

Planning Committee

Agenda 3 July 2026

10.00am

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

Emma Krelle, Interim Chief Executive – Friday 26 June 2026

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 (see [Appendix 1](#) to the Agenda for guidance on your participation having declared an interest in the relevant agenda item)
3. **To receive and confirm the minutes of the Planning Committee meeting held on 8 May 2026** (Pages 4-10)
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 update** (Pages 11-13)
Report by Development Manager

Governance

9. **Scheme of powers delegated to Chief Executive and other authorised officers – update to section 2(e) Planning and heritage** (Pages 14-19)
Report by Head of Governance

Policy

10. **Greater Norwich Green Infrastructure Strategy SPD - endorsement** (Pages 20-21)
Report by Planning Policy Officer
11. **Strumpshaw Neighbourhood Plan - adoption** (Pages 22-23)
Report by Planning Policy Officer
12. **Norwich City Council's Affordable Housing SPD - endorsement** (Pages 24-25)
Report by Planning Policy Officer

Matters for information

13. **Consultation responses** (Pages 26-48)
Report by Planning Policy Officer
14. **Customer satisfaction survey 2026** (Pages 49-55)
Report by Planning Technical Support Officer
15. **Appeals to the Secretary of State update** (Pages 56-57)
Report by Development Manager
16. **Decisions made by Officers under delegated powers** (Pages 58-65)
Report by Development Manager

Other matters

17. Other items of business
Items of business which the chairman decides should be considered as a matter of urgency pursuant to Section 100B (4)(b) of the Local Government Act 1972
18. **To note the date of the next meeting – Friday 7 August 2026 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](#)

Appendix 1 – Extract from the Local Government Association Model Councillor Code of Conduct



Planning Committee

Minutes of the meeting held on 8 May 2026

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Present

Tim Jickells – in the Chair, Harry Blathwayt, Andrée Gee, Tony Grayling, James Harvey and Matthew Shardlow

In attendance

Jason Brewster – Governance Officer, Jane Fox – Planning Officer (item 7.1), Steve Kenny – Development Manager, Kate Knights– Heritage and Design Manager (item 9) and Lorraine Taylor – Head of Governance

Members of the public in attendance who spoke

Alistair Paterson (applicant) for item 7(1) - Land To The West Of Church Loke, Coltishall.

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

Apologies were received from Stephen Bolt, Martyn Hooton, Gurpreet Padda, James Reeder, 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 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 10 April 2026 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

The Chair stated that public speaking was in operation in accordance with the Authority's Code of Practice for members of the Planning Committee and officers. Those who wished to

speakers were invited to come to the Public Speaking desk when the application they wished to comment on was being presented.

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

The Committee considered the following applications submitted under the Town and Country Planning Act 1990 (also having regard to Human Rights), and reached the decisions set out below. Acting under its delegated powers, the Committee authorised the immediate implementation of the decisions.

The following minutes relate to additional matters of information or detailed matters of policy not already covered in the officer's report, which were given additional attention.

(1) BA/2025/0096/FUL Land To The West Of Church Loke, Coltishall

Construction of 1 x Self-build Dwelling and 2 x Market Housing Dwellings

Applicant: A. Paterson

The Planning Officer (PO) provided a detailed presentation of the application for the development of two market housing dwellings and one self-build dwelling on land, accessed from Church Loke, adjacent to the southern edge of the Coltishall Development Boundary.

The presentation included a location map with nearby listed buildings marked, an aerial image of the site relative to the Broads Authority Executive Area, the Coltishall Settlement Boundary and the River Bure, a map of the entire Coltishall Settlement Boundary, as defined in the Greater Norwich Local Plan, with the site and two recent approved sites (one within and one adjacent to this boundary) marked, a site map with local facilities marked, an existing site layout, an aerial photograph of the site, various photographs of the approach to the site from Church Street along Church Loke, various photographs of the site, a proposed site layout and landscaping plan, artist impressions of the three plots, diagrams of the proposed elevations and floor plans for plot 1 and an indicative list of proposed materials.

In assessing the application, the PO addressed the key issues of: the principle of development, impact on the landscape including heritage assets, the design of the new buildings and the impacts on the Conservation Area, ecology, trees, neighbour amenity, highways, Nutrient Neutrality and Green Infrastructure and Recreational disturbance Avoidance and Mitigation Strategy, Biodiversity Net Gain and the impacts of climate change.

In response to a question the PO confirmed that the historic refusal referred to by the Parish Council was a different site on Church Loke. This development related to a change from commercial to residential use which was refused as the marketing criteria, required to confirm that commercial use was no longer viable, had not been fulfilled. This decision was appealed, the appeal was dismissed by the Planning Inspectorate and a subsequent revised application was refused for the same reason.

A Member noted that this site's location was not consistent with the current Local Plan for the Broads and asked whether this was also true for the emerging Local Plan for the Broads. The Development Manager (DM) confirmed that this was the case although, given that the site conformed with the Housing and Economic Land Availability Assessment criteria, if it had been submitted for consideration during a call for sites it would have been recommended to be allocated in the Local Plan.

A Member asked whether the development would increase the risk of surface water flooding. The PO indicated that the development included sustainable drainage and water harvesting although detailed plans, which could be conditioned, were yet to be provided. These systems, plus the location of the site on the ridge of the river valley, would provide some form of mitigation.

A Member asked for more detail regarding the relocation of trees and whether this relocation was necessary. The PO confirmed that the impacted trees would be extracted and moved and that the development had attempted to incorporate the existing green features where possible. The Authority's Tree Consultant had reviewed the supplied Arboricultural Method Statement and had no objection to the development.

Mr Paterson, the applicant, stated that any new development within Coltishall would fall outside the development area as its boundary followed the gardens within the village with the exception of the scrapyards located in the centre of the village. Mr Paterson believed the development's design was sympathetic to the Conservation Area and was in character with the vibrant culture of Coltishall.

A Member asked whether the concern raised in an objection, regarding relocated trees impacting existing trees on the site boundary, was legitimate. Mr Paterson responded that the root protection zones of existing trees had been plotted and that the relocated trees would not be planted within those zones.

A Member was concerned that these dwellings would be used for holiday lets. Mr Paterson explained that there was no vacant space, above the garages for example, to create additional accommodation within the proposed dwellings.

A Member believed the Biodiversity Net Gain (BNG) assessment had mistakenly excluded the self-build dwelling. The Member believed the BNG regulations permitted the exemption of self-build dwellings when the development consisted exclusively of dwellings that were self-build. The DM agreed to confirm the BNG assessment with the Authority's BNG Consultant to ensure it was consistent with the relevant regulations.

Members supported the application with a Member characterising the development, given its location, as a natural evolution of the village.

Matthew Shardlow proposed, James Harvey seconded

It was resolved unanimously to delegate approval of BA/2025/0096/FUL to the Head of Planning, subject to BNG confirmation, the completion of a S106 agreement and the following conditions:

- i. Time limit
- ii. In accordance with approved plans and documents
- iii. *Prior to commencement - Landscaping plan
- iv. *Prior to commencement - Trees – Detailed Arboricultural Method Statement
- v. Bats – soft demolition of small shed on site.
- vi. Bat (2) Night Lighting – none in woodland area
- vii. Bats (3) Prior to installation – lighting plan
- viii. Birds – removal of woody vegetation time of year to be specified
- ix. Precautionary working method – reptiles/amphibians.
- x. Bird boxes – one per new dwelling minimum
- xi. Bat boxes – one per new dwelling minimum
- xii. Bat boxes (2) – two on existing mature trees along the northern boundary or other mature trees in suitable locations.
- xiii. Highways - Prior to occupation - Access, on-site car parking and turning arrangement.
- xiv. *Pre-commencement – Biodiversity Net Gain
- xv. *Pre-commencement - SuDs/water harvesting details
- xvi. Prior to installation – Air Source Heat Pumps
- xvii. Prior to occupation – Pumping station details
- xviii. Nutrient Neutrality – in accordance with S106
- xix. Self-build – in accordance with S106
- xx. Construction times
- xxi. Water usage 110 litres per head per day

8. Enforcement update

Members received an update report from the Development Manager (DM) on enforcement matters previously referred to the Committee. Further updates were provided at the meeting for:

Land on the West Side of River Waveney, Beccles - Unauthorised development without planning permission

The wooden decking boards and posts had been removed from the site in compliance with the Enforcement Notice (EN). The DM confirmed that the EN would not be removed to expediate any further action relating to unauthorised development at this site.

Land on the South-West Side of Norwich Road, Gillingham, Beccles - Unauthorised fence and development of mooring plot

An extension to the compliance period had been granted due to the extenuating circumstances of the landowner. The revised compliance period had subsequently expired and the site had not been cleared. The landowner had been informed that the Authority would consider direct action to clear the site.

9. Broads Authority Landscape Character Assessment Supplementary Planning Document

The Heritage and Design Manager (HDM) introduced the report, which detailed updates to the Landscape Character Assessment (LCA) and its categorisation as a Supplementary Planning Document (SPD). The LCA was intended to inform development proposals and planning decisions in order that the special landscape qualities of the Boards were protected.

The HDM explained that the first version of the LCA was introduced in 2006 and this iteration was the first major update since 2016. The changes focused on improvements to the accessibility of the LCA, the previous version contained multiple images with embedded captions and low contrast text both of which failed to meet accessibility standards. The document had also been simplified and brought up-to-date with aerial mapping of each landscape character area.

Two public consultations had been undertaken for the revised LCA: The first consultation had elicited 14 representations, with a further two representations received on the second occasion. The representations had been considered and amendments made to the document where necessary.

It was intended that the LCA should be designated an SPD to provide extra weight in planning decisions and for inclusion as supporting evidence for the emerging Local Plan for the Broads. The HDM confirmed that, under the Levelling-up and Regeneration Act 2023, SPDs were being phased out and the Authority would include the LCA in the resulting transition.

Andree Gee proposed, seconded by Harry Blathwayt

It was resolved unanimously to endorse the Landscape Character Assessment Supplementary Planning Document and recommend it for approval by the Broads Authority.

10. Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q1 (1 January to 31 March) 2026)

The Development Manager (DM) introduced the report, which provided the development management statistics for the quarter ending 31 March 2026. The DM highlighted that all minor and other applications had been determined within statutory timescales or within an agreed extension of time as shown in table 2 (of the report) and exceeded the national performance indicators as shown in table 3 (of the report).

The report was noted.

11. Decisions on Appeals by the Secretary of State between 1 April 2025 and 31 March 2026 and monthly update

The Committee received a schedule of decisions on appeals made by the Secretary of State between 1 April 2025 and 31 March 2026; 10 decisions had been received during this period of which seven were dismissed and three were allowed.

Since the last committee meeting one decision had been received regarding replacing 440m of timber quay-heading with interlocking plastic piling & timber capping at the Pleasure Boat Inn, Staithe Road, Hickling. The Planning Inspector had allowed the appeal and provided a thorough assessment of their reasoning for this decision. The DM did not believe this decision set a precedent for the general use of plastic piling as its use in this instance was caveated by the use of double whaling boards and the existing urbanisation surrounding this site.

A Member noted, following the appeal decision at Plot K, Bureside Estate, Crabbetts Marsh, that this was the second decision allowing plastic piling to be used. The DM explained that the previous decision was more limited in scale and the assessment was less detailed. The latest decision had referenced the emerging Local Plan which provided greater flexibility regarding appropriate materials via a criteria based assessment.

12. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 25 March to 22 April 2026 and any Tree Preservation Orders confirmed within this period.

13. Other items of business

There were no other items of business.

14. Date of next meeting

Since the meeting, it had been agreed to cancel the meeting scheduled for 5 June 2026. The next meeting of the Planning Committee would be on Friday 3 July 2026 at 10:00am at The King's Centre, 63-75 King Street, Norwich.

The meeting ended at 11:05am.

Signed by

Chair

Planning Committee

3 July 2026

Agenda item number 8

Enforcement update

Report by Development Manager

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 & Case number	Location	Infringement	Action taken and current situation [date of update]
14 September 2018 BA/2018/0047/ UNAUP3	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravans (Units X and Y)	- For previous history please refer to Enforcement update, Planning Committee 8 May 2026 Statics X & Y have been removed entirely from site, notice is complied with [22/06/2026].

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
21 September 2022 BA/2017/0006/ UNAUP1	Land at Loddon Marina, Bridge Street, Loddon	Unauthorised static caravans	- For previous history please refer to Enforcement update, Planning Committee 8 May 2026 One static removed, remaining one is being used only in association with running of the campsite and marina. This is considered acceptable, presents no additional harm and as such is not expedient to pursue further [22/06/2026].
9 December 2022 BA/2018/0047/ UNAUP3	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravan (Unit Z)	- For previous history please refer to Enforcement update, Planning Committee 8 May 2026 Static Z has been removed entirely from site, notice is complied with [22/06/2026].
31 March 2023 BA/2023/0004/ UNAUP2	Land at the Berney Arms, Reedham	Unauthorised residential use of caravans and outbuilding	- 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. - Appeal submitted against Enforcement Notice [25/05/2023]. - Appeals dismissed and notice upheld with variations [22/04/2025]. - This site will be discussed further with the owner, once the proposed action at the other sites is taken.
2 February 2024 BA/2022/0007/ UNAUP2	Holly Lodge, Church Loke, Coltishall	Unauthorised replacement windows in listed building	- Authority given to serve a Listed Building Enforcement Notice requiring the removal and replacement of the windows and the removal of the shutter. Compliance period of 15 years - LPA in discussions with agent for landowner [10/04/2024]. - No resolution achieved through discussion. Legal advice sought [29/08/2024]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			• Case review – Listed Building Enforcement Notice to be served, in process of content being considered and drafted. • Listed Building Enforcement Notice served by hand on Friday 24th January. • Appeal submitted and valid – start date 19/03/2025. Will be dealt with by compliance officer [21/03/2025]. • PINS contacted about delay, await response [19/11/2025]. • PINS confirmed no case officers available [25/11/2025]. • PINS Site visit carried out Tuesday 16th June, approx. 2 weeks for decision [22/06/2026].
12 December 2025 BA/2024/0045/ UNAUP4	Land on the South-West Side of Norwich Road, Gillingham, Beccles	Unauthorised fence and development of mooring plot	• Authority given to serve an Enforcement Notice requiring removal from the site all wooden boarding from the floor area including the raised stepped seating area to the rear of the plot, leaving a walkway with a width of no more than 2 meters from the edge of the quay heading. • Enforcement Notice served 12 December 2025 - compliance period 3 months [26/01/2026]. • Works have not been completed, owner warned of possible direct action. [12/04/2026]

Author: Steve Kenny

Date of report: 22 June 2026

Background papers: Enforcement files

Planning Committee

3 July 2026

Agenda item number 9

Scheme of powers delegated to Chief Executive and other authorised officers – update to section 2(e) Planning and heritage

Report by Head of Governance

Summary

To consider and agree proposed changes to the Scheme of powers delegated to the Chief Executive and other authorised officers and for the Planning Committee.

Recommendation

- i. To recommend to the Broads Authority that they approve the revised Scheme of powers delegated to the Chief Executive and other authorised officers in relation to the Planning Committee as set out in paragraphs 2.3, 3.2, 3.5 and 4.2 of the report.
- ii. To recommend to the Broads Authority that 4.1 of the Code of Practice for members of the Planning Committee and officers be updated to reflect the proposed change in clause 37 of the Scheme of powers delegated to the Chief Executive and other authorised officers.

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1. Introduction

- 1.1. The Scheme of powers delegated to the Chief Executive and other authorised officers, commonly referred to as the Scheme of Delegation (SoD), is an important part of the Authority's constitutional documents. The purpose of the SoD is to ensure that officers have the powers to make decisions and take appropriate action in a timely and efficient manner within the adopted guidelines.
- 1.2. The SoD was last reviewed and adopted by Members in September 2023. Since that date, exercising his delegated power under section 5.10 of the SoD, the Chief Executive made a very minor change In September 2024 to reflect the change in the job title of Senior Planning Officer to Development Manager. In [January 2025](#) changes to the SoD in relation to Planning Enforcement Powers, the Neighbourhood Planning approval process, and signing of Section 106 Agreements not associated with a planning application were approved by the Board. There have been no other changes.
- 1.3. Three changes are now required to section 2(e) Planning and heritage of the adopted SoD to either reflect revised powers, introduce new powers or clarify the existing wording affecting a number of sections. These have been incorporated into one report.
- 1.4. Extensive research has been conducted prior to drafting the proposed changes. This included looking at National Park Authorities (NPAs) Schemes of Delegation to clarify their handling of planning applications submitted by them or on their behalf, whether consultations on planning matters were delegated, and how planning enforcement was delegated. In addition, the proposed changes have been discussed in detail with the Head of Planning.
- 1.5. The proposed revisions are set out in detail in sections 2, 3 and 4 below.

2. Planning applications submitted by the Broads Authority

- 2.1. The SoD does not explicitly reference planning applications submitted by the Broads Authority. At present these are brought to Planning Committee via clause (37) (viii) which states:

the Director of Delivery considers the matter ought more appropriately to be referred to the Planning Committee for a decision;
- 2.2. Within Section 4 of the Authority's Code of Practice for members of the Planning Committee and officers, it references the use of 'Director's discretion' in the context of applications submitted by the Authority.
- 2.3. The use of Director's discretion (37 viii) provides a useful back stop for unforeseen situations where an application, for example, may cause the Authority reputational harm if treated as a delegated decision, however, it is proposed to add a further item (x) to clause 37 to provide clarity that **all** applications submitted by or on behalf of the Authority for its own development, or for development on Authority owned land will be determined by the Planning Committee.

2.4. Below is an extract from the SoD with the proposed changes (in **bold text**):

Powers delegated to Chief Executive	Other authorised officers
(37) All planning applications are considered to fall within the delegation scheme and will be determined by officers, unless: (i) it is for a major development as defined in Town and Country Planning (Development Management Procedure) (England) Order 2015; (ii) the application represents a departure from the development plan policies, including the Broads Local Plan and any relevant policy adopted by the Authority, and it is proposed to grant planning permission; (iii) objections are received from any statutory consultee (excluding parish councils) in respect of any proposed development within the 21-day period for consultation, and it is proposed to grant planning permission; (iv) representations are received in writing from parish councils in respect of any proposed development within the 21-day period for consultation where these raise material planning considerations of significant weight; (v) representations are received in writing from other persons in respect of any proposed development within the 21-day period for consultation where these raise material planning considerations of significant weight; (vi) any member of the Authority requests, within 21 days of receipt of the schedule of planning applications, that the application is placed before the Planning Committee for a decision, and provides material planning considerations of significant weight in writing; (vii) the ward member of the relevant District Council requests, within 21 days of receipt of the schedule of planning applications, that the application is placed before the Planning Committee for a decision, and provides material planning considerations of significant weight in writing;	Director of Delivery or Head of Planning or Development Manager

Powers delegated to Chief Executive	Other authorised officers
(viii) the Director of Delivery considers the matter ought more appropriately to be referred to the Planning Committee for a decision; (ix) any Authority member (including co-opted members of the Navigation Committee) or Authority officer is involved in the application; (x) applications submitted by or on behalf of the Authority for its own development, or for development on Authority owned land.	

- 2.5. This proposed change to the SoD will require a change to 4.1 of the Code of Practice for members of the Planning Committee and officers to reflect that the Scheme of Delegation clause 37 will require development proposals by the Broads Authority to be referred to the Planning Committee.

3. Committee decisions when responding to consultations

- 3.1. The Vice-Chair of the Planning Committee asked whether the Broads Authority would consider further streamlining the process for responding to consultations that came to the Planning Committee by delegating more responses to consultations to officers. It was noted that there should be exceptions, such as government consultations on new national Planning Policy when the Broads Authority has an interest and would want to influence the outcome.

- 3.2. Following discussion with the Head of Governance and the Planning Policy Officer, the proposed wording is suggested below:

Powers delegated to Chief Executive	Other authorised officers
(67) To respond to consultations on planning matters from the Government and other agencies, subject to consideration by the Planning Committee of those documents that have serious implications for the Broads.	Director of Delivery or Head of Planning or Planning Policy Officer

- 3.3. To ensure transparency regarding delegated consultations in a similar fashion to the Delegated Decisions report presented to each Planning Committee meeting, a quarterly written report will be presented to the Planning Committee meeting for noting under 'Matters for Information' which will detail any Planning responses issued.
- 3.4. If the new clause 67 is approved, it is proposed to enhance clause 66 to enable delegation for responses to consultations on Regulation 14 and 16 versions of

Neighbourhood Plans, unless they have serious implications for the Broads. The Planning Policy Officer has advised that Regulation 16 versions of Neighbourhood Plans only need to go to committee when an objection is to be made.

3.5. Below is an extract from the SoD with the proposed changes to clause 66 (in **bold text**):

Powers delegated to Chief Executive	Other authorised officers
(66) To (i) agree a Neighbourhood Area; (ii) approve a Neighbourhood Plan for consultation under Regulation 16 and (iii) Approve a Neighbourhood Plan to go to referendum. (iv) To respond to consultations on Regulation 14 version Neighbourhood Plans, subject to consideration by the Planning Committee of those documents that have serious implications for the Broads. (v) To respond to consultations on Regulation 16 version Neighbourhood Plans, subject to consideration by the Planning Committee when objection(s) are to be made.	Director of Delivery or Head of Planning

4. Planning Enforcement

4.1. The Head of Planning and Development Manager have requested that further exceptions to clause 47 of the SoD are included for clarification in certain circumstances where it would be prudent to discuss with the Planning Committee before any action is taken.

4.2. Below is an extract from the SoD with the proposed changes (in **bold text**):

Powers delegated to Chief Executive	Other authorised officers
(47) The determination of enforcement cases is considered to fall within the delegation scheme and will be undertaken by officers, unless: (i) any Authority member (including co-opted members of the Navigation Committee) or Authority officer is involved in a material breach of planning control. (ii) enforcement would require prosecution or direct action that may expose the Authority to significant financial or reputational risk.	Director of Delivery or Head of Planning or Development Manager

Powers delegated to Chief Executive	Other authorised officers
(iii) the Director of Delivery considers that the case should be referred to the Planning Committee for decision.	

5. Risk implications

- 5.1. The Authority and its decisions could be at risk of challenge, including judicial review, if its scheme of delegation is not reviewed and updated on a regular basis to ensure officers are properly authorised to carry out certain powers

6. Conclusion

- 6.1. Members are asked to recommend to the Broads Authority that they adopt the amendments and additions as set out in paragraphs 2.3, 3.2, 3.5 and 4.2.

Author: Lorraine Taylor

Date of report: 5 June 2026

[Broads Plan](#) strategic objectives: n/a

Planning Committee

3 July 2026

Agenda item number 10

Greater Norwich Green Infrastructure Strategy

SPD- endorsement

Report by Planning Policy Officer

Summary

The Greater Norwich Authorities have adopted a Green Infrastructure (GI) Supplementary Planning Document (SPD) which aims to support the delivery of high-quality, multifunctional green infrastructure. The text and maps include areas of the Broads Authority.

Recommendation

That Planning Committee endorse the Greater Norwich Implementation of the Greater Norwich Green Infrastructure Strategy Supplementary Planning Document and recommend that Broads Authority do the same.

1. Introduction

- 1.1. This supplementary planning document (SPD) aims to support the delivery of high-quality, multifunctional green infrastructure (GI). It provides guidance for developers, planners and communities on how to use the Greater Norwich Green Infrastructure Strategy to implement Greater Norwich Local Plan policies 2, 3, 4, 6 and 7.
- 1.2. The GI Strategy document (and its associated supporting documents/appendices) is the evidence base commissioned by the Greater Norwich authorities, subject to its own stakeholder engagement, finalisation and endorsement process. The SPD is the text setting out how the evidence base should be used in the determination of planning applications. The SPD was titled “The Implementation of...” purposefully to indicate that the SPD is about how to implement the existing and endorsed GI Strategy evidence base as part of the determination of planning applications, and this is also expanded on in paragraph 1.4 of the SPD.
- 1.3. While the SPD only applies to the Greater Norwich planning area, the GI Strategy covers to some degree the entire administrative areas of the Greater Norwich Authorities, including the Broads. The GI Strategy is appended to the SPD.
- 1.4. What this means in practice is that the GI Strategy could be considered as part of any relevant planning applications. The current Local Plan and emerging Local Plan do have policies relating to Green Infrastructure.

1.5. The links to the documents are as follows:

- [Adopted Implementation of the Greater Norwich Green Infrastructure SPD](#)
- [GNGIS SPD Adoption Statement](#)
- [GNGIS SPD Consultation Report](#)
- [GNGIS SPD Strategic Environmental Assessment \(SEA\) Screening Report](#)
- [GNGIS Equalities Impact Assessment](#)

Author: Natalie Beal

Date of report: 28 May 2026

Planning Committee

3 July 2026

Agenda item number 11

Strumpshaw Neighbourhood Plan- adoption

Report by Planning Policy Officer

Purpose

The reviewed Strumpshaw Neighbourhood Plan has been examined. The Examiner made some changes to the Plan. The Plan was subject to a referendum on 7 May 2026.

Recommended decision

That Planning Committee endorse Strumpshaw Neighbourhood Plan for being made/adopted by the Broads Authority and recommend that the Broads Authority make/adopt the Strumpshaw Neighbourhood Plan.

1. Introduction

- 1.1. The submitted Strumpshaw Neighbourhood Plan was approved by the Broads Authority's Head of Planning/Director of Delivery in May 2025. This was followed by a statutory publication period between 9.00am on Wednesday 13 August and 5.00pm on Friday 26 September 2025, in which the Plan and its supporting documents were available to the public and consultation bodies online at [Strumpshaw Neighbourhood Plan | Broadland and South Norfolk](#).
- 1.2. During the publication period, representations were received from various different organisations/individuals: [Strumpshaw Neighbourhood Plan Consultation Statement | Broadland and South Norfolk](#).
- 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 end of 2025 and start of 2026 (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 of a Neighbourhood Development Plan](#);
 - 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.

2. The Examiner's Report

- 2.1. The [Examiner's Report on the Strumpshaw Neighbourhood Plan](#) concluded that, subject to amendments (as set out in the report), the Plan can proceed to referendum. The Examiner also concluded that the area of the referendum does not need to be extended beyond Strumpshaw parish.

3. Referendum

- 3.1. The referendum for the Strumpshaw Neighbourhood Plan was held on 7 May 2026.
- 3.2. Out of an electorate of 573, 344 votes were cast representing a turnout of 60%.
- 3.3. 299 voted Yes, 41 voted for No and 4 ballot papers were rejected.
- 3.4. The vote in favour of the Neighbourhood Plan was 86.9% which was greater than 50% of those voting.

4. Next steps

- 4.1. If both the Broads Authority and Broadland Council make/adopt the Neighbourhood Plan, it becomes part of the Development Plan for the area. The policies have the same weight as Local Plan policies when making decisions.

Author: Natalie Beal

Date of report: 23 June 2026

Planning Committee

3 July 2026

Agenda item number 12

Norwich City Council's Affordable Housing SPD-endorsement

Report by Planning Policy Officer

Summary

Norwich City Council has produced an Affordable Housing Supplementary Planning Document. The Broads Authority Local Plan defers to/has regard to the Affordable Housing policies of our districts, including Norwich City Council. It is therefore necessary to endorse this SPD in case any future housing schemes in the Norwich part of the Broads need to provide affordable housing.

Recommendation

That Members endorse the SPD and recommend that Broads Authority endorses the SPD.

1. Introduction

- 1.1. Members will recall that both the currently adopted and the emerging Local Plan for the Broads have regard to/defers to the affordable housing policies of our districts. This is mainly because our districts are the Housing Authorities for our area.
- 1.2. Norwich City Council has produced, consulted on and adopted a Supplementary Planning Document (SPD) relating to Affordable Housing. Members may recall that the Authority provided some minor comments as part of the consultation that was held in May 2026.
- 1.3. The SPD can be found here: [Supplementary planning documents \(SPDs\) in progress | Norwich City Council](#). Please note that the final date that local planning authorities in England can formally adopt new Supplementary Planning Documents (SPDs) is 30 June 2026; at the time of writing, it is not known when the City Council will formally adopt the SPD.
- 1.4. The SPD includes wording that explains that it may be relevant to schemes in the Broads.
- 1.5. As a way of seeking to ensure this SPD can be used in any relevant planning applications in the Norwich part of the Broads, it is necessary to endorse the SPD.

1.6. Please note that the Authority would be endorsing the SPD rather than adopting it. This is a pragmatic approach to ensure that the SPD can be used in determining any schemes that require affordable housing. It is an approach we have undertaken before for these SPDs:

- [East Suffolk Healthy Environments SPD](#)
- [Great Yarmouth Borough Council Open SPD](#)
- [East Suffolk Affordable Housing SPD](#)

Author: Natalie Beal

Date of report: 18 May 2026

Planning Committee

3 July 2026

Agenda item number 13

Recent consultation responses- for information

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's response to planning policy consultations received and replied to since February 2026. This is for information.

Recommendation

To note the report.

1. Introduction

- 1.1. Appendix 1 shows planning policy consultation documents received by the Authority since February 2026 Planning Committee meeting, together with the officer's response. Many of these had been sent to Committee Members for comment prior to submitting the response.
- 1.2. The report is for information.

Author: Natalie Beal

Date of report: 27 April 2026

[Appendix 1 - Permitted Development Rights for Onshore Wind Turbines in England](#)

[Appendix 2 - Filby Neighbourhood Plan \(review\) Regulation 16 version](#)

[Appendix 3 - Design and Placemaking Planning Practice Guidance Consultation](#)

[Appendix 4 - Fleggburgh Neighbourhood Plan Regulation 14](#)

[Appendix 5 - Hoveton Neighbourhood Plan Regulation 14](#)

[Appendix 6 - Biodiversity net gain: considering a targeted exemption for brownfield residential development](#)

[Appendix 7 - Supplementary Planning Document \(SPD\) on affordable housing in Norwich](#)

Appendix 1 - Permitted Development Rights for Onshore Wind Turbines in England

Department for Energy Security & Net Zero

Document: [Permitted development rights for onshore wind turbines in England: consultation document - GOV.UK](#)

When sent to Members: 7 April 2026

Due date: 10 June 2026

Proposed level: Was endorsed by Members by email.

Notes

This consultation seeks views on proposals to introduce a new permitted development right (PDR) for small-scale, non-domestic onshore wind turbines in England. The aim of the proposed PDR is to support the deployment of low-impact, small-scale renewable energy infrastructure by increasing planning flexibilities for non-domestic contexts, such as businesses, farms, and public sector organisations, while ensuring appropriate safeguards are in place to manage potential impacts. Key elements of the proposal and relevant consultation questions are outlined in Table 1 below (Questions 1-12). In addition to this proposal, this consultation explores the interaction between the proposed PDR and Environmental Impact Assessments [footnote 3] (Question 13).

The government is not proposing changes to the existing PDRs for turbines in homes and gardens due to concerns over their effectiveness in domestic settings and the potential for inappropriate developments. However, we would welcome views on whether improvements could be made (Question 14).

We have also considered whether PDRs could be applied in other settings such as for repowering or community energy projects. We are not proposing to introduce a new PDR in these contexts due to higher potential impacts and limited suitability to these types of developments. However, we welcome views on whether changes to the planning system could further support these projects (Questions 15, 16 and 17).

The final questions provide a space to add any further comments about the proposal or to provide further evidence on small-scale wind turbines and their impacts (Questions 18, 19 and 20).

Response

Eligible contexts

1a. Do you agree that a new PDR should be introduced for a wind turbine in non-domestic settings?

Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Without the planning application route, the impact on the setting of protected landscapes may not be considered.

Number of turbines

2a. Do you agree that this PDR should be limited to a single turbine within the boundary of the curtilage?

Yes. Anything more would benefit from considerations made during assessing planning applications.

2b. Please explain your answer.

More than one turbine will have different impacts than a single turbine and therefore assessment during the planning application process is required.

Additional or larger turbines

4a. Do you think that a PDR should facilitate the installation of larger turbines on a site

No. Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Allowing one turbine outside of the Broads is one thing but allowing more and larger is different. Without the planning application route, the impact on the setting of protected landscapes may not be considered. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

4b. Please explain your answer, including any evidence, examples or case studies that inform your view.

4c. What types of impacts (positive or negative) might arise from allowing larger turbines to be installed under a PDR?

Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Allowing one turbine outside of the Broads is one thing, but allowing more and larger is different. Without the planning application route, the impact on the setting of protected landscapes may not be considered. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

4d. Do you think that a PDR should facilitate the installation of multiple turbines on a site?

No. Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Allowing one turbine outside of the Broads is one thing, but allowing more and larger is different. Without the planning application route, the impact on the setting of protected landscapes may not be considered. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

4e. Please explain your answer, including any evidence, examples or case studies that inform your view.

4f. What types of impacts (positive or negative) might arise from allowing multiple turbines to be installed under a PDR?

Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Allowing one turbine outside of the Broads is one thing, but allowing more and larger is different. Without the planning application route, the impact on the setting of protected landscapes may not be considered.

4g. If you answered 'yes' to Q4a or Q4d, are there specific criteria the policy could introduce to help determine when more than one turbine or larger turbines may be appropriate?

The impact on the setting of protected landscapes would be difficult to adequately address with PDR. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

4h. If you answered 'yes' to Q4a or Q4d, what criteria, safeguards, additional requirements or approaches should apply to ensure that the impacts of allowing more than one turbine or larger turbines could be effectively managed?

The impact on the setting of protected landscapes would be difficult to adequately address with PDR. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

Excluded sites

5a. Do you agree with the proposed list of areas where the PDR will not apply?

Yes. We are pleased that the Broads is listed as it is a protected landscape and a member of the National Park Family. We also support the condition of exclusion and thus needing prior approval on PL's SSSI and within established SSSI buffer zone. There is no mention of siting carefully, to avoid migration routes and the most sensitive areas for nature, such as those frequently used by rare and threatened species. Will guidance be produced to support decision making?

Additional siting conditions

6a. Do you agree with the proposed additional condition to minimise visual impact on nearby heritage sites and important landscapes?

It is good that you have considered intervisibility, but we are concerned that there is a presumption in favour even where an impact is identified. Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. We would suggest a further condition that the developer consults the relevant

authority if the turbine would be potentially visible from a protected landscape or heritage site.

6c. Do you think the proposed conditions are sufficient to prevent impacts from turbines installed on land nearby or adjacent to designated habitat sites?

What about impact on birds and bats outside of habitats sites – perhaps turbines en route to the habitats sites. So perhaps the impact on birds and bats needs to be a consideration on its own. Also, the impact of turbines on peat - there appears to be growing concern relating to locating turbines on peat soils. The concern being, generally, that constructing turbines on peatlands damages the peat and leads to increased drainage, both of which result in decomposition and carbon emissions.

Visual and environmental considerations

10c. Do you agree with the proposed condition on removal of the turbine and associated infrastructure when no longer needed?

If it is a PDR, how would this be enforced? Who would monitor that the site has been returned to its original condition? And what is 'as soon as practicable'?

10d. Please explain your answer.

Existing permitted development rights

14a. Do you think government should make changes to existing PDRs for small-scale turbines in domestic settings?

No, for the reasons set out in the introduction to the consultation document.

14b. Please explain your answer. If you have said yes, please include changes you think government should make.

Repowering and community energy projects

15a. Do you think government should introduce a new PDR for repowering projects?

No, for the reasons set out in the introduction to the consultation document.

16a. Do you think government should introduce a new PDR for community energy projects?

No, for the reasons set out in the consultation document.

Appendix 2 - Filby Neighbourhood Plan (review) Regulation 16 version

Filby Parish Council

Document: [Filby Neighbourhood Plan \(Review\) Regulation 16 Consultation - Great Yarmouth Borough Council](#)

When sent to Members: 24 February 2026

Due date: 20 March 2026

Proposed level: Was endorsed by Members by email.

Response:

- Para 11 – you need to mention the emerging Local Plan for the Broads and that it proposes a development boundary for Filby.
- In the vision, there are some words without spaces between them.
- Figure 2 – if new housing is **built**
- Repeating the title of the policies on different pages, if the policy goes over more than one pages, is a bit confusing. Suggest just one title. You highlight the policy well and that should be enough.
- Policy H1 part 1 – by the first sentence, I think you mean M4(2). I suggest you say that so there is no avoidance of doubt as to what you are referring to.
- Policy H1, part 2, first bullet point – the second part of the sentence is explanatory text.
- Throughout – number or letter bullet points in policies for ease of reference.
- Throughout – you might want to consider how to future proof the Plan against the emerging NPPF, particularly specific paragraph references – perhaps make them generic?
- Para 46 – the Broads Authority Design Guide is a SPD
- Para 58 – needs to reflect the Local Nature Recovery Strategy
- Para 62 – missing word? ‘Other biodiversity improvements **are** encouraged including planting or establishing suitable local habitats that enrich the population of local species’
- Para 63 – the reference in the 2019 Local Plan is SSTRI. The POSSTRI is from the Preferred Options version of the emerging Local Plan. Please amend.
- Policy E1 f – the Norfolk LNRS is completed and has been in place for a little while now.
- **OBJECTION** Policy E1 h – needs to refer to the need for habitats regulation assessment.
- Throughout – lots of words don’t have a space between them.
- Para 78 – this is incorrect. There are Local Green Spaces allocated in the Local Plan for the Broads – see policy SSLGS.
- Policy E3, last paragraph – is that more for supporting text?
- **OBJECTION** Policy E4 – para 81 is stronger in its requirement to fully justify the need for lighting in the first place than the policy. The first couple of sentences of that paragraph need to be included in the policy – the policy does not say anything about justifying the need for lighting in the first place.
- Para 90 – it is not clear what HOU3 of the GYBC Local Plan has to do with soils and BMV land.

- Para 91 – ‘may need to include an up-to-date agricultural land classification survey to determine land quality in accordance with current guidelines’ – is the Neighbourhood Plan saying these are needed or not needed? It is not clear what the purpose of this sentence is.
- Policy E5, third para, second sentence does not really make sense. Should it be: ‘Proposals affecting such land will only be supported where it is clearly demonstrated that the development is necessary, no reasonable alternative **for siting the proposed development on soils** of lower quality exists, and the benefits of the proposal significantly and demonstrably outweigh the harm’.
- **OBJECTION** Policy E5 – given that the plan often boasts of the Broads being in the parish, it is odd there is no mention of protecting the character and setting of the Broads given its status as equivalent to a National Park. Something like ‘protecting the landscape and setting of the Broads’ needs to be included in the policy.
- Throughout – when referring to how people travel to work, use Census 2021 with care due to lockdowns. The County Councils tend not to use that Census, instead using the 2011 Census.

Appendix 3 - Design and Placemaking Planning Practice Guidance Consultation

MHCLG

Document: <https://www.gov.uk/government/consultations/design-and-placemaking-planning-practice-guidance>

When sent to Members: 24 February 2026

Due date: 10 March 2026

Proposed level: Was endorsed by Members by email.

Response

General comments

- The front cover image and Figure 3, 5, 6, 7, 8, 9 are bizarre. The emerging NPPF talks about provisions for wildlife and even talks about supporting hedgehogs (N2 1f). Yet look at the back garden fences and there is nothing natural about them or indeed no access for hedgehogs – as referred to in para 93, second bullet point. I know this is an image, but you would have thought something like that would have been reflected in it. The image is actually sterile for wildlife – a token hedgehog or even a swift would be useful.
- Although the National Design Guide, and two part National Model Design Code are good and useful documents, having so many different documents to refer to is rather cumbersome and not very user-friendly and so the consolidation into one document is a good thing.
- Its good that the document is a visual one.
- General point: There is not sufficient information in relation to development in rural areas. For example, some of the diagrams should reflect how the principles contained in the document can be applied to development in rural areas.
- It is noted in policy CC3 of the draft NPPF that suitable mitigation against wildfires, including measures such as the incorporation of firebreaks, is to be required for sites adjacent to agricultural land, heathland or woodland (I have also noticed some of our Neighbourhood Plans are also now suggesting such measures). Please could this PPG provide some guidance on how these measures can be successfully incorporated into the design of developments and the wider environment?
- Figure 2 and para 17 – what about resilience to climate change? Para 52 mentions it, but it is not included here. Also not included in para 55. But is included in C3 and para 76.
- Para 41 – what is the update regarding M4(2) and M4(3) as per Government consultation in the last couple of years?

- Figure 8 doesn't really describe what is shown. It is presumed this is bin storage. Figure 13 for example says what it is showing.
- Page 5: It is stated that the MHCLG will be producing a series of model design codes and templates for LPAs to use. To date, guidance has (to some extent understandably) focussed on design codes in urban or masterplanning contexts. Could it be ensured that a model design code and template be provided for development in rural areas, where much smaller scale developments are more likely and there can be different considerations?
- Page 7, para 11: It is good to see the re-iteration of the NPPF policy that proposals that are not well-designed should be refused.
- Page 17, para 44 – it's good to see some reference to rural areas.
- Page 18, para 46 – agree that front gardens should include planting to enhance the appearance but the document should also highlight the biodiversity benefits planting can bring. I'm not sure how the planting would be controlled? Is it expected that planners would insist on a planting scheme for new development that would be conditioned and enforced? At present, even when landscaping is conditioned it is often not implemented by developers or enforced by LPAs. This is an issue and can mean that the appearance and liveability of new developments is not up to the standards presented in the planning application and expected by new residents.
- Page 28, para 81 refers to green and blue spaces but the rest of the section relates predominantly to green spaces and infrastructure. Should there be more reference to blue infrastructure (where applicable)? Also on this issue, green infrastructure is listed in the glossary ('Appendix 1: Definitions') but blue infrastructure, which is probably less widely known is not. Please could that be added to the Definitions?
- Should green and brown roofs be included in the Definitions? Also 'ecological niches'?
- On various pages, including pages 31 and 33, the retention, protection and enhancement of ancient woodland is mentioned, which is positive. However, shouldn't the guidance be encouraging the retention of all woodland, given the climate and biodiversity crisis?
- Page 36, para 105 and 106: although I agree with the street layouts and hierarchies suggested, design needs to be realistic about car ownership and the number of car movements in reality, rather than what we might like in an ideal world. Numerous developments with cul-de-sacs and narrow streets with shared surfaces have inadequate parking and turning areas and what were envisaged as attractive communal spaces have ended up as informal car parks, that create a dangerous environment where drivers, pedestrians and cyclists are forced to park and manoeuvre dangerously as there are insufficient areas to park. Streets are too narrow for the number of vehicle movements, especially when cars are parked on the streets.
- Page 38, para 117 – parking should also be designed to be sufficient for the likely number of cars in the particular environment – including deliveries and visitors. This can be even

more of an issue if there are facilities such as a care home, school, nursery or shop, where more visitors can reasonably be expected and there is insufficient parking to accommodate them. This is not such an issue in urban areas where better public transport, walking and cycling opportunities exist but can be more of an issue in suburban and potentially rural areas.

- Para 53 is at odds with emerging NPPF PM13 – what is the point in the design guide at para 53 saying ‘By prioritising energy efficiency...’ when PM 13 limits issues to which quantitative standards can be set.
- Page 53, para 64: should the retention of existing features (e.g. historic walls and other built features, plot and field boundaries, conversion of existing buildings where possible) and consideration of existing features off the site (e.g. creating views and focal points to architectural features such as church towers) be included in the bullet points as a way of enhancing or creating identity?
- Figure 12 – title does not read well. Maybe it is ‘rainfall **and/or** greywater’?
- Figure 12 and 14 C – not sure what the image is showing highlighted in relation to minimising climate risks and water... it highlights a portion of roof.
- Para 68 – what about avoiding areas at high risk of flooding as per the NPPF?
- Para 70 needs to refer to incorporating existing trees.
- C4 just really focuses mostly on cooling and keeping cool. Not much really about warm homes.
- Page 72 image doesn’t really show nature. It shows a bit of planting.
- N1 – what about blue infrastructure? Para 81 introduced blue spaces.
- Para 82, bullet point 4 is supported, but no images reflect this. The front cover and the snippets from it through the document show fenced which will interrupt wildlife networks.
- Page 84, the existing and proposed NPPF both contain policies that require that conditions should not be used to diminish the quality of approved scheme (policy DP4c of the proposed NPPF). I would suggest that something is added in this section to reiterate that proposals should be deliverable and variation of condition applications should not be used to water-down the quality of approved schemes (this is something we regularly come across).
- Page 86, para 268 – it is not just major developments that require DASs (e.g listed building consent applications and certain applications in conservation areas). This should be made clear.
- Para 91 – biodiversity enhancements is different to net gain. Biodiversity enhancements could include a swift brick, but that is not BNG; it is provision for a species rather than net gain on a lost habitat. The two are different.

- Figure 21 does not really highlight anything that is included in the chapter - it highlights paths across open spaces – described in Figure 26 as ‘landscaped pedestrian route’.
- M5 only mentions cycle parking briefly. If the movement hierarchy has cycling towards the top, there needs to be more on cycle parking.
- Para 180, second sentence not finished.

Answers to questions:

- Q6: Yes the useability has certainly improved
- Q7: More emphasis on how the principles relate to smaller developments and those in rural areas.
- Q8: I don’t know – do you Nat? I would have thought the high-level principles would apply
- Q10: Yes
- Q11: Resources are the main issue for most LPAs. Additional resources for LPA to adequately resource the development and ongoing implementation, monitoring and updating of design codes. Ideally this would be through funding to provide in-house roles and upskilling, rather than bringing in consultants to produce the document, so that LPAs develop more in-house capabilities.

Appendix 4 - Fleggburgh Neighbourhood Plan Regulation 14.

Fleggburgh Parish Council

Document: <https://www.fleggburghparishcouncil.co.uk/neighbourhood-plan-consultation>

When sent to Members: 24 February 2026

Due date: 08 March 2026

Proposed level: Was endorsed by Members by email.

Response

Neighbourhood Plan

- Para 14 ends with 'The Broads Authority's policies must be read alongside those in the Neighbourhood Plan where relevant'. This applies to the GY Local Plan, so this needs to be included in para 13 as well.
- Para 15 will need updating to reflect the transition arrangements for the emerging NPPF.
- Para 17 – does the preparation of the new Local Plan for the Broads also influence things?
- Page 5, objective B – not just the landscape setting of the Broads, but also the Broads itself?
- Images need alt text
- Page 13, Figure 3 – I would suggest that the 'character areas' map be made larger to make it easier to read and identify the exact boundaries of the character areas.
- Para 31 – include Broads Local Plan equivalent policy.
- Section 5 needs to refer to the Broads Design Code SPD.
- Do the images need to be explained or have a title to explain what they are showing and why they are included?
- Policy 2, intro paragraph: 'All new development within the parish must demonstrate high-quality design that respects local character and contributes positively to the landscape character and the rural setting of the Broads'. Part of the Broads is actually within the NP area. So it is not just the setting of the Broads.
- Policy 2 a – similar to the intro paragraph: 'Be well integrated with its surroundings, maintaining a clear transition between the built-up area and open countryside and protecting the landscape and setting of the Broads'.
- Policy 2h – you might want a footnote referencing our [Broads Authority biodiversity enhancements](#) guide. You do so at para 56, but suggest the footnote at policy 2h.
- Suggest putting the entire policy in blue shading, not just the title. That makes the entire policy stand out and obvious. The policy on page 13 for example includes the title twice which would not be needed if the entire policy was shaded blue.
- Section 6 – minor comment, but the image does not really celebrate Fleggburgh's biodiversity that the policies in that section then seek to protect – the image is of a driveway with trees and hedges.
- Section 6 – you need to refer to the Local Nature Recovery Strategy.
- Para 50 - as this is a planning document, best not to refer to the Broads as National Park.
- Policy 4 para 2 – what are biodiversity credits referred to?

- Policy 4 para 3 – you need to future proof – the emerging NPPF refers to minor, medium and large development. Perhaps you mean medium and major development?
- Policy 5 – how does this fit with the NPPF tests for local green spaces which treats them like green belt? That is not referred to anywhere.
- Policy 5 – should the local green spaces be included in the policy or the map referred to?
- Policy 6 para 2 says ‘Outside the Broads Authority Area, where Policy SP4 of the Broads Local Plan applies...’ – this can be read that SP4 applies outside of the Broads area. What you are saying is that SP4 does not apply outside of the Broads Area.
- Throughout – add para numbering to policies paragraphs and bullet points for ease of reference by people in the future who want to use the policy.

Objection

- Policy 6’s stance on Best and Most versatile agricultural land is contrary to policy SP4 of the Local Plan for the Broads. The supporting text of that policy includes two tests:
 - A: unless it can be demonstrated that the need for the development clearly outweighs the need to protect such land in the long term,
 - B: or in the case of temporary/potentially reversible development that the land would be reinstated to its pre-working quality, and there are no suitable alternative sites on previously developed (brownfield) or lower quality land’.
- The NP policy has two tests.
 - 1 The land is not in active agricultural use and there are no reasonable opportunities for continued productive use; or
 - 2 The proposal would deliver significant community benefits that clearly and demonstrably outweigh the long-term harm resulting from the loss of such land.
- A and 2 kind of match.
- 1 brings in another test, different to the Local Plan for the Broads.
- Policy 6 – paragraph starting ‘For the purposes of this policy...’ – that seems to be supporting text.
- Policy 6 – ‘protect the landscape and setting of the Broads’ – again, to reflect that part of the Broads is within the NP area, so it is not just about the setting.
- Policy 6 – last part – you may want to refer to our guide: [A guide to integrating development into the Broads Landscape](#)

Objection

- Policy 7 does not talk about justifying the need for lighting in the first place. There is something at part 3 of the policy (under the bullet points), but that is not as strong as the supporting text on page 30 at para 72. The strength of wording from para 72 needs to be included as a new para 2 of the policy rather than part 3 of the policy.
- Policy 8 part 1 is about all types of flood risk, not just surface water.
- Policy 8 – does this add anything to national and Local Plan policy?
- Page 41 – care is needed when using the Census 2021 for transport purposes. It was a lockdown year. The County Councils seem to ignore it or at the very least quote that and the 2011 Census.
- Policy 10 seems to have three parts and may benefit from being presented as a three part policy rather than one paragraph.

- Para 102 – where is the data from?
- Para 104 – what year is this data from?
- Policy 11 – I understand what you are trying to say, but I don't think 'Development must not harm highway safety' is the best way of saying it. Do you mean cause highway safety issues? Cause safety concerns? Need to consider highway safety?
- Throughout – having policies go onto two columns with a repeated title is a tad confusing.

Evidence base document

- Page 14 – you may want to update the road traffic incident for the next consultation as the data you have is until 2023.
- Page 19 onwards – you may want to include the 2011 travel to work information. I am aware that the County Councils tend to not use 2021 travel to work because of the lockdowns. Perhaps use both Census?
- Images need alt text
- Flood risk data – last year, there was updated flood risk layers releases by the EA – does this reflect them? There is also another release of flood risk data in the next few weeks. You may want to check and ensure the information is correct for the next consultation.
- Did you want to reflect the most recent deprivation data?

Design Guidance and Codes:

- Page 9 – amend name of our design guide / code to Broads Authority Design Guide and Code
- Page 25 – Built Form – Massing and Scale – it states that 'new homes should be designed to align with the height of mature trees'. This seems a slightly strange way to assess the acceptability of the height of new buildings. Firstly many mature trees are taller than an average two storey home – so is this leaving it somewhat open to people arguing for taller buildings than might be acceptable in this area? Secondly trees grow, so even if it is considered the height of the trees in the area might be an acceptable height for a new house now, they might not be in 10-15 years.
- Page 36 – it might be useful if the PROW dotted line was different colour to the hatching for the Broads and Green Network, as it is hard to see PROW in these areas.
- Page 39 – the photo for 'white timber window frames' appears to show UPVC windows.
- Page 46, Fig 53 – I think these are paving slabs rather than a permeable block driveway. The image used for figure 21 could be used again?

Appendix 5 - Hoveton Neighbourhood Plan Regulation 14.

Hoveton Community Council

Document: <https://hoveton-cc.gov.uk/hoveton-neighbourhood-plan/>

When sent to Members: 23 April 2026

Due date: 01 June 2026

Proposed level: Was endorsed by Members by email.

Response

Neighbourhood Plan

- Para 14 – Neighbourhood Plans need to reflect the policies in the NPPF as well.
- Para 15 – The Local Plan for the Broads is at examination.
- Para 18 – I wouldn't say the other document are supplementary documents – sounds a lot like Supplementary Planning Documents and could cause confusion. Maybe call them supporting documents.
- Para 44 – First part – all houses are built for those who live in them. Perhaps in relation to self/custom build you might want to say something like 'built with involvement of those who will live in them'.
- Para 48, p21: says that the proposed housing sites are shown in Figure 3 but I think its figure 4.
- Policy HNP1 part a – suggest the second part is supporting text rather than policy text.
- It is confusing to have the same title repeated for a policy that spills over two pages. The policies are highlighted blue and that shows they are a policy.
- Para 49 – the brownfield land off Station Road is in the adopted Local Plan and is policy HOV3. It is in the emerging Local Plan for the Broads and that reference is PUBHOV3.
- Page 23, Policy HNP4: I would suggest that the 'where practicable' in para 51 and policy HNP4 b and d in relation to the retention of heritage assets on the King's Head site should be removed. The forthcoming Local Plan takes a stronger stance on the re-use of existing buildings, rather than demolition and there are also tests in the existing and forthcoming Local Plan policy DM11 (PUBDM13) Heritage Assets, which would need to be met, as well as requirements in the NPPF. I would suggest that part b of the policy should read: 'Retain and sensitively reuse the existing cottages and stable buildings adjacent to the King's Head pub'. If it is felt necessary, it could go on to state, 'Development resulting in harm to or loss of these buildings would only be acceptable where it meets the tests set out in the Broads Local Plan Policy PUBDM13'.
- Policy HNP4, g – perhaps say that proposals meet national flood risk policy requirements as well as resilience.
- Policy HNP4 – for your information, we intend to reconsider the area to which PUBHOV3 applies. It may be that we accept that the Former Hotel Cottage stays as a car park. There is a planning application in with us now. It seems the car park is well-designed and well-used. This is all to be confirmed and you will of course be consulted on any modifications to the Local Plan. But I just wanted to mention this potential change.

- Policy HNP4 part b – I would suggest that reference to the Local Plan for the Broads is made at the end of this in some way. Our criterion on this is a bit stronger and in the emerging Local Plan, we introduce stronger stance on re-use and on demolition. As written, without some reference to that, this criterion may conflict with the Local Plan for the Broads.
- Page 23, para 51: You should state that the Kings Head cottages and stables are considered Non-designated Heritage Assets in the Neighbourhood Plan and cross-reference to policy HNP24, the objectives of which would also need to be met.
- Policy HNP5 e – did you want to say ‘if required’ after the reference to BNG? I am aware that, for example, the size of schemes to which BNG applies is going to change.
- Policy HN6: Design g) In parts of Hoveton the number of signs leads to visual clutter and reduces the effectiveness of the signs. Would it therefore be worth adding something to state that existing signage should be rationalised and consolidated to reduce visual clutter?
- Policy HNP7 – I am not sure what this means in practice: ‘Where both brownfield and greenfield development options are available and deliverable, preference will be given to proposals that make effective use of brownfield land’. The two allocations are on greenfield land as I understand it. And the general thrust is perhaps along the lines of the more houses the better. I am not sure what this part really means and what a Development Management Officer will do with it.
- Policy HNP8 – you should refer to the retail policies of the NNDC and BA Local Plan and also policy HOV5 and PUBHOV5 and any NNDC equivalent.
- Para 106 says ‘Applicants must calculate a nutrient budget for their development and secure appropriate mitigation, whether through on-site measures such as 41 42 wetlands, tree planting or nutrient-removal SuDS, off-site land-use changes, or through participation in the Broads Authority’s strategic mitigation programme’. The Broads Authority does not have such a programme. What are you referring to here?
- Page 46-48: The Hoveton Hall estate is mentioned several times, but would it also be worth mentioning the Hoveton House estate (which includes Bewilderwood but lots of other land), another large estate in the Hoveton NP area?
- Policy HNP14, third part – ‘and sensitively designed’ part does not read well. Maybe it is a new sentence that requires such infrastructure to be sensitively designed.
- Para 123 says ‘the site’ – is it linked to BeWILDerwood? Should 123 form part of 124 for continuity?
- Did you want to mention that there is a detailed policy relating to BeWILDerwood in the Local Plan for the Broads?
- Natural Environment section – this does not mention the Local Nature Recovery Strategy (LNRS) for Norfolk that has been in place for some time now. This is a key bit of data and a very important strategy that needs to be included in this section. How does Figure 16 relate to the LNRS?
- The Natural Environment Section is almost entirely about the terrestrial habitat but there is almost nothing about the rivers and lakes.
- Para 132 – what does ‘near’ mean?
- Page 52, Figure 17 – appears to show part of the Station Road brownfield site covered by policy HNP4 as Local Green Space (site 1). Perhaps the boundary needs to be more closely drawn to the riverside walk / Riverside Park area?
- HNP16 and 17 need to refer to the LNRS.

- Policy HNP17 – what are Hoveton’s Ecological Networks? Are these mapped? Figure 16 is called green corridors. Or are A and C of the policy the ecological networks?
- Page 56, Policy HNP18: should this include some words to state that proposals to enhance these spaces would be welcomed and supported? There are some spaces that would benefit from enhancement.
- Page 60, Policy HNP19c: add ‘harm the character of Broads landscape **or waterscape**’
- Policy HNP20 – this goes straight into lighting design rather than seeking justification for lighting in the first place.
- Page 59-60, Would views up and down the river from Wroxham Bridge not be considered important viewpoints? Or views from the river?
- Para 148 – the developments don’t have to pay the tariff; they might want to address the mitigation in another way. The issue is that they need to mitigate for their impact and the tariff is likely to be easiest and potentially most cost-effective way of doing it.
- Paras 147 to 152 seem to fit with policy HNP16 part f.
- The 3 rivers way is a prominently signed cycling route, but it doesn’t seem to get mentioned, should it be?
- Policy HNP22 part d and HNP23– need to refer to HRA when promoting access to potentially protected sites. You kind of refer to it in part d of HNP23, but you might want to talk about it in supporting text and in HNP22 and refer to HRA?
- Policy HNP26 f – this is not really related to the other bullets. The other bullets refer to existing upper floors whereas f relates to new – suggest this becomes its own section.
- Is there a community action relating to working with those buildings with upper floors about the potential for better use of the upper floors?
- Policy HNP27 c – this is written as an ‘or’ policy. Isn’t the ideal outcome that the public realm and signage and walking and cycling connections are all improved?
- Policy HNP28 includes flood risk, but there is policy HNP21. Why are both needed? Could they be combined to have one policy on flood risk?
- Page 70 – I would suggest that they check the listed buildings as it is currently incorrect. They have shown the Old Vicarage as being grade II listed but it is not listed at all but they have not shown Leisure Hour or Church Farmhouse which are listed. I would suggest they refer to Historic England’s website ‘Search the List’ and do a map search [here](#).
- Page 70, figure 23 is supposed to shown designated heritage assets, but it does not show Wroxham Bridge which is a scheduled ancient monument and is therefore a designated heritage asset.
- Page 71-72, Non Designated Heritage Assets: It would be useful if more detailed mapping can be provided for buildings such as no. 21 Wet Sheds so we can be certain which sheds you are referring to (it is noted that they are shown in more detail in the NDHA assessment).
- Para 201 – HNP18 is on Local Green Spaces.
- Policy HNP28 is mostly about flood risk. It is only part d that is about other issues.

Evidence

- Introduction, end of para 2 says ‘Although a neighbourhood plan has little role to play in the protection of national landscape designations, it is still worth including such evidence as it is useful context that helps people to gain a greater understanding of their area’. Part of the Neighbourhood Area is a protected landscape, so this sentence is confusing..

- Page 16 – above map 4 – and throughout - the Local Plan for North Norfolk has been adopted now.
- Page 18 has a random snippet 'In the Broads Local Plan'
- Page 19 says 'The draft Local Plan' – which Local Plan is that?
- Page 23 and 24 – you might want to focus more on 2011 Census for travel to work. I know that is what the county councils do.
- There is no reference to the LNRS

SEA and HRA Screening

- Page 32, Figure 17, g – don't forget to mention that the Broads is a protected landscape with the status equivalent to a National Park.
- HRA screening – do you need to mention Nutrient Neutrality and RAMS?
- Policy HNP22 part d and HNP23 – need to refer to HRA when promoting access to potentially protected sites. You kind of refer to it in part d of HNP23, but you might want to talk about it in supporting text and in HNP22 and refer to HRA? Might need mentioning in the HRA screening.

Design Guide

- It is not considered that 3.1 Building line, Setback and Layout adequately covers those properties that are positioned adjacent to the water (quite a number of properties in Hoveton). They should either be amended to cover these sites or the BA Design Guide and Code should be referred to for properties in the BA area.
- Page 37, 3.3 Landscaping: This doesn't adequately cover the riverside landscape.
- Page 43, Figure 39 – I would suggest that this is not the best example of a waterside development. I have attached a photo of a couple of better schemes (not necessarily the best photos) which are more akin to the sort of development we would wish to encourage.

Appendix 6 - Biodiversity net gain: considering a targeted exemption for brownfield residential development

DEFRA

Document: [Biodiversity net gain: considering a targeted exemption for brownfield residential development - GOV.UK](#)

When sent to Members: 1 May 2026

Due date: 10 June 2026

Proposed level: Was endorsed by Members by email.

Response

6. Do you support the proposed regulatory definition of residential brownfield development?

Yes

7. Do you agree that the proportion of the land within the planning application boundary should be ≥75% Previously Developed Land (PDL) to qualify?

Yes

8. To what extent do you agree that the proposed regulatory definition aligns with current interpretations of 'Previously Developed Land' under the NPPF glossary for planning decisions?

Unsure

The PDL definition explicitly excludes 'land that has blended into the landscape'; this has been defined in case law so is well understood. If you can't see where the building was in 1948 and when you look across the site and its former position is part of the landscape, then it is likely to have some general biodiversity, and its loss may be significant. The brownfield definition used here should be a subset of the NPPF PDL definition. The omission of the 'blended into the landscape' exclusion means that there will be sites that are classified as brownfield under these regulations that is not classed as PDL under the NPPF. This creates added complexity and has the effect of excluding PDL areas from BNG that are more likely to be rich in biodiversity than the average brownfield site.

9. Overall, do you consider the proposed definition and evidential requirements to be proportionate and workable for applicants and local planning authorities?

Unsure (see question 8 response)

Our answer relates to the definition. You don't talk about evidential requirements in this section of the document.

10. What impact do you think the introduction of a mandatory BNG requirement has had on brownfield residential schemes of less than 2.5 hectares?

I don't know

11. Do you support a targeted area based exemption for residential brownfield development? We are also consulting on a proposed definition of “brownfield development”, including the threshold for the proportion of previously developed land (%PDL). For this question, please answer on the basis that the proposed definition will be taken forward.

No.

The evidence presented in the consultation document points towards this not being a reasonable approach.

One of the conclusions of this and other work is set out at page 27 and says: ‘Although brownfield land is often assumed to support lower ecological value than greenfield sites, the statutory metric assessments and ecological evidence underpinning the calculations indicate that in practice, the biodiversity value of some brownfield sites can be comparable to that of greenfield development²⁸’.

And

Table 3 (and 4 and 5), last column shows a greater loss to nature than cost savings to developer (penultimate column).

These two bits of information seem quite significant, yet there is no detailed consideration of these. Fundamentally, they imply that exempting brownfield land from BNG, above 0.2Ha, will lead to significant biodiversity loss.

With the new threshold for BNG being 0.2Ha and there being the potential for a proxy habitat type to be used rather than open mosaic habitat, there seems to be benefits to brownfield schemes that will still ensure BNG.

I note that you have not done an assessment of using a proxy for open mosaic habitat to understand the costs for developer and the cost to nature. This needs to be done and then it can be compared to the tables 3, 4, 5.

12. If you support a targeted area-based exemption for residential brownfield development, which exemption threshold for a residential brownfield development do you support?

We do not support this exemption for reasons set out in the answer to question 11.

But if there were to be an exemption, perhaps 1.5 hectares.

13. Do you think there is a case for an area-based exemption for residential brownfield development that is greater than 2.5 hectares?

We do not support this exemption for reasons set out in the answer to question 11.

But to answer the question, No

The “sweet spot” seems to be 1.5. From 1 to 1.5 the developer savings are massively increased, with a small cost to nature increase; above that the developer savings do not increase substantially but the cost to nature continues to rise.

14. Do you foresee any unintended consequences arising from a targeted exemption for brownfield residential development?

Yes

The biodiversity on the brownfield land is there. For schemes on brownfield land to not have to do any BNG, there would be a net loss in biodiversity.

One of the conclusions of this and other work is set out at page 27 and says: ‘Although brownfield land is often assumed to support lower ecological value than greenfield sites, the statutory metric assessments and ecological evidence underpinning the calculations indicate that in practice, the biodiversity value of some brownfield sites can be comparable to that of greenfield development’²⁸.

And

Table 3 (and 4 and 5), last column shows a greater loss to nature than cost savings to developer (penultimate column).

These two bits of information seem quite significant, yet there is no detailed consideration of these. Fundamentally, they imply that exempting brownfield land from BNG, above 0.2Ha, will lead to significant biodiversity loss.

What if a developer artificially splits up their brownfield site with numerous applications to ensure that each application is less than the threshold that you introduce? The proposal discourages whole site applications. The redline will be drawn more tightly around building footprints, leaving the remainder, vulnerable to ad hoc sub planning permission ‘development’ (e.g. establishing gardens), future development, or sale to other developers. Could it also reduce garden size as space becomes more limited? If these are important factors, then perhaps 70% would be better than 75%?

15. How easy or difficult do you think it would be for applicants and LPAs to apply this exemption in practice?

We do not support this exemption for reasons set out in the answer to question 11.

But to answer the question, Easy

It could be easy to apply, but tests or a flow chart would need to be provided to ensure a consistent approach to the exemption across the country. Potentially guidance on the type of evidence needing to be submitted by an applicant to prove the site is PDL and a Brownfield Residential Development – not equivalent or even nested definitions.

16. Do you think any additional measures are needed to ensure that the exemption is appropriately targeted in relation to potential ecological impacts?

Yes

The emerging NPPF touches on biodiversity enhancements, such as swift bricks, but if brownfield land is to be exempted from BNG at a set threshold, then there needs to be a strong national requirement for the scheme to provide biodiversity enhancements, perhaps linked to the LNRS for the area. Such enhancements can be effective, but not too pricey.

Also, table 3, 4, 5, last column shows significant impact on nature from the proposed exemption. Would the Government provide the amount of money set out in the last column, related to the threshold that is chosen, to local/regional or indeed national wildlife organisations to spend on seeking net gain?

Should the lost BNG be transferred onto the other non-Brownfield Residential Development sites? So, if there is an 11% loss of units because of the carve out, this is moved onto other sites, so they need an c.11% uplift. That would seem to maintain the purpose, concept and stated outcome of the BNG scheme. Otherwise, it is an unmitigated loss of biodiversity – which feels inappropriate. Would there be another way to mitigate the lost biodiversity gain units?

17. If you have any further evidence about the administrative, viability, biodiversity or nature market impacts for this exemption that you have not provided in previous responses, please provide it in the box below. Any evidence submitted will be reviewed by the department but will not be analysed, summarised, or included in the published government response.

How does this proposed exemption for brownfield schemes above a set threshold fit with OMH proxy idea discussed in the consultation response? If you are introducing a proxy, why does brownfield need an exemption? Also, you are raising the area to which BNG applies to be over 0.2Ha, so some brownfield land schemes would not do BNG anyway.

It seems that a proxy to open mosaic habitat and, no proposed exemption above 0.2Ha will ensure that there is not the loss to nature as set out in table 3 (and tables 4 and 5), last column and also the fact the biodiversity value on brownfield land that is equivalent to greenfield land is not lost.

Both the PDL and the Brownfield Residential Development definitions are clear that these terms only apply to 'land'. What if a site includes or borders on a water course, pond, or lake? Is the red line of the scheme to be drawn to exclude the water? Also, if the line is drawn tightly around the building footprint does that make it more likely that waterbodies will be left out of the development application and be at greater risk from outside the red line impacts from the development or damage due to associated garden development not requiring its own planning permission. If water is included in the definition of Brownfield Residential Development, then this creates another deviation from the definition of PDL – water can be brownfield but not PDL. In which case would the water be exempt from the watercourse metric or other BNG calculations? The water is not PDL. There needs to be clarity about how this will be addressed, and there does not appear to be an obvious satisfactory solution.

What if a brownfield site has a water course bordering it – that is that the red line of the scheme goes up to the water? Would it be exempt from the watercourse metric? The water is not brownfield.

The main reason for this exemption is because it is difficult, if possible, to BNG for open mosaic habitat. But what about other habitats that might be on brownfield land that are not open mosaic habitat? These may be lost with the proposed BNG exemption.

Appendix 7 - Supplementary Planning Document (SPD) on affordable housing in Norwich

Norwich City Council

Document: [Current consultations | Norwich City Council](#)

When sent to Members: 13 May 2026

Due date: 08 June 2026

Proposed level: Was endorsed by Members by email.

Response

Support 1.6 – we will endorse this at Planning Committee and Broads Authority in July.

3.2 – just for information and I don't think it needs to be mentioned in the SPD, but our current Local Plan seeks off-site affordable contributions for schemes of 6-9 dwellings. The emerging Local Plan seeks affordable housing off-site contributions for schemes as follows:

- a) Brownfield schemes located on the waterfront: 3-9 dwellings
- b) Other brownfield schemes: 5-9 dwellings
- c) Greenfield schemes: 3-9 dwellings.

4.3 bullet 1: '...however all sums will be index lined using...' – lined or linked?

Planning Committee

3 July 2026

Agenda item number 14

Customer satisfaction survey 2026

Report by Planning Technical Support Officer

Summary

The Broads Authority's Planning Department has recently undertaken its annual Customer Satisfaction Survey, the results of which show a high level of satisfaction with the planning service.

Recommendation

To note the report

1. Introduction

- 1.1. As part of its commitment to best practice in delivery of the planning service, the Broads Authority as Local Planning Authority (LPA) engages formally with its service users to seek their views on the quality of the service. This is done using a Customer Satisfaction Survey and is undertaken annually. The National Parks follow a similar approach, although they survey every two years. This report sets out the results of this engagement in 2026.

2. Customer Satisfaction Survey

- 2.1. The customer satisfaction survey was undertaken by sending a questionnaire to all applicants and agents who had received a decision on a planning application during the period 1 January to 31 March 2026. A total of 42 survey emails were sent out. This is the standard methodology used by all the National Parks over a given period. The contact details used were those submitted on the planning application form and recipients could respond online through Microsoft Forms.

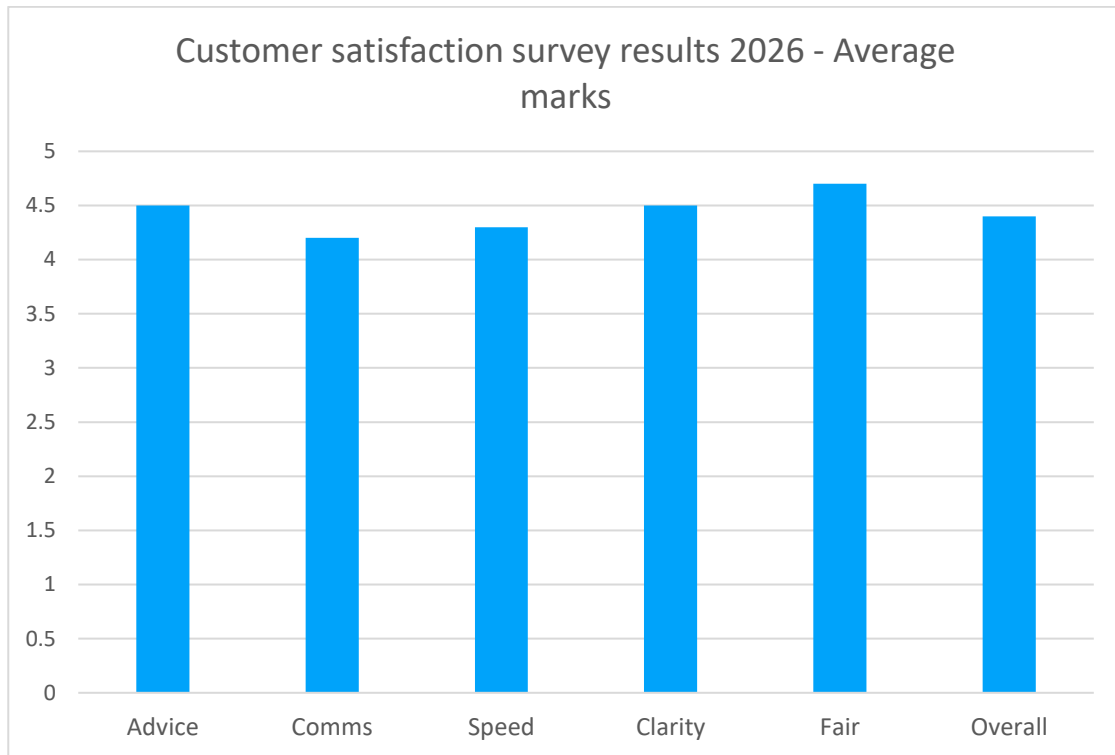
- 2.2. As in previous years, the questionnaire asked the recipients to respond and rate the service in respect of the following areas:
1. Advice prior to, and during, the application process
 2. Communication on the progress of the application
 3. Speed of response to queries
 4. Clarity of the reasons for the decision
 5. Being treated fairly and being listened to
 6. The overall processing of the application
- 2.3. The survey also gave the opportunity for users to rate the service on elements it did well and those which could be improved, as well as giving a general comments section. A copy of the survey is attached at Appendix 1.

3. Responses

- 3.1. Ten responses were received, representing a response rate of 23.8%. This is an increase of 1.2% compared to 2025 (22.6%). The response rate is considered encouraging, and issuing the survey online continues to improve the number of responses received compared to when the surveys were issued by post.
- 3.2. In considering the results from the questionnaire and assessing the level of satisfaction, the scoring parameters are based on information published by Info Quest, a company that specialises in customer satisfaction surveys and analysis. These note that a goal of 100% satisfaction is commendable, but most likely unattainable as people tend to be inherently critical and it is practically impossible to always keep everyone satisfied.
- 3.3. They therefore consider that a customer awarding a score of 4 or above (out of 5) is a satisfied customer. They also note that, on average, any measurement that shows a satisfaction level equal to or greater than 75% is considered exceptional. It should be noted that applicants for all decisions approvals and refusals were asked to take part in the survey. The scoring parameters are:

% Satisfaction	Qualitative Assessment	Comment
75%+	Exceptional	Little need or room for improvement
60% - 75%	Very Good	You are doing a lot of things right
45% - 60%	Good	The level of most successful companies
30% - 45%	Average	Bottom line impact is readily available
15% - 30%	Problem	Remedial actions required
0% - 15%	Serious Problem	Urgent remedial actions required

- 3.4. Customers were asked to rate the service on a scale of 1 – 5, with 5 being the highest score. The respondents' answers are shown below.
- 3.5. Average scores for the questions are shown in the following graph:

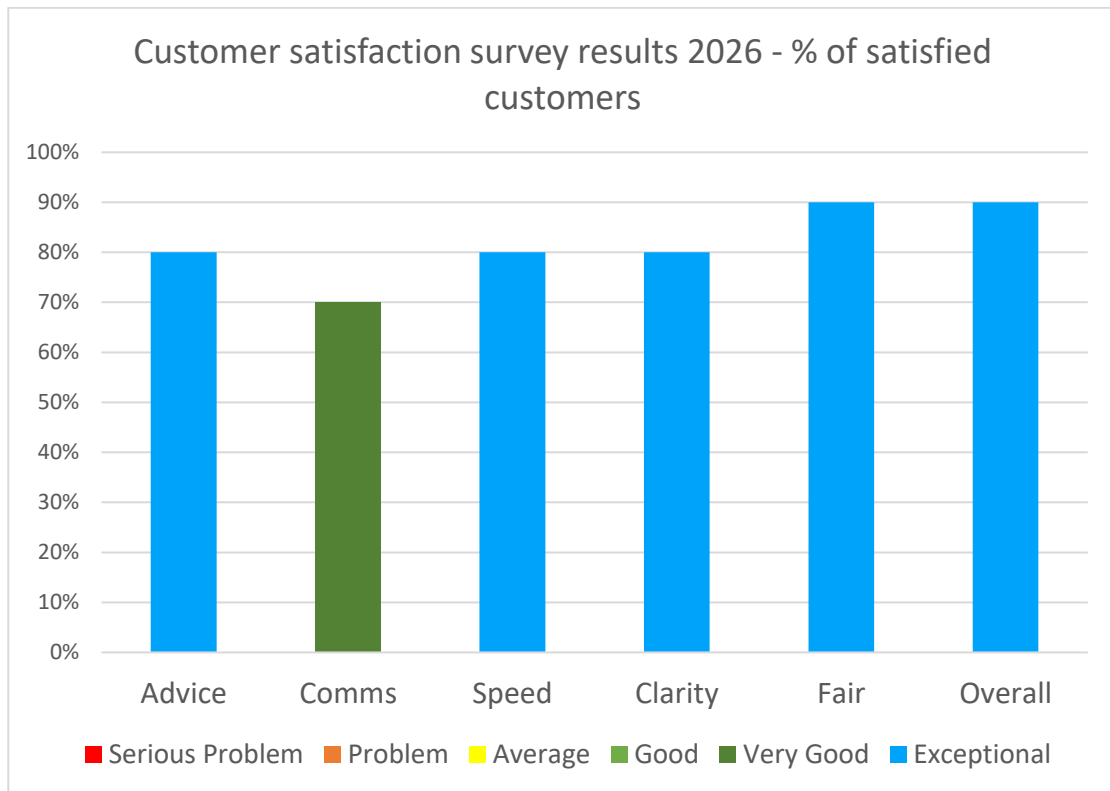


- 3.6. Average scores for the questions are shown in the following table:

Survey category	Average score (out of 5)
Advice	4.5
Comms	4.2
Speed	4.3
Clarity	4.5
Fair	4.7
Overall	4.4

- 3.7. It is noted that all but two responses gave full marks on advice, clarity of decision and fairness.

3.8. The overall results are represented under the satisfaction parameters detailed at 3.3 in the following graph:



3.9. The overall results are represented under the satisfaction parameters detailed at 3.3 in the following table:

Survey category	Percentage of satisfied customers	Qualitative assessment
Advice	80%	Exceptional
Comms	70%	Very Good ¹
Speed	80%	Exceptional
Clarity	80%	Exceptional
Fair	90%	Exceptional
Overall	90%	Exceptional

3.10. The survey also provides an opportunity for customers to comment on what the planning team did well and where improvements could be made. These comments are summarised below.

¹ 03/07/2026 Correction: reference to Good replaced by Very Good

3.11. The areas that were done well were identified as:

- Good communication; useful as it enables easy discussions regarding processes and progress of applications with planning officers
- Beneficial preapplication service to discuss requirements before submitting planning applications
- Helpful and engaging planning officers

3.12. The areas for improvement were identified as:

- Timescales for validation and decision making
- Overly complicated legislation and processes
- Lack of clarity on houseboats and their acceptability

3.13. Four of the ten respondents had no suggestions for improvements

3.14. The areas for improvement have been noted for consideration. However, it should be noted that legislation is set nationally, not by the Authority itself, and timescales are variable and depend on the complexity of the proposals. Further to this, applications can only be validated when all the required supporting information has been received.

3.15. The final question on the form sought suggestions for other improvements, designed to pick up examples of best practice from elsewhere. However, the comments largely reflect those entered on the previous question.

3.16. Most of the comments are likely to be in response to a particular experience or application type. Although this makes the feedback more difficult to interpret, it is considered that these comments are mainly suggestions for improving the service offered, rather than criticisms of the Planning Department's performance.

4. Conclusion

4.1. The results of the survey are positive, although some caution should be exercised in interpreting them, given the low numbers on which they are based. However, customers who have a negative experience are statistically between two and three times more likely to give feedback compared to those who are happy with their experience. Therefore, the low response rate, as well as the generally positive feedback, is likely to demonstrate that on the whole customers are largely satisfied with the service received.

Author: Thomas Carter

Date of report: 15 May 2026

Appendix 1 – [Customer Satisfaction Survey 2026](#)

Appendix 1 – Customer Satisfaction Survey 2026

From: Planning
Subject: Broads Authority Planning Department - Customer Satisfaction Survey 2026

Dear

Your comments on the Broads Authority's Planning Service.

The Broads Authority is carrying out a brief survey of people who have submitted planning applications to us and is asking them for their feedback on the quality of service they received. The comments that we receive are really important to help us understand what we do well and what we need to improve. We know these sorts of questionnaires can be time consuming to complete so we have kept it really simple, but if you want to add further details (or even email or telephone with further comments) these would be very welcome.

All responses received by the 20th April 2026 will be entered into a prize draw, with the chance of winning a trip on one of the Broads Authority's 3 passenger boats (Ra/Liana/Electric Eel). The prize draw will take place on 27th April 2026 and the winner will be informed shortly afterwards.

The application that this email is in reference to is BA/2026/XXXX/XXXX

Please use [THIS LINK](#) to access the survey:

Kind Regards,

Planning Services
Broads Authority
Yare House, 62-64 Thorpe Road, Norwich NR1 1RY

Please note that the Planning Department are mostly working from home. We encourage you to use email and phone for correspondence at this time as this will enable your enquiry to be dealt with more quickly.

Please tell us about your overall satisfaction level around:

5 = very good 4 = good 3 = okay 2 = poor.... 1 = very poor

- | | | |
|---|--|-------|
| 1 | The advice and help you were given in submitting your application | _____ |
| 2 | How well you were kept informed of progress on your application | _____ |
| 3 | How promptly we dealt with your queries | _____ |
| 4 | How clearly you understood the reasons for the decision | _____ |
| 5 | Whether you felt you were treated fairly and your views were listened to | _____ |
| 6 | The overall processing of your planning application | _____ |

Please tell us about:

7 Things we did well

.....

.....

.....

.....

8 Things we could improve

.....

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.....

.....

9 Any other things we could do to improve the service

.....

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.....

.....

Thank you for your time in completing this.

Planning Committee

3 July 2026

Agenda item number 15

Appeals to the Secretary of State update

Report by Development Manager

Summary

This report sets out the position regarding appeals against refusals of planning permission by the Broads Local Planning Authority.

Recommendation

To note the report.

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2022/0007/UNAUP2 BA/2025/0001/ENF APP/E9505/F/25/3361103	Mr Richard Howlett	Appeal start date 19 March 2025 Written reps PINS confirmed no case officers available 25 November 2025	Holly Lodge Church Loke, Coltishall, Norwich	Appeal against Listed building enforcement notice - Installation of UPVC windows	Committee Decision 2 February 2024 PINS inspector visit carried out Tuesday 16th June 2026. Await decision.

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2025/0313/HOUSEH BA/2026/0001/REF PINS - 6006235	Mr Jeremy Clarke	Appeal Start Date 19 March 2026	12 Manor House Yarmouth Road Thorpe St Andrew	Rebuild brick driveway piers. New timber gate.	Committee decision 16 January 2026 PINS will carry out unaccompanied visit

Author: Steve Kenny

Date of report: 22 June 2026

Background papers: BA appeal and application files

Planning Committee

3 July 2026

Agenda item number 16

Decisions made by officers under delegated powers

Report by Development Manager

Summary

This report sets out the delegated decisions made by officers on planning applications from 24 April 2026 to 18 June 2026 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

Parish	Application	Site	Applicant	Proposal	Decision
Barsham And Shipmeadow Parish Council	BA/2026/0093/HOUSEH	The Cottage Low Road Shipmeadow Suffolk NR34 8HP	Martin Dawson	Remove existing conservatory and car port. Build new extension and attached garage	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Bramerton Parish Council	BA/2026/0138/NONMAT	Windmill Cottage Mill Hill Bramerton Norfolk NR14 7EN	Mr Stuart Brand	Adjustment to location of rear dormer wall, omission of porch / additional of small curved glass canopy, external door to bedroom 03 reverting back to window, reduction in depth of kitchen window to match sill height of bedroom 03 window, solar panel sizes corrected to match data sheets submitted with planning application, non-material amendment to permission BA/2025/0403/HOUSEH	Approve
Brundall Parish Council	BA/2026/0096/FUL	Windmill Harbour Riverside Estate Brundall Norfolk NR13 5PS	Mr James Fraser	Replacement of 137m of existing timber quay heading with steel piling, and GRP decking.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Burgh Castle Parish Council	BA/2026/0074/APPCON	Waveney Inn And River Centre Staithe Road Burgh St Peter Norfolk NR34 0DE	Mr Paul Spriggins	Details of: Condition 3: Landscape Details and Condition 10: Arboricultural Details of permission BA/2023/0076/FUL	Approve
Burgh Castle Parish Council	BA/2026/0080/HOUSEH	Cliff House Farm The Dell Butt Lane Burgh Castle Norfolk NR31 9AJ	Mr W Thrower	Removal of 3 outbuildings and construction of 2 new buildings that are required on site	Approve Subject to Conditions
Ditchingham Parish Council	BA/2025/0410/COND	Ditchingham Lodge Norwich Road Ditchingham Norfolk NR35 2JN	Mr Richard Stearn	Revised front terrace layout design, provision of matt black flue on rear elevation, 12mm thick Slimlite double glazing for all new joinery, variation of condition 2 of permission BA/2024/0242/COND (LBC)	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Ditchingham Parish Council	BA/2026/0019/COND	Ditchingham Lodge Norwich Road Ditchingham Norfolk NR35 2JN	Mr Richard Stearn	Revised front terrace layout design, provision of matt black flue on rear elevation, 12mm thick Slimlite double glazed units for all new joinery, variation of condition 2 of permission BA/2024/0239/COND	Approve Subject to Conditions
Freethorpe Parish Council	BA/2026/0112/LBC	1 Church Farm Cottages Church Road Wickhampton Norfolk NR13 3PB	Mr Campbell	Replacement of windows & French doors	Approve Subject to Conditions
Fritton With St Olaves Parish Council	BA/2026/0091/LBC	The Priory Beccles Road St Olaves Fritton And St Olaves Norfolk NR31 9HE	Mr Alastair Harvey	Infill late C20th doorway and removal of steps. Create new doorway for the same room.	Approve Subject to Conditions
Fritton With St Olaves Parish Council	BA/2026/0087/LBC	The Priory Beccles Road St Olaves Fritton And St Olaves Norfolk NR31 9HE	Mr Alastair Harvey	Installation of roof window	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Horning Parish Council	BA/2026/0034/FUL	Driftwood 104 Lower Street Horning Norfolk NR12 8PF	Mr John Atkins	Change of use of to allow short term holiday let accommodation	Refuse
Horning Parish Council	BA/2026/0052/ADV	The Swan Inn 10 Lower Street Horning Norfolk NR12 8AA	Mitchells And Butlers	Erection of illuminated & non-illuminated exterior signs	Approve Subject to Conditions
Hoveton Parish Council	BA/2025/0197/FUL	Whispering Willows Brimbelow Road Hoveton Norfolk NR12 8UJ	Mr & Mrs N Howard	Replacement dwellinghouse	Approve Subject to Conditions
Hoveton Parish Council	BA/2026/0123/HOUSEH	Dabchick Manor Brimbelow Road Hoveton Norfolk NR12 8UJ	Mr & Mrs Renshaw	Proposed single-storey extensions to detached dwelling, including new roof shape and finish	Approve Subject to Conditions
Ingham Parish Council	BA/2026/0010/COND	Causeway Farm Sea Palling Road Ingham Norfolk NR12 0TP	Mr & Mrs Goose	Removal of conditions 3 and 4 (Agricultural Occupancy Condition) of permission BA/2004/1371/HISTAP	Approve Subject to Conditions
Ludham Parish Council	BA/2026/0067/HOUSEH	The Pines Horsefen Road Ludham Norfolk NR29 5QG	Mrs Jane Wallis	Proposed side extension and extended decking	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Ludham Parish Council	BA/2026/0068/HOUSEH	Little Holland Horsefen Road Ludham Norfolk NR29 5QG	Mr Fred Rogers	Like-for-like replacement of 104m of timber quay-heading	Approve Subject to Conditions
Mettingham Parish Council	BA/2026/0113/COND	Mettingham House Beccles Road Mettingham Suffolk NR35 1TW	Mr & Mrs Schofield	Amendment to portico/porch design, variation of condition 2 of permission BA/2024/0247/HOUSEH	Approve Subject to Conditions
Mettingham Parish Council	BA/2026/0106/LBC	Mettingham House Beccles Road Mettingham Suffolk NR35 1TW	Mr & Mrs Schofield	Open porch	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2026/0095/FUL	John Lang Court Bridge Road Lowestoft Suffolk NR33 9LQ	Mrs Madison Mills	Replace 3no. external timber doors with aluminium doors	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2026/0122/HOUSEH	9 Marsh Road Lowestoft Suffolk NR33 9JY	Mr & Mrs Theaker	Remove front door and block up opening, install new side door and porch.	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2025/0279/LBC	153A Bridge Road Lowestoft Suffolk NR33 9JU	Mr Jan Simpson	Conversion of outbuilding to create dwelling	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Oulton Broad Parish Council	BA/2025/0041/FUL	153A Bridge Road Lowestoft Suffolk NR33 9JU	Mr Jan Simpson	Conversion of outbuilding to create dwelling	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2026/0021/HOUSEH	Chartwell Waveney Hill Lowestoft Suffolk NR32 3PR	Mrs Norma O'Dwyer	Replace timber windows with uPVC	Approve Subject to Conditions
Repps With Bastwick Parish Council	BA/2026/0101/HOUSEH	Raikon Tower Road Repps With Bastwick Norfolk NR29 5JW	Mr & Mrs Travis	Replacement of existing detached garage.	Approve Subject to Conditions
Rollesby Parish Council	BA/2026/0077/HOUSEH	Broads End Main Road Rollesby Norfolk NR29 5EG	Mr & Mrs Fabian	Proposed two storey side extension.	Approve Subject to Conditions
Stokesby With Herringby Parish Council	BA/2026/0118/NONMAT	Riverside House Mill Road Stokesby With Herringby Norfolk NR29 3EY	Mr & Mrs Rogan	Removal of one approved single-storey rear extensions (without balcony), single-storey link extension, and single bay cart lodge. Chimney to be retained, garage no longer to be converted. Changes to openings in rear elevation. Non-material amendment to permission BA/2024/0351/HOUSEH	Approve

Parish	Application	Site	Applicant	Proposal	Decision
Stokesby With Herringby Parish Council	BA/2026/0079/HOUSEH	Ferry Cottage The Green Mill Road (track) Stokesby With Herringby Norfolk NR29 3EX	Mr Mark Pollard	Replacement garden building	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: Steve Kenny

Date of report: 19 June 2026