey was repaired frequently, there were signs of further erosion since the last repair one and a half years ago.

A further issue was the erosion of the riverbank. Historically there were Abbey buildings and outbuildings along the riverbank and despite flood defences being erected, the bank was continuing to erode. NAT were currently talking to Historic England (HE) and other bodies, as well as carrying out research, to enable them to get a project underway to get the area properly protected.

Burgh Castle was a good example of a Roman military installation that was built to defend the coast from Saxon invasion. Constructed in the 3rd century AD between 225 and 285, three of the four walls still survived. The scheduled area was much bigger than the fort itself. It included the remains of a civilian settlement below ground to the north, a Roman and Pagan cemetery to the east and the remains of an 11th/12th century mott and bailey castle constructed within the walls of the fort.

Although the site was owned by NAT, there was a management agreement in place with English Heritage who were responsible for its maintenance in terms of the historic fabric. The site was subject to a number of anti-social behaviour issues, such as dogs off leads disturbing ground-nesting birds despite signs asking owners to keep their dogs on leads at all times, people climbing the masonry and picking off pieces of flint or taking larger pieces and throwing them to the ground. Signs asking people to keep dogs on leads and not to climb were either removed or vandalised.

A Member commented that the new GI Rams scheme offered the potential of some funding to tackle this type of anti-social behaviour.

The HEM added that the wall at the southern end of the site was leaning dramatically for many years, however, after some social media interest Great Yarmouth Borough Council became concerned. Historic England did not think that it had moved recently and that the wall was supported by some pins inside the fabric. As a precaution, the wall was fenced off and the site was being monitored for at least a year to check whether it was starting to move again.

At the other end of the fort there were some very large cracks that ran all the way down and all the way through the masonry. In addition, there had been quite a lot of falling masonry, hence Heras fencing had been installed to keep the public away from it. The Broads Authority understood that repairs to this area were on Historic England's schedule of works for next year.

Potential Article 4 for thatched buildings

The Historic Environment Manager said that, following on from the last meeting, there had been more research undertaken. The team continued to log examples of unlisted thatched buildings within the Broads area and that they now had a database which enabled them to map all buildings.

The Nebb, Flixton, Suffolk

The Heritage Planning Officer (HPO) provided an overview of the Grade II listed building in Flixton. The listing was completed in 2020 by Historic England, originally one farmhouse which had been divided into two properties before being returned to one property. The owners applied for planning permission to do a number of internal and external alterations and install some solar panels in a natural clearing in a wooded area. During the application stage there had been some amendments made and the Authority was happy that the owners would retain the historic character of the property but brought it up to modern standards. The HPO said that they would visit the property in the New Year and provide an update at the next meeting.

The Chair thanked the Historic Environment Manager and the Heritage Planning Officer for their informative presentation.

3. Any other business

There was no other business.

4. Date of next meeting

The next HARG meeting would be held on Friday 08 March 2024.

The meeting ended at 11:04am

Signed by

Chair

Planning Committee

02 February 2024

Agenda item number 17

Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q4 (1 October to 31 December 2023)

Report by Planning Technical Support Officer

Summary

This report sets out the development control statistics for the quarter ending 31 December 2023.

Recommendation

To note the report.

1. Development control statistics

1.1. The development control statistics for the quarter ending are summarised in the tables below.

Table 1

Number of applications

Category	Number of applications
Total number of applications determined	41
Number of delegated decisions	37
Numbers granted	38
Number refused	3
Number of Enforcement Notices	0
Consultations received from Neighbouring Authorities	15

Table 2

Speed of decision

Speed of decision	Number	Percentage of applications
Under 8 weeks	21	51.2
8-13 weeks	0	0.0
13-16 weeks	0	0.0
16-26 weeks	0	0.0
26-52 weeks	0	0.0
Over 52 weeks	0	0.0
Within agreed extension	20	48.8
Outside of agreed extension	0	0.0

- 1.2. Extensions of time were agreed for 20 applications. Eighteen of these were required because further information was awaited, amendments had been made to the scheme, there had been other discussions which had taken it over time or because a re-consultation was underway. The remaining two were due to the applications being taken to Planning Committee.

Table 3

National performance indicators: BV 109 The percentage of planning applications determined in line with development control targets to determine planning applications.

National target	Actual
60% of Major applications ¹ in 13 weeks (or within agreed extension of time)	100%
65% of Minor applications ² in 8 weeks (or within agreed extension of time)	100%
80% of other applications ³ in 8 weeks (or within agreed extension of time)	100%

Author: Thomas Carter

Date of report: 15 January 2024

Appendix 1 – PS1 returns

Appendix 2 – PS2 returns

¹ Majors refers to any application for development where the site area is over 10,000m²

² Minor refers to any application for development where the site area is under 10,000m² (not including Household/ Listed Buildings/Changes of Use etc.)

³ Other refers to all other applications types

Appendix 1 – PS1 returns

Measure	Description	Number of applications
1.1	On hand at beginning of quarter	34
1.2	Received during quarter	48
1.3	Withdrawn, called in or turned away during quarter	1
1.4	On hand at end of quarter	40
2.	Number of planning applications determined during quarter	41
3.	Number of delegated decisions	37
4.	Number of statutory Environmental Statements received with planning applications	0
5.1	Number of deemed permissions granted by the authority under regulation 3 of the Town and Country Planning General Regulations 1992	0
5.2	Number of deemed permissions granted by the authority under regulation 4 of the Town and Country Planning General Regulations 1992	0
6.1	Number of determinations applications received	0
6.2	Number of decisions taken to intervene on determinations applications	0
7.1	Number of enforcement notices issued	0
7.2	Number of stop notices served	0
7.3	Number of temporary stop notices served	0
7.4	Number of planning contravention notices served	0
7.5	Number of breach of conditions notices served	0
7.6	Number of enforcement injunctions granted by High Court or County Court	0
7.7	Number of injunctive applications raised by High Court or County Court	0

Appendix 2 – PS2 returns

Table 1

Major applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	0	0	0	0	0	0	0	0	0	0
Offices/ Light Industry	0	0	0	0	0	0	0	0	0	0
General Industry/Storage/Warehousing	1	1	0	0	0	0	0	0	0	1
Retail Distribution and Servicing	0	0	0	0	0	0	0	0	0	0
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Large-Scale Major Developments	2	2	0	0	0	0	0	0	0	2
Total major applications	3	3	0	0	0	0	0	0	0	3

Table 2

Minor applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	2	1	1	0	0	0	0	0	0	2
Offices/Light Industry	0	0	0	0	0	0	0	0	0	0
General Industry/Storage/Warehousing	0	0	0	0	0	0	0	0	0	0
Retail Distribution and Servicing	1	1	0	0	0	0	0	0	0	1
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Minor Developments	11	11	0	5	0	0	0	0	0	6
Minor applications total	14	13	1	5	0	0	0	0	0	9

Table 3

Other applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Minerals	0	0	0	0	0	0	0	0	0	0
Change of Use	5	3	2	3	0	0	0	0	0	2
Householder Developments	17	17	0	11	0	0	0	0	0	6
Advertisements	0	0	0	0	0	0	0	0	0	0
Listed Building Consent to Alter/Extend	2	2	0	2	0	0	0	0	0	0
Listed Building Consent to Demolish	0	0	0	0	0	0	0	0	0	0
Certificates of Lawful Development ⁴	2	1	1	2	0	0	0	0	0	0
Notifications	1	1	0	1	0	0	0	0	0	0
Other applications total	27	24	3	19	0	0	0	0	0	8

⁴ Applications for Lawful Development Certificates are not counted in the statistics report for planning applications. As a result, these figures are not included in the total row in Table 4.

Table 4

Totals by application category

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Major applications	3	3	0	0	0	0	0	0	0	3
Minor applications total	14	13	1	5	0	0	0	0	0	9
Other applications total	24	22	2	16	0	0	0	0	0	8
TOTAL	41	38	3	21	0	0	0	0	0	20
Percentage (%)		92.7	2.3	51.2	0	0	0	0	0	48.8

Planning Committee

02 February 2024

Agenda item number 18

Appeals to the Secretary of State update

Report by Head of Planning

This report sets out the position regarding appeals against the Authority.

Recommendation

To note the report.

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2022/0023/UNAUP2 APP/E9505/C/22/3301919	Mr R Hollocks	Appeal received by the BA on 27 June 2022 Appeal start date 14 July 2022	Beauchamp Arms, Ferry Road, Carleton St Peter	Appeal against Enforcement Notice - lighting and kerbing	Committee Decision 27 May 2022 LPA statement submitted 25 August 2022

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2022/0021/UNAUP2 APP/E9505/C/22/3301976	Mr R Hollocks	Appeal received by the BA on 27 June 2022 Appeal start date 14 July 2022	Beauchamp Arms, Ferry Road, Carleton St Peter	Appeal against Enforcement Notice - workshop	Committee Decision 27 May 2022 LPA statement submitted 25 August 2022
BA/2021/0490/FUL APP/E9505/W/22/3303030	Mr N Mackmin	Appeal received by the BA on 13 July 2022 Appeal start date 2 December 2022	The Old Bridge Hotel Site, The Causeway, Repps with Bastwick	Appeal against refusal of planning permission: 8 one-bedroom & 4 two-bedroom flats for holiday use with restaurant & covered car-park at ground level.	Committee Decision 7 March 2022 LPA statement submitted 6 January 2023 Request from PINS to convert process to Hearing 15 January 2024
BA/2017/0006/UNAUP1 APP/E9505/C/22/3310960	Mr W Hollocks, Mr R Hollocks & Mr Mark Willingham	Appeal received by the BA on 11 November 2022 Appeal start date 16 November 2022	Loddon Marina, 12 Bridge Street Loddon	Appeal against enforcement notice- occupation of caravans	Committee decision 14 October 2022 LPA statement submitted 21 December 2022

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2023/0001/ENF APP/E9505/C/23/3316184	Mr R Hollocks & Mr J Render	Appeal received by the BA on 6 February 2023 Appeal start date 8 February 2023	Beauchamp Arms, Ferry Road, Carleton St Peter	Appeal against enforcement notice - occupation of caravans	Committee decision 9 December 2022 LPA Statement submitted 22 March 2023
BA/2022/0416/FUL APP/E9505/W/23/3321331	Mr Steve Hooper & Ms Mary Alexander	Appeal received by the BA on 2 May 2023 Appeal start date 24 October 2023	Blackwater Carr Land Off Ferry Lane, Postwick	Appeal against refusal of planning permission – Retrospective consent for the use of a yurt on a small, raised platform, securing a table and bench to the ground, the installation of a small staked and woven willow windbreak.	Committee Decision 3 February 2023 LPA Statement to be submitted by 28 November 2023
BA/2023/0004/UNAUP2 APP/E9505/C/23/3322890 and APP/E9505/C/23/3322949	Jeanette Southgate and Mr R Hollocks	Appeals received by the BA 24 and 26 May 2023 Appeal start dates 27 and 29 June 2023	Berney Arms Inn	Appeal against enforcement notice - occupation of caravan	Committee decision 31 March 2023 LPA Statements submitted 9 August and 11 August 2023

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2023/0012/HOUSEH APP/E9505/W/23/3326671	Mr M Anwar	Appeal received by the BA 26 July 2023 Appeal start date 23 October 2023	Broadswater House, Main Road, Ormesby St Michael	Appeal against refusal of planning permission – Single storey flat roof, side/rear extension. Timber fence to boundary. Erection of cart lodge.	Delegated decision 5 May 2023 Fast track householder appeal so no LPA Statement submitted.
BA/2023/0286/COND APP/E9505/W/23/3330719	Mr B Parks	Appeal received by the BA on 4 October 2023. Awaiting start date.	Shoals Cottage, The Shoal, Irstead	Appeal against non-determination of Planning application: Use pin tiles rather than thatch, variation of condition 2 of permission BA/2022/0030/HOUSEH	Appeal against non-determination (see linked appeal APP/E9505/D/22/3311 834)
BA/2023/0343/COND APP/E9505/W/23/3332687	Barnham Leisure Ltd	Appeal received by the BA on 7 November 2023 Awaiting start date.	Pampas Lodge Caravan Park, Haddiscoe.	Appeal against refusal of planning permission – Allow residential occupation of caravans, removal of condition 4 of permission BA/2022/0251/COND	Delegated decision 19 October 2023

Author: Cally Smith

Date of report: 18 January 2024

Background papers: BA appeal and application files

Planning Committee

02 February 2024

Agenda item number 19

Decisions made by officers under delegated powers

Report by Senior Planning Officer

Summary

This report sets out the delegated decisions made by officers on planning applications from 18 December 2023 to 19 January 2024 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

Parish	Application	Site	Applicant	Proposal	Decision
Dilham Parish Council	BA/2023/0439/COND	Land North Of Tonnage Bridge Cottage Oak Road Dilham Norfolk NR28 9PW	Mr Luke Paterson	Replace pods with alternative design, variation of condition 2 of permission BA/2017/0392/FUL	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Fleggburgh Parish Council	BA/2023/0449/AGR	Land Adjacent To West View Marsh Road Fleggburgh Norfolk NR29 3DE	Mr D Howes	Grain store and machinery store	Prior Approval not Required
Fleggburgh Parish Council	BA/2023/0407/HOUSEH	Marshlands Main Road Billockby Fleggburgh Norfolk NR29 3BG	Mr & Mrs Beaumont	Replacement garden store	Approve Subject to Conditions
Gillingham Parish Council	BA/2023/0373/CLEUD	Land At Gillingham, Beccles Beccles	Mr James Cook	Lawful Development Certificate for 10 years mooring use	CLUED Not Issued
Halvergate Parish Council	BA/2023/0434/HOUSEH	Mill Reach Farm Acle New Road Halvergate Norfolk NR13 3QE	Mr & Mrs O'Farrell	Installation of opening doors with catslide dormer & juliet balcony	Approve Subject to Conditions
Horning Parish Council	BA/2023/0387/FUL	4 Grebe Island, Willow Lodge Lower Street Horning Norfolk NR12 8PF	Penny Brown	Replacement quay-heading	Approve Subject to Conditions
Horning Parish Council	BA/2023/0385/FUL	New Inn 54 Lower Street Horning Norfolk NR12 8PF	The New Inn	Replace 87m of quay-heading	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Horning Parish Council	BA/2023/0318/HOUSEH	Willow Lodge Ferry Cott Lane Horning Norfolk NR12 8PP	Mr Ian Woodhead	Replace 34m of quay heading and decking retrospective.	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2023/0410/HOUSEH	Mayfield Broadview Road Lowestoft Suffolk NR32 3PL	Lockhart	First floor extension to roof space, alterations to entrance & dormer windows	Approve Subject to Conditions
Repps With Bastwick Parish Council	BA/2023/0408/FUL	Nippy Chippy & Amusements Bridge Road Potter Heigham NR29 5JQ	Mr J Stone	Change of use of amusements part of building to create 3 commercial units (Class E). Use of loft as storage area and provision of internal stairs. Installation of 3 x rooflights. Installation of solar panels.	Approve Subject to Conditions
Stokesby With Herringby Parish Council	BA/2023/0457/LBC	Martin Staithe The Green Mill Road (track) Stokesby With Herringby Norfolk NR29 3EX	Mr & Mrs Bunning	Replacement garden room with loggia and insert pedestrian access gate in existing internal garden wall.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Stokesby With Herringby Parish Council	BA/2023/0456/HOUSEH	Martin Staithe The Green Mill Road (track) Stokesby With Herringby Norfolk NR29 3EX	Mr & Mrs Bunning	Replacement garden room with loggia and insert pedestrian access gate in existing internal garden wall.	Approve Subject to Conditions
Wroxham Parish Council	BA/2023/0425/HOUSEH	Bryn House Beech Road Wroxham Norfolk NR12 8TP	Mr Paul Rose	New timber quay heading inc. new cappings & walings	Approve Subject to Conditions

Tree Preservation Orders confirmed by officers under delegated powers

Parish	Address	Reference number	Description
N/A	N/A	N/A	N/A

Author: Cally Smith

Date of report: 22 January 2024