

The Local Plan for the Broads: Review

Issues and Options consultation



July 2022

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Cover photo: Sunset over the Ant Valley (Tom Barrett)

1. Introduction

The Broads Authority has started the review of the Local Plan for the Broads. This first round of public consultation is the **Issues and Options** consultation.

There are several reasons why we are reviewing the Local Plan:

- We commit in the current Local Plan for the Broads to start the review around 18 months after adoption; 18 months after the May 2019 adoption is November 2020. Background work started in-house in November 2020, including project planning.
- The Local Plan 2019 was produced in line with, and examined against, the 2012 National Policy Planning Framework (NPPF). At around the time the final draft of the Local Plan was being consulted on, submitted and examined, a new version of the NPPF was released. This included transition arrangements for advanced Local Plans, such as that for the Broads, which permitted examination against the 'old' 2012 NPPF. It is prudent to now review the Local Plan, noting that the NPPF was updated in 2021.
- Given that the final drafting of the current Local Plan was at the end of 2017 (submitted early 2018, examined from mid-2018 and adopted May 2019), some of the issues that are addressed in the Local Plan, such as climate change, have moved on. Again, it is prudent to start to review the Local Plan to ensure it is as up to date as possible.

We do not include policies in this document; that will be for the next version of the Local Plan. This stage is about identifying issues and discussing options.

At this 'first steps' stage we want to know what you think about the Broads - what you value about it, what needs improvement, and what you feel are the key issues. We would also like your views on our current planning policies and how they are working.

2. About this consultation

The questions in this document are here to prompt and guide responses on the issues we think are most relevant to the new Local Plan. You don't have to answer them all, but please comment on any of relevance to you. Alternatively, if you want to respond more generally or cover other issues, then please email us at planningpolicy@broads-authority.gov.uk. The important thing is to tell us what you think – we want to hear from as many and as wide a range of people as possible.

This draft document and consultation process have been developed to adhere to the Broads Authority's Statement of Community Involvement (SCI)¹, which has been updated. The main changes to how we intend to consult on this document are as follows:

- If you wish to discuss the document, call 01603 610734 and ask to speak to Natalie Beal (Planning Policy Officer). You can also contact Natalie to request a video conference appointment.

¹ Current Statement of Community Involvement is here https://www.broads-authority.gov.uk/data/assets/pdf_file/0024/209337/Final_adopted_SCI_formatted_July_2020.pdf

- We will place hard copies of the consultation documents in libraries and Council offices as follows. **We recommend that you check with the venues about any access restrictions they may still have.**

Libraries: Acle, Beccles, Brundall, Bungay, Cromer, Great Yarmouth, Loddon, Lowestoft, Oulton Broad, Norwich Millennium, Stalham and Wroxham.

Council Offices: Broadland, Great Yarmouth, North Norfolk, South Norfolk, East Suffolk, Norfolk County and Suffolk County.

- Hard copies will be available at Yare House.
- We can send you hard copies of the documents on request – please contact Natalie on the above number. This service will initially be free, but if we get many requests we may have to consider charging for postage and printing.

Consultation on this document is for 10 weeks from xxxx

We will then read and respond to all comments received.

Please email your comments to: planningpolicy@broads-authority.gov.uk.

We are holding three drop-in events, where you can come and talk to Broads Authority staff. Please note that we will ask you to wear masks or face shields when attending these events.

Table 1:

Locations, dates and times of drop in events.

Date	12 September	14 September	17 September
Venue	Brundall Memorial Hall - Lounge	Oulton Community Centre - small hall	Potter Heigham Village Hall
Time	3-7pm	3-7pm	10am-1pm

Information provided by you in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), and the Environmental Information Regulations 2004). Please see [Appendix A](#) for the Privacy Notice. We will make your name and organisation public alongside your comment.

Please note that this consultation is being run alongside the consultation for the Design Guide for the Broads. **You can access that consultation document here.**

Are you satisfied that this consultation has followed the Consultation Principles? If not, or you have any other observations about how we can improve the process, please contact us at planningpolicy@broads-authority.gov.uk.

3. About Local Plans

Each local planning authority must prepare a Local Plan that sets the planning policies in its local area. The Local Plan is important when deciding planning applications, as all decisions must be made in accordance with its policies, unless there are strong reasons not to do so. Local plans must be positively prepared, justified, effective and consistent with national policy, in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the NPPF. Every local planning authority in England should have a clear, up-to-date Local Plan that conforms to the NPPF, meets local development needs and reflects local people's views on how they wish their community to develop.

The National Planning Policy Guidance (NPPG) usefully discusses what Local Plans are and what the legislative background is for producing them. It also talks generally about what they should include at [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/plan-making).

4. Timeline and stages for the production of the Local Plan for the Broads

The timeline for producing the Local Plan is set out in the [Local Development Scheme](#). Generally, however, these are the steps to reviewing/producing a Local Plan (the arrow shows the stage we have reached):

- Update the [Local Development Scheme](#) (completed).
- Update the [Statement of Community Involvement](#) (completed).
- Prepare [Sustainability Appraisal Scoping Report](#) and undertake technical consultation with certain stakeholders (completed).
- Review vision, objectives and policies (completed – in this document).
- ➔ • Consider issues in area and identify options to address these – **Issues and Options version of the Local Plan**. Produce Sustainability Appraisal and Habitats Regulation Assessment. Consult on this version (underway – in this document).
- Undertake call for sites for residential moorings and housing – if required.
- Produce evidence base as required (some completed - see [Local Plan evidence base to date](#)).
- Start to produce policies – **Preferred Options version of the Local Plan**. Produce Sustainability Appraisal. Produce Habitats Regulation Assessment. Consult on this version.
- Amend and finalise policies – **Publication version of the Local Plan**. Produce Sustainability Appraisal. Produce Habitats Regulation Assessment. Consult on this version.

- If still content with policies after assessing feedback on the Local Plan, submit to Planning Inspector. This is the **Submission stage**.
- **Examination**, including consultations as required.
- **Adopt** and monitor final Plan.

It is envisaged that it could take around 4 years to get to Submission stage for a Local Plan.

5. Sustainability Appraisal and Habitats Regulation Assessment

We have produced a Sustainability Appraisal (SA) Scoping Report and asked key stakeholders for their views – see [SA Scoping Report and comments](#).

We are aware that the Government is considering changing the approach to assessing local plans. The requirement to produce a SA and a Habitats Regulation Assessment (HRA) may be removed and another assessment may take their place. This was proposed in the 2020 Planning White Paper and further discussed in [Nature Recovery Green Paper: Protected Sites and Species](#). However, at the time of writing no such changes are in place and so, unless told otherwise, we will produce SAs and HRAs as appropriate.

Similarly, the UK has left the European Union (EU). The need to undertake SA and HRA originates from EU directives. EU law was transposed into UK law when we left the EU and so the requirement to undertake these assessments still exists. That being said, the Levelling Up and Regeneration Bill proposes replacing Environmental Impact and Strategic Environmental Assessments (Sustainability Appraisals) with a new set of Environmental Outcome Reports, with “a clearer and simpler process where relevant plans and projects are assessed against tangible environmental outcomes set by government.” We will ensure the local plan meets all requirements that are in place as it is produced.

The Sustainability Appraisal that accompanies this Issues and Options document can be found here: <insert link – Members, please note that you have this document within the papers.>.

The Habitats Regulations Assessment that accompanies this Issues and Options document can be found here: <insert link – Members, please note that you have this document within the papers.>.

6. Policy context

6.1 National Planning Policy Framework (NPPF) (2021)

The [National Planning Policy Framework](#) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

The NPPF is a comprehensive document which covers a range of issues. The key issues for the purposes of this report, setting out the broad context of plan making, are below.

Paragraph 11 sets out the presumption in favour of sustainable development:

11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

There are two footnotes that need to be read with paragraph 11.

Footnotes:

⁶ As established through statements of common ground (see paragraph 27).

⁷ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 180) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 67); and areas at risk of flooding or coastal change.

Paragraph 176 is contained within the section on conserving and enhancing the natural environment in the NPPF. It states:

176. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁵⁹. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Guidance and background on the National Parks and Broads is provided in a Circular and attention is drawn to this in Footnote 59:

Footnote:

⁵⁹ English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters.

Paragraph 177 goes on to say:

177. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

It is worth noting that ‘major development’ is not defined and footnote 60 makes it clear that this determination is a matter for the LPA:

Footnote:

⁶⁰ For the purposes of paragraphs 176 and 177, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

6.2 National Planning Policy Guidance (NPPG) (ongoing)

The [NPPG guidance](#) is intended to assist practitioners. Ultimately the interpretation of legislation is for the Courts, but this guidance is an indication of the Secretary of State’s

views. Planning practice guidance will be updated as needed. The guidance covers the following topics (as at April 2022):

- Advertisements
- Air quality
- Appeals
- Appropriate assessment
- Before submitting an application
- Brownfield land registers
- Build to rent
- Climate change
- Community Infrastructure Levy
- Consultation and pre-decision matters
- Crown development
- Design: process and tools
- Determining a planning application
- Effective use of land
- Enforcement and post-permission matters
- Environmental Impact Assessment
- Fees for planning applications
- Fire safety and high-rise residential buildings (from 1 August 2021)
- First Homes
- Flexible options for planning permissions
- Flood risk and coastal change
- Green Belt
- Hazardous substances
- Healthy and safe communities
- Historic environment
- Housing and economic land availability assessment
- Housing and economic needs assessment
- Housing needs of different groups
- Housing for older and disabled people
- Housing: optional technical standards
- Housing supply and delivery
- Land affected by contamination
- Land stability
- Lawful development certificates
- Light pollution
- Making an application
- Minerals
- Natural environment
- Neighbourhood planning
- Noise
- Open space, sports and recreation facilities, public rights of way and local green space
- Permission in principle
- Plan-making
- Planning obligations
- Renewable and low carbon energy
- Rural housing
- Self-build and custom housebuilding
- Strategic environmental assessment and sustainability appraisal
- Town centres and retail
- Transport evidence bases in plan making and decision taking
- Travel Plans, Transport Assessments and Statements

- Tree Preservation Orders and trees in conservation areas
- Use of planning conditions
- Viability
- Waste
- Water supply, wastewater and water quality
- When is permission required?

6.3 UK Marine Policy Statement (2011)

[The UK Marine Policy Statement](#) (MPS) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. The Marine and Coastal Access Act 2009 requires all public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area to do so in accordance with the MPS unless relevant considerations indicate otherwise.

6.4 East Inshore and Offshore Marine Plans (2014)

<https://www.gov.uk/government/publications/east-inshore-and-east-offshore-marine-plans>

The East Inshore Marine Plan area includes the coastline stretching from Flamborough Head to Felixstowe, extending from mean high water out to 12 nautical miles, including inland areas such as the Broads and other waters subject to tidal influence, and covers an area of 6,000 square kilometres. The East Offshore Marine Plan area covers the marine area from 12 nautical miles out to the maritime borders with the Netherlands, Belgium and France, a total of approximately 49,000 square kilometres of sea.

Vision for East Marine Plan Areas in 2034: By 2034 sustainable, effective and efficient use of the East Inshore and East Offshore Marine Plan Areas has been achieved, leading to economic development while protecting and enhancing the marine and coastal environment, offering local communities new jobs, improved health and wellbeing. As a result of an integrated approach that respects other sectors and interests, the East Marine Plan areas are providing a significant contribution, particularly through offshore wind, to the energy generated in the United Kingdom and to targets on climate change.

6.5 National Parks Circular (2010)

While the National Parks and the Broads are established under two separate Acts of Parliament, the similarities between them are such that this [National Parks Circular](#) applies equally to them all. It sets out:

- a vision for the English National Parks and the Broads for 2030;
- the key outcomes the Government is seeking over the next five years to ensure early progress towards the vision and suggested actions for achieving those outcomes;
- the key statutory duties of the National Park Authorities ('NPAs') and the Broads Authority (together 'the Authorities') and how they should be taken forward;
- policy on governance of the Authorities;
- the contributions needed from others.

Vision for the English National Parks and the Broads:

By 2030 English National Parks and the Broads will be places where:

- There are thriving, living, working landscapes notable for their natural beauty and cultural heritage. They inspire visitors and local communities to live within environmental limits and to tackle climate change. The wide-range of services they provide (from clean water to sustainable food) are in good condition and valued by society.
- Sustainable development can be seen in action. The communities of the Parks take an active part in decisions about their future. They are known for having been pivotal in the transformation to a low carbon society and sustainable living. Renewable energy, sustainable agriculture, low carbon transport and travel and healthy, prosperous communities have long been the norm.
- Wildlife flourishes and habitats are maintained, restored and expanded and linked effectively to other ecological networks. Woodland cover has increased and all woodlands are sustainably managed, with the right trees in the right places. Landscapes and habitats are managed to create resilience and enable adaptation.
- Everyone can discover the rich variety of England's natural and historic environment, and have the chance to value them as places for escape, adventure, enjoyment, inspiration and reflection, and a source of national pride and identity. They will be recognised as fundamental to our prosperity and wellbeing.

6.6 Broads Plan 2017

The [Broads Plan](#) is the key strategic management plan for the Broads. It sets out a vision, aims and objectives for the Broads and coordinates and integrates a wide range of strategies, plans and policies relevant to the area with the purposes and duties set out in the Broads Acts.

Three fundamental principles help guide the development and implementation of the Broads Plan. The first is based on the definition of the Precautionary Approach in the Rio Declaration on Environment and Development, 1992. The second recognises the need for integrated, long-term management, and the third underlines the importance of informed partnership working.

Principle 1

Where there are likely threats of serious or irreversible damage to the environment, as a precaution, cost effective measures are taken to prevent environmental degradation in the absence of full scientific certainty of the outcome of such threats. Such precautionary action is based on assessment of the costs and benefits of action, taking into account both the proportionality between the costs and benefits and the degree of certainty in their calculation, and transparency in decision making. Gaps in knowledge are addressed by research and, where feasible, precautionary measures taken while such knowledge is outstanding.

Principle 2

We seek to understand and respect the complexity and biological limits of our ecosystems, and conserve their structures to maintain their health and productivity. Management is at a local scale, while recognizing the direct or indirect effects on wider, interconnected

ecosystems and the public goods and services they provide. We manage for long-term, multiple benefits, not just for short-term or single interest gains.

Principle 3

We plan and work in partnership to make the best use of shared knowledge and resources and to avoid duplication of effort. People are involved from an early stage, and throughout, in decisions that may interest or affect them. Decisions are supported with robust evidence, including scientific and local knowledge, innovation and best practice.

The Broads Authority is required to review the Broads Plan at least every five years. The current Broads Plan (2017) will be updated in 2022 and was subject to consultation in May and June 2022.

6.7 Current Broads Planning Policy Documents

- [Local Plan for the Broads](#) – adopted in 2019
- [Flood Risk SPD](#) – adopted in 2020; elaborates on Local Plan flood risk policies
- [Topic based guides](#) – guides to help implement policies of the Local Plan

6.8 Neighbouring Local Planning Authority Planning Policy Documents

The Broads Authority is the Local Planning Authority for the Broads Executive Area. Parts of the Broads area cover Norwich City, Broadland, South Norfolk, North Norfolk, Great Yarmouth Borough and East Suffolk District Council areas. These districts are the Local Planning Authorities for the remainder of their areas. The Broads area is within the counties of Norfolk and Suffolk and the respective County Councils produce minerals and waste planning policy documents.

As the Local Plan for the Broads is developed, it is important to be aware of the proposals and policies of the districts and counties.

6.9 Norfolk Strategic Planning Framework (NSPF) (2021)

Norfolk Local Planning Authorities have produced a [Norfolk Strategic Planning Framework](#) (NSPF) to ensure that planning is undertaken strategically and the requirements of the Duty to Cooperate are met. The NSPF also meets the requirement to produce a Statement of Common Ground. All Local Planning Authorities in Norfolk have worked together to produce this work. The Framework identifies cross boundary and strategic issues and seeks ways to recommend to the Authorities on how to address these issues in a coordinated manner.

6.10 Neighbourhood Plans

At the time of writing (July 2022), the following Neighbourhood Plans were adopted or in preparation:

Adopted: Acle, Beccles, Brundall, Filby, Rollesby, Salhouse, Strumpshaw, Winterton on Sea and Wroxham.

In preparation: Barnby, Bungay, Carlton Colville, Fleggburgh, Hemsby, Horstead with Stanninghall, Loddon and Chedgrave, Lound with Ashby, Herringfleet and Somerleyton,

Mettingham, Barsham and Shipmeadow and Ringsfield and Weston, Oulton, Oulton Broad, Reedham, Stalham, Thorpe St Andrew, Trowse with Newton, Worlingham.

6.11 Biodiversity Net Gain (BNG)

The Biodiversity Net Gain (BNG) requirement was introduced in the [Environment Act](#), which was passed in November

2021 and is set to become mandatory in November 2023. This is a requirement that is set nationally. It will require developers to demonstrate how they will bring about a minimum 10% increase in biodiversity in order to obtain planning permission for their projects. Under the Act, the necessary habitat enhancement will be paid for by the developer and must be guaranteed to endure for 30 years.

During the start of 2022, the Government ran a [public consultation on the BNG](#) giving details on how it can work, as well as any exemptions.

The Broads Authority will keep informed of progress as the BNG process becomes more formalised. In the meantime, some Neighbourhood Plans introduce a requirement for BNG for their Neighbourhood Area, and we will work on implementing the policy requirements.

6.12 Nutrient neutrality

In freshwater habitats and estuaries, poor water quality due to nutrient enrichment from elevated nitrogen and phosphorus levels is one of the primary reasons for habitats sites being in 'unfavourable condition'. Excessive levels of nutrients can cause the rapid growth of certain plants through the process of eutrophication. The effects of this look different depending on the habitat but, in each case, there is a loss of biodiversity leading to sites being in unfavourable condition.

To achieve the necessary improvements in water quality, it is becoming increasingly evident that, in many cases, substantial reductions in nutrients are needed. In addition, for habitats sites that are unfavourable due to nutrients, and where there is considerable development pressure, mitigation solutions are likely to be needed to enable new development to proceed without causing further harm.

In light of this serious nutrient issue, Natural England has recently reviewed its advice on the impact of nutrients on habitats sites which are already in unfavourable condition. It is now advising that there is a risk of significant effects in more cases where habitats sites are in unfavourable condition due to exceeded nutrient thresholds. More plans and projects are therefore likely to proceed to appropriate assessment.

Mitigation through nutrient neutrality offers a potential solution. Nutrient neutrality is an approach which enables decision makers to assess and quantify mitigation requirements of new developments. It allows new developments to be approved with no net increase in nutrient loading within the catchments of the affected habitats site.

Where properly applied, Natural England considers that nutrient neutrality is an acceptable means of counterbalancing nutrient impacts from development to demonstrate no adverse effect on the integrity of habitats sites and they have provided guidance.

The Nutrient Neutrality Methodology enables a nutrient budget to be calculated for all types of development that would result in a net increase in population served by a wastewater system.

It covers all types of overnight accommodation including new homes, student accommodation, care homes, tourism attractions and tourist accommodation and permitted development (which gives rise to new overnight accommodation) under the Town and Country Planning (General Permitted Development) (England) Order 20159.

We are working with other Norfolk Local Planning Authorities on how to address this issue.

6.13 Recreation Avoidance Mitigation Strategy (RAMS)

New development can impact on protected wildlife sites in many ways. One such way is through the impact of recreational activities. Evidence indicates that new development in Norfolk is likely to affect the integrity of protected sites in Norfolk. In parts of Suffolk, evidence also indicates that development is likely to affect the integrity of protected sites on the Suffolk Coast. The payment of a tariff by applicants would enable the funding of measures to help mitigate impacts of recreational activities arising from development.

The requirements of Suffolk Coast RAMS apply to all new residential developments where there is a net increase in dwelling numbers. This includes, for example, the conversion of houses into smaller flats, or the change of use of other buildings to dwellings. It also includes new tourist accommodation. It excludes replacement dwellings and extensions to existing dwellings (where there is no net gain in dwelling numbers). The tariff, at the time of writing, for the area in which the Broads falls is £321.22. More background information can be found at [Habitat mitigation \(RAMS\) » East Suffolk Council](#).

The following schemes are part of the Norfolk RAMS scheme and will need to pay the tariff:

- new dwellings of 1+ units (but excludes replacement dwellings and extensions)
- Housing in Multiple Occupancy (HMO)
- student accommodation
- residential care homes and residential institutions
- tourist accommodation including caravan sites, camping and glamping, and
- Gypsies, Travellers and Travelling Showpeople plots
- Residential moorings are also included, as well as tourist accommodation on recommended rate of 'per six bed-space ratio' of the tariff

The tariff (at the time of writing) is around £185. This will be index linked and increase with inflation.

7. About the Broads

7.1 Introduction

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

7.2 How the Broads was formed

From around the 11th century, the demand for timber and fuel was so high that most woodland was felled, and the growing population began digging the peat in the river valleys to provide a suitable fuel alternative. Rising sea levels then flooded these early peat diggings and, despite numerous drainage attempts, the flooding continued and the shallow lakes or 'broads' we see today were formed. You can see an interactive webpage about the Broads at [Journey \(broads-authority.gov.uk\)](http://Journey(broads-authority.gov.uk))

7.3 The Broads Authority

The Broads Authority is a Special Statutory Authority established under the [Norfolk and Suffolk Broads Act 1988](#)². It has a statutory duty to manage the Broads for three purposes, none of which takes precedence:

- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
- Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
- Protecting the interests of navigation.

Additionally, in discharging its functions, the Broads Authority must have regard to:

- The national importance of the Broads as an area of natural beauty and one which affords opportunities for open-air recreation;
- The desirability of protecting the natural resources of the Broads from damage; and
- The needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads.

² [Broads Authority Act 2009](#) is also of importance.

The Broads Authority is the Local Planning Authority for the Broads. It is responsible for producing this Local Plan, which guides development in the area and is used in determining planning applications.

A primary aspect of the Broads is that it is a nationally designated area, protected and enhanced for the benefit of the nation as well as for the local population and businesses. This is the justification for control of local planning within the designated area to be entrusted to a special purpose body that includes representation of the national interest as well as of local councils and navigators.

7.4 The Broads Authority Executive Area

The designated Broads Authority Executive Area covers parts of Norfolk and North Suffolk, as shown in white in Map 1³. The area includes parts of Broadland District, South Norfolk District, North Norfolk District, Great Yarmouth Borough, Norwich City, and East Suffolk Council area. The councils for those areas do not have planning powers in the Broads area, but retain all other local authority powers and responsibilities. Norfolk County Council and Suffolk County Council are the county planning authority for their respective part of the Broads, with responsibilities that include minerals and waste planning, and are also the Lead Local Flood Authority. The Broads does not sit in isolation; there are important linkages with neighbouring areas in terms of the community and economy – what happens outside the Broads affects the area, and vice versa.

Map 1: Broads Authority Executive Area



³ Map 1 © Crown copyright and database rights 2016. Ordnance Survey 100021573

A map of the Broads with more information is on p2 of [Broadcaster 2022 by Countrywide Publications](#)

7.5 The landscape of the Broads

The Broads is much changed by people over time, and is of international historic and cultural significance. Having been awarded status equivalent to a national park, the highest status of protection is conferred upon the area's landscape and natural beauty.

The Broads is a low-lying wetland mosaic of flooded former peat workings (shallow lakes or 'broads') of various sizes, river channels, reed swamp, fen, reedbed, carr woodland and drained grazing marsh, arable cultivation with some heath and sand dune. It also includes a small stretch of undeveloped coastline near Horsey and Winterton.

Traditional settlements tend to be on slightly higher ground, with extensive areas of reed beds, grazing marsh and some carr woodland in and on the edges of the floodplain. There is no general building vernacular, but the traditional villages tend to have a variety of surviving older buildings that may have similar characteristics and be of considerable quality or interest. These settlements are usually clustered near a staithe (traditional landing area), either on a river or connected to it by dyke, and surrounded by more modern housing of no particular distinction. That being said, the vernacular of the Broads is evolving. The Broads Authority is open to the potential for modern design that may contribute to the future cultural heritage of the Broads.

On the riverside, around staithes and along the few road accesses to the waterside, are often strings of chalets/bungalows and sometimes grander houses. These display a distinctive palette of a progression of early 20th century architectural styles, including versions of Arts and Crafts, Cottage *ornée* and mock Tudor particular to the area. There are also boatyards, with buildings of a more utilitarian and industrial character, together with boat mooring basins cut into the marshes, both visually enlivened by boats and their to-ing and fro-ing. These centres of population can be crowded and busy in summer, but population elsewhere in the Broads is sparse.

Drainage mills and isolated farmhouses sparingly punctuate views across the marshland, and the relative absence of fences (because dykes and drains divide the marshes that contain grazing cattle) accentuates its open, flat and empty appearance. Boats, birds, cattle, field gates, willow pollards and reed-fringed ditches are also important features across the area.

It is a landscape of contrast and surprise, with rivers and broads often concealed from immediate view by carr woodland, or extensive views across marshes to distant woodland and settlements, with the presence of an intervening river often only revealed by the procession of a boat's sail in the middle ground. With its limited road and rail system, much of the Broads feels surprisingly remote and isolated, although footpaths cross the area and boat access is extensive.

It is clear that the unique and special landscape of the Broads is an important asset that many people appreciate and value; indeed, it is the landscape that many visitors come to enjoy. The Local Plan needs to protect and enhance this landscape.

7.6 The economy of the Broads

Tourism is the mainstay of the Broads' economy. In 2019, the Broads and surrounding area (including the area of influence) received around 8.1 million visitors, bringing in an estimated £490 million and directly supporting more than 7,435 FTE jobs⁴. The STEAM data for 2020 compares some indicators in 2020 to the same indicators in 2019. As we know, there were lockdowns and restrictions of access and movement during much of 2020 due to Covid-19 and the data for 2020 reflects this; for example, visitor numbers for all visitor types were c.13 million in 2019 and down to c.7 million in 2020. The data overall tends to show that 2020 was 42% down on 2019. Anecdotally, however, periods between lockdowns were fairly intense with visitors.

Land and water-based tourism is hugely important in the area. There were around 12,071 registered boats on the Broads in 2019 (10,602 private craft and 1,469 hire craft); many people also enjoy bird watching, walking, cycling, angling, visiting heritage sites and just being near the water.

Traditional skills and industry are important to the area. Reed and Sedge Cutters, Thatchers and Millwrights for example, all have an important part to play in the Broads.

Boatyards and other waterside businesses are critical to the enjoyment of the area by tourists and local residents alike, and to the local economy and employment. Although many people come to the Broads as day visitors, provision of holiday accommodation, including a variety of types and locations, is important.

The local economy is not entirely tourism related. Agriculture is the predominant business use in terms of land area, if not in numbers employed or monetary value, and has a vital role in maintaining the landscape and its aesthetic and environmental value. Boat building is also a locally important traditional industry.

Other businesses in the Broads are diverse and tend to be small scale and service related, a notable exception being the large sugar beet processing plant at Cantley on the River Yare.

The Local Plan needs to ensure that the local economy, most of which is rural-based, can continue to thrive. The impacts of Covid-19 restrictions on businesses will be important to understand, although it could be that the country bounces back to some extent now that restrictions have eased and the majority of the population is vaccinated.

7.7 The natural environment of the Broads

The Broads is one of Europe's most important wetlands for biodiversity and nature conservation. It is a predominantly freshwater ecosystem made up of meandering rivers connecting beautiful expanses of shallow water known as 'broads'. The surrounding habitats include botanically rich fens, home to the rare Swallowtail Butterfly, Norfolk Hawker Dragonfly and Bittern. The invertebrate and bird rich wet woodlands, and the grazing marshes with their network of unique aquatic plant and animal ditch communities, make

⁴ STEAM Report: Volume and Value of Tourism in the Broads 2019

the Broads one of the most wildlife rich areas in the National Park family and in the UK. The great importance for biodiversity is reflected in records for the Broads, which indicate:

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

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

In early 2022, the Broads Authority endorsed the Recreation Impact Avoidance and Mitigation Strategies for Norfolk and Suffolk Coast. The aim of these strategies is that by collecting tariff from overnight accommodation, the funding can be spent strategically to mitigate the impacts of development on protected sites.

In March 2022, the issue of the impact of phosphates and nitrogen on the water quality of protected sites in the Broads SAC and RAMSAR Sites led to the Norfolk LPAs working together to introduce 'Nutrient Neutrality'. This work is at its early stages at the time of writing, but permissions for some development in some areas have been delayed.

The Broads is an important area for biodiversity. It is also one of the reasons why people live here and tourists come to visit. We need to ensure we understand how development can impact biodiversity so we protect it and look for opportunities to expand and connect habitats, and that we reflect this in the Local Plan.

7.8 Historic environment and culture of the Broads

The unique quality and distinctiveness of the built environment of the area, its drainage mills, river and waterside settlements and its origins as man-made medieval peat diggings makes the Broads itself arguably one of England's most extensive industrial monuments. Collectively these features provide the context for individual sites of built and archaeological interest, resulting in a true cultural landscape.

The Broads Authority Executive Area contains over 270 Nationally Listed Buildings, 15 Scheduled Monuments and 25 Conservation Areas. The area has been identified by Historic

England as being a site of exceptional potential for waterlogged archaeology, and the Broads Authority maintains a Local List of heritage assets. The Broads is also home to numerous heritage craft including the famous trading wherries, other historic sailing and motor vessels.

The cultural assets of the Broads are a fragile, precious and finite resource. While the cultural value of the area can be added to by outstanding new design, its past is documented by the historic environment. It is important that policies are in place to protect, enhance and better understand the historic environment and cultural landscape of the Broads.

It is not only the buildings and the broads that reflect the history of the Broads; so too do the boats (see later) and the traditional skills and industries such as boat building, reed and sedge cutting, millwrighting and thatching.

The Broads is clearly steeped in history, with many important heritage assets. These assets need protecting and appropriately enhancing, and this needs to be reflected in the Local Plan.

7.9 Navigating the Broads

One of the Broads Authority's statutory purposes is to protect the interests of navigation. The Broads is one of the most extensive and varied inland waterway systems in the UK, offering 200km of boating on lock-free tidal rivers. The navigation reaches from the quiet headwaters of the Bure, Ant, Thurne and Waveney to the bustling centre of Norwich and coastal resorts of Great Yarmouth and Lowestoft. The North Walsham and Dilham Canal is partly within the Broads and is a heritage canal.

The Broads Authority Executive Area comprises approximately 3113 ha of water space, including 63 permanently open water bodies covering 843 ha. Many of these water bodies are broads in the traditional sense, having been formed from medieval peat diggings and used as water transport routes linking settlements with the main rivers and tributaries. Others are of more recent and/or different origin, such as at Whitlingham Country Park, which was developed on the site of a gravel quarry. Some broads have public navigation rights, others have more limited access, generally for environmental or land ownership reasons, while some others are landlocked and inaccessible to craft.

As a harbour and navigation authority, the Authority is responsible for the maintenance of the navigation on the waterways, which is entirely funded through income generated by boat tolls. Its duties include health and safety provisions, dredging, management of vegetation, clearance of wrecks and other hazards, signing and marking the waterways, maintaining the network of free 24-hour moorings and providing a ranger service to assist the public and enforce the byelaws, particularly speed limits.

The Broads has been used for navigation for a long time. Navigation is fundamental to the local economy and provides varied health and wellbeing benefits. The Local Plan will need to ensure that navigation is protected and appropriately enhanced.

7.10 The boats and people who sail them

Visitors taking to the network of rivers and broads find themselves sharing the water space with many types of vessels. These range from heritage sailing river cruisers, canoes and paddle boards to period launches and day boats, some propelled by steam, and dozens of types of nationally and internationally recognised racing/sailing dinghies. There are also the restored and maintained traditional trading wherries and leisure wherries. Boats are hired by the day or week, or are privately owned. Boat building, chandlery and repair are significant local industries. This rich boating heritage is probably unrivalled anywhere in the world. The commitment of local people to heritage boats and boating on the Broads is shown in the more than 50 voluntarily run clubs and classes affiliated to the Norfolk and Suffolk Boating Association.

Boating is a key part of the local economy and has many interrelated land uses that the Local Plan will need to understand and address.

7.11 The community of the Broads

The resident population of the Broads Authority Executive Area is about 6,500 people. Living in the Broads, particularly close to the water, is highly prized and this is reflected in local house prices. Local communities strongly identify with the area and value its special qualities. The Executive Area covers parts of more than 90 parishes in Norfolk and Suffolk (see [Appendix 2](#)).

The National Census 2011⁵ gives these facts and figures about the community of the Broads: **6,271** people live here, **49.8%** male and **50.2%** female. The mean age of the population is **49.3**, and the **majority** work full time or are retired. **Most** identify their health as good or very good, with **9.6%** reporting a long-term health problem or disability that limits their day to day activities 'a lot'. The Broads has a population density of **0.2 people per hectare**, and the number of households increased by **307** between 2001 and 2011.

The 2019 Indices of Multiple Deprivation (IMD) give an interesting insight into the community of the Broads. The IMD maps for the Broads have been assessed as part of a Deprivation Topic Paper⁶.

Many settlements are split between two Local Planning Authorities, so the Broads Authority needs to ensure that it works with its neighbouring LPAs. The community is an important asset to the area, and its needs will need to be addressed in the Local Plan.

7.12 Pressures on the Broads

The Broads is a fragile wetland. It is under increasing pressure from a variety of sources, including development both within and adjacent to the Executive Area. In the last century, habitat loss and fragmentation, impact from recreation activities, nutrient enrichment and pollution of the waterways, and increasing threats from non-native species have seen a decline in species and habitats. The [Broads Plan](#) and the [Broads Biodiversity Action Plan](#) commit the Authority and its partners to halting and reversing this decline in the Broads.

⁵ The most recent Census was held in early 2021. Over time, more findings of the Census will be released and this section will be updated.

⁶ https://www.broads-authority.gov.uk/data/assets/pdf_file/0021/409035/The-Index-of-Multiple-Deprivation-Topic-Paper-2021-formatted.pdf

Sea level rise and the impacts of a changing climate and pressure on water resources related to new development will also increase pressure on the Broads over time.

The Broads is a popular place to live in and to visit, but with so many important assets such as heritage, landscape and biodiversity, there is the potential for harm to be caused. The Local Plan needs to understand and address the pressures on these assets.

7.13 Access and recreation

As the UK's premier wetland, with status equivalent to a National Park and internationally recognised for its landscape, nature conservation and cultural features, the Broads is a popular recreational destination, with miles of open water space and natural, historic and cultural assets to be explored and enjoyed.

Because of its wetland landscape, many parts of the Broads are most easily accessible by water, with the unique experience this brings. It is one of the most extensive inland waterways in the UK, and boating is a major recreational activity, with around 12,000 licensed craft using the navigation area.

There are also recreational opportunities to be enjoyed on land. The area has an extensive rights of way network, with around 303km of public footpaths and 17km of public bridleways available for public use. There are three promoted long-distance routes and a number of circular walks and cycle routes in the area. Approximately 150ha of land in the Broads has been designated as open access land under the Countryside and Rights of Way Act 2000. The Broads is also one of the most popular areas in the UK for angling.

Good access and recreation provision in the Broads contributes to the health and wellbeing of local and neighbouring communities and visitors, and is especially important for urban dwellers and people from deprived communities.

Question 1: Do you have any comments on the 'About the Broads' section?

8. Duty to Cooperate

8.1 The Duty

The Duty to Cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on Local Planning Authorities, County Councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.

The Duty to Cooperate is not a duty to agree. However, Local Planning Authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination. Local Planning Authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. If a Local Planning Authority cannot demonstrate that it has complied with the duty then the Local Plan will not be able to proceed further in examination.

The Localism Act states that relevant bodies must '*...engage constructively, actively and on an ongoing basis...*'.

8.2 How the Broads Authority meets the Duty

The Broads Authority meets the Duty to Cooperate in a number of ways (please note this list is not exhaustive, but gives a flavour of our activity):

- Commissions joint evidence bases, e.g. the Norfolk Recreational Impact Study and the Norfolk Older Persons Strategy.
- Regular officer level meetings, e.g. the Norfolk Strategic Planning Officers Group (attended by the Environment Agency), the Suffolk Planning Policy and Development Management Officers Group.
- Quarterly meetings with Great Yarmouth Borough Council and East Suffolk District Council.
- Production of Norfolk Strategic Planning Framework/Statement of Common Ground.
- Quarterly Norfolk Duty to Cooperate Member Group meetings.
- A member from each of the Authority's constituent districts sits on the Broads Authority's Planning Committee.
- Individual meetings with the Planning Policy Teams of the Authority's constituent districts.

The Authority therefore considers that it engages constructively and on an ongoing basis with relevant authorities. As the Local Plan progresses through the next stages of production, draft statements covering how the Authority has met the requirements of the Duty to Cooperate will be produced.

8.3 Planning White Paper and Levelling Up Bill

The 2020 Planning White Paper suggested that the Duty to Cooperate could be removed, “although further consideration will be given to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared in areas with significant strategic challenges”. These changes are not in place yet, so we will continue to cooperate and produce the necessary statements until the requirement changes.

The removal of the Duty to Cooperate is proposed in the Levelling Up and Regeneration Bill which includes ‘a requirement to assist’ with plan-making, replacing the current ‘Duty to Cooperate.’ This means that ‘the prescribed public bodies’ who influence the delivery and planning of infrastructure are required to be involved in the plan-making process and, according to the guidance note must do everything asked by the plan making authorities, within reason.

Question 2: Do you have any thoughts on the Authority’s approach to Duty to Cooperate?

9. The Broads: Strengths, weaknesses, opportunities, threats

9.1 Introduction

In this section, we carry out a 'SWOT' analysis that identifies some of the principal sustainability strengths, weaknesses, opportunities and threats that are potentially relevant to the Broads Plan (the strategic management plan for the Broads) and to the Local Plan for the Broads.

9.2 Strengths

- a) Extensive, diverse and very highly valued landscape, habitats, flora, fauna and cultural and heritage assets.
- b) A unique wetland and low-lying area and status equivalent to a National Park.
- c) Formal nature conservation designations of the Broads and many areas within it provide relatively high levels of policy protection or conservation.
- d) Farmed and managed landscape, the majority being privately owned.
- e) A short undeveloped stretch of coastline.
- f) High levels of tranquillity through much of the Broads; in particular, a sense of remoteness in some parts despite these being located close to concentrations of housing and industry. Also, most of the area has intrinsic dark skies.
- g) Attractive environment, providing the basis for most of the Broads' economy and recreation for residents and visitors.
- h) Britain's largest protected wetland and third largest inland waterway.
- i) High level of interaction with the surrounding area, with complementary provision of facilities and opportunities. For example, employment and development opportunities and community facilities in surrounding districts, towns and in Norwich also serve Broads' residents, while the Broads provides recreational and business opportunities to those from the wider area.
- j) Thriving hire boat industry contributing to the local economy.
- k) Many organisations and individuals caring for or promoting the value of various aspects of the Broads.
- l) Importance of the Broads for the identity and recreation of a much wider area.
- m) The age profile of the area shows more older people than in the surrounding area. Older people are often motivated, educated and experienced and play an important role in the community.
- n) Substantial, engaged community of private boat owners.
- o) Local boating clubs and classes that enable local people (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors.
- p) Many heritage assets, including conservation areas and drainage mills.
- q) The international significance of the paleo-archaeological remains within the Broads and the unusually well-preserved organic remains.

- r) A wealth of archaeological deposits that are not well represented elsewhere within the country.
- s) Good collaborative working with stakeholders and interest groups.
- t) An area providing many ecosystem services, as evidenced in the Norfolk and Suffolk natural capital assets compendium⁷.
- u) Peatland areas and opportunities for improved wetland areas, carbon storage, holding flood waters, storing water for droughts, nature enchantment.

9.3 Weaknesses

- a) Many of the protected habitats failing to meet target ecological conditions and/or vulnerable to change as a result of, for example, fragmentation, inappropriate water and land management and pressure from nearby development.
- b) Lowland grazing economics poor and may be at risk of farm subsidy changes.
- c) Some areas of fen and all lakes and rivers in unfavourable condition and some are in declining condition and reliant on public grants for Nature Recovery.
- d) Almost the whole of the Broads area subject to, or at risk of, flooding.
- e) Some listed buildings and other heritage assets at risk, and particular problems in finding compatible and beneficial uses that could help secure the restoration and maintenance of heritage assets such as wind pumps/drainage mills.
- f) Continuing (though declining) problems of water quality in the rivers; ground water quality problems.
- g) Difficulty of modernising and adapting existing buildings and uses, and accommodating new ones, due to flood prone nature of the area.
- h) Decline in traditional industries such as millwrights, thatchers and reed and sedge cutters.
- i) High reliance on tourism, which can leave the economy vulnerable and mean a loss of resilience as a result of changes to the holiday/recreational patterns. Indeed, the access restrictions as a result of COVID19 has had a large impact on tourism (as well as many other sectors of the local and national economy).
- j) Car dependence of local communities and businesses and fragmentation of settlements.
- k) Depleted local community and/or visitor facilities, often through displacement by higher value activities (principally housing).
- l) Tensions and perceptions of incompatibility between interests of conservation, farming, development, recreation, tourism, navigation and local communities, and between local interests and the national value of the Broads.
- m) The ageing population could lead to imbalance in the community.
- n) Lack of housing that is affordable resulting in some people having to commute to places of work.
- o) Deficiencies of moorings in some places to meet the needs of various water space users.

⁷ [Norfolk and Suffolk Natural Capital Assets Evidence Compendium | Norfolk Biodiversity Information Service \(nbis.org.uk\)](https://nbis.org.uk)

- p) Some low bridges which prevent larger boats from passing, and some narrow waterways which could limit potential for navigation.
- q) Some boats unable to navigate as intended due to operational issues of some swing bridges, particular when the weather is hot.
- r) Increasing pressures for land use change around areas of settlement.
- s) Resourcing difficulties for organisations that help to manage the environmental assets.
- t) Lack of certainty of how the new framework for agricultural subsidies will support Nature Recovery.
- u) Lack of public transport in rural areas
- v) Rural connectivity – some areas not covered by broadband.
- w) Unsustainable wildfowling.
- x) Increased risk of salinisation of previously freshwater wetlands.
- y) Capacity to adapt to climate change impacts such as sea level rise and significant habitat change

9.4 Opportunities

- a) Climate change:
 - i. Likely impacts that may create opportunities such as changes in flora, fauna and landscape, patterns of recreation and changes in agriculture and its practices.
 - ii. Adaption through erecting, raising and strengthening flood defences, realignment in more flood prone locations to make more space for water and linking wildlife habitats to provide resilience.
 - iii. Evolving low carbon lifestyles, construction and patterns of land use and settlement.
 - iv. Opportunities to link with other strategic initiatives (Local Nature Recovery Strategies etc) to build in nature-based solutions for climate change adaptation
- b) Maintaining the recovery and improvement of water quality achieved over the last few decades by long-term and ongoing investment across a range of agencies, particularly water companies.
- c) Potential to put in place environmental and recreational management measures as part of the implementation of major housing and employment growth outside but close to the Broads area.
- d) Potential for restoration and enhancement zones towards nature recovery within and surrounding the Broads, including to connect up to coastal and other biodiversity rich wetland areas.
- e) Potential for revival in the use of the area's rivers and railways for freight and passenger traffic.
- f) Changes in patterns of recreation and expectations of visitors.
- g) Potential for complementary and mutually supportive actions and benefits across environmental, recreational, navigation, and local community issues.

- h) Provision of jobs, facilities, services and homes for local residents through the development plans of constituent Local Authorities.
- i) The status of the Broads as equivalent to a National Park – held in high regard with most stakeholders.
- j) Private investment opportunities for carbon, water quality and potentially Biodiversity Net Gain.
- k) Training opportunities for traditional skills and crafts.
- l) Encouraging sustainability through the design of buildings as well as innovative designs, new technologies and building in resilience.
- m) Opportunities to encourage both local residents and visitors to join one of the many boating clubs, take part in organised events, go on formal sailing courses and gain recognised Royal Yachting Association (RYA) qualifications.
- n) Opportunities to Improve awareness of general public and residents of the special qualities of the Broads (see section 5.2).
- o) Many train stations in/near to the Broads.
- p) Highway improvements and the benefits to the community and economy they could bring.
- q) Flat land favouring healthy travel modes and active travel opportunities.
- r) As a consequence of the COVID19 pandemic, more people will /may holiday in the UK and in the Broads and become aware of the special qualities of the Broads. Businesses could appropriately diversify and become more resilient.
- s) More home-based working lessening carbon impacts while retaining wealth in the locality.
- t) Opportunities for natural flood management to minimise impacts of coastal flood management, creating new habitats that help to mitigate the impacts of a changing climate i.e. coastal flooding and saltwater incursion. Sensitive/natural approach would have benefits for wildlife and people.
- u) Agricultural subsidy change, as the Broads is able to achieve so many benefits
- v) Protection and appropriate enhancement of heritage assets.

9.5 Threats

- a) Climate change - likely impacts that may be threats:
 - i. Increased frequency and severity of all sources of flooding
 - ii. Increased risk of coastal inundation
 - iii. Increased frequency and severity of drought, with impact on water resources available to all sectors
 - iv. Severe drought would affect the ability to graze marshes with livestock
 - v. Deterioration of water quality and abstraction of water resources
 - vi. Increased frequency and severity of saline incursion into fresh water systems
 - vii. Loss of freshwater dependant flora, fauna and landscape in some areas

- viii. Changes in patterns of recreation
- ix. Changes in agriculture and its practices including large scale horse grazing
- b) Redundancy/degradation of infrastructure and material assets
- c) Erosion of the special character of the area's landscape and built heritage through:
 - i. Loss of archaeology built/landscape and cultural heritage assets.
 - ii. Saline intrusion.
 - iii. Coastal erosion.
 - iv. Incremental 'suburbanisation' and other changes, including through domestic and holiday home extensions/enlargements and paraphernalia:
 - 1. Metalling of unmade tracks;
 - 2. 'Horsiculture' – proliferation of pony paddocks, stables, Manèges, etc.;
 - 3. Road, rail and navigation improvements/changes;
 - 4. Proliferation of advertisements.
- d) Potential landscape and economic effects of change, including that driven by market changes (e.g. food prices, bio-fuel).
- e) Changes in patterns of recreation, including impacts of decline in hire boat fleet and growth of private boat ownership; higher expectation of facilities for leisure plots, holiday chalets and other accommodation.
- f) Declining boatyard and boatbuilding industry.
- g) Loss of swing bridges to fixed bridges.
- h) Major housing and employment growth planned for nearby areas, and associated potential impacts such as:
 - i. Water quality and quantity loss arising from effluent input and water supply extraction.
 - ii. Increased recreational pressure, on both visitor 'honeypots' and remoter, more tranquil and sensitive localities. Also linked to tourism.
 - iii. Traffic growth impacting on reduced safe cycling and horse-riding routes.
- i) Changes to economies, practices and ways of life that sustained local and traditional industries and skills (such as millwrights, reed and sedge cutters and boat builders) that generated and sustained the landscapes we see today.
- j) Unsympathetic design, construction and alterations.
- k) Loss of local community and/or visitor facilities, often through displacement by higher value activities (principally housing).
- l) High house prices in the rural areas could affect the willingness of some to train in traditional skills such as reed and sedge cutting as they would need to commute.
- m) Recent and likely future cuts in budgets and consequent challenges organisations face in light of reduced funds.
- n) Paleo-environmental and organic archaeological remains are especially vulnerable and significant in the Broads.

- o) Potential damage to protected wildlife sites through activities in the Broads and more development in the wider area.
- p) Major highway improvements and the threat to the special qualities of the Broads that could result.
- q) Further loss of moorings.
- r) Vulnerability of subsidised public transport services within the Broads Authority Executive Area (bus and rail).
- s) Drying out of wetland and oxidation of peat, leading to loss of finite environmental and archaeological archives as well as release of stored carbon.
- t) Coastal protection work, which may alter the dynamics of marine erosion and sediment transport.
- u) COVID19 impacts on health and the economy.
- v) As a consequence of the COVID19 pandemic, more people will /may holiday in the UK and in the Broads.
- w) Non-native species and plant disease and challenges for meeting biosecurity in a connected wetland.
- x) Boat traffic sediment stirring and direct disturbance of wildlife.
- y) Shortage of reed for thatching due to higher water levels and the detrimental impact on reedbeds and reed harvesting.

Question 3: Do you have any thoughts on this SWOT analysis?

10. Vision and Objectives

10.1 Introduction

As we start the review of the Local Plan for the Broads, it is prudent to begin with the long-term vision and objectives for the Broads, which are fundamental aspects of the Local Plan.

The long-term vision for the Broads in the current Local Plan (adopted 2019) mirrors that in the Broads Plan (adopted 2017). This was done to give consistency between these two important documents. The timing of the Local Plan review correlates with the review of the Broads Plan, and the updated vision will apply to both documents.

Officers' views on updating the vision and objectives are set out below. Members' views and any proposed amendments are now invited.

10.2 Vision

As noted above, the Broads Plan and the Local Plan for the Broads share the same Vision for the Broads. The draft Broads Plan 2022-27, which was consulted on between May and July 2022, included the following Vision for the Broads:

Biodiversity is at the heart of nature recovery. The natural environment and the beneficial goods, services and cultural values it provides from food and energy to landscape character and recreation are in good condition, used fairly and sustainably, and valued by society. In particular, the precious nature of plentiful, clean, fresh water as a fundamental resource is understood and respected by all.

We are meeting the challenges of climate change and sea level rise, and the carbon reduction targets of 'net zero' by 2040, with well-maintained soils that retain and increase the amount of carbon stored.

Wildlife flourishes and habitats are maintained, restored, expanded and linked effectively to other ecological networks. Land and water are managed in an integrated way, with local and landscape-scale management that creates resilience and space for nature and agriculture, enabling us to adapt to changing environmental, economic and social needs. The past and present importance of the waterways for navigation, biodiversity and recreation is recognised and cherished, and the asset is protected, maintained and enhanced.

This living, working, 'big skies' landscape is notable for its natural beauty, distinctive local character and historic significance. People of all ages, abilities and circumstances enjoy it as a place of escape, adventure, work, learning and tranquillity, and as a source of national pride and identity. Local communities are active in decisions about their future and sustainable living is seen in action. There is a buoyant rural economy and a viable, well-used public transport network, and local housing need is being met.

The Broads National Park is forever recognised as fundamental to our prosperity and our mental and physical health and wellbeing, and is forever treasured as a unique and special place that provides a breathing space for the cure of souls.

10.3 Current objectives

The Local plan objectives relate back to the Vision; the current objectives are in Table 2.

Table 2

Local Plan for the Broads - objectives

Ref	Objective
OBJ1.	The Broads remains a key national and international asset and a special place to live, work and visit.
OBJ2.	There are areas of true tranquillity and wildness, giving a real sense of remoteness.
OBJ3.	The Broads is a unique, highly valued and attractive environment where the landscape character and setting is protected, maintained and enhanced.
OBJ4.	The rich and varied natural environment is conserved, maintained, enhanced and sustainably managed.
OBJ5.	The coastal section of the Broads is used and managed in a beneficial and integrated way for people and wildlife.
OBJ6.	Water quality is improved and water is managed using appropriate measures to increase capture and efficiency, prevent pollution and reduce nutrients. Flood risk to people, property and landscapes is managed effectively.
OBJ7.	'Climate-smart thinking' minimises future adverse impacts and makes use of opportunities in an area vulnerable to a changing climate and sea level rise.
OBJ8.	The area's historic environment and cultural heritage are protected, maintained and enhanced. Local cultural traditions and skills are kept alive.
OBJ9.	The housing needs of the community are met.
OBJ10.	Development and change are managed to protect and enhance the special qualities of the Broads as well as the needs of those who live in, work in and visit the area. The Broads Authority maintains close cooperation with the Local Planning Authorities adjoining its executive area.
OBJ11.	The Broads offers communities and visitors opportunities for a healthy and active lifestyle and a 'breathing space for the cure of souls'.
OBJ12.	There is a buoyant and successful rural economy.
OBJ13.	The Broads is renowned for sustainable tourism and supports a prosperous tourism industry.
OBJ14.	People enjoy the special qualities of the Broads on land and on water. Access and recreation are managed in ways that maximise opportunities for enjoyment without degrading the natural, heritage or cultural resource. Navigation is protected, maintained and appropriately enhanced, and people enjoy the waterways safely.

Ref	Objective
OBJ15.	The Broads continues to be important for the function, identity and recreation of the local community as well as over a wider area.
OBJ16.	Waste is managed effectively so there is no detriment to the environment.

10.4 Potential changes to the objectives

It is proposed that the objectives could be amended to address the following aspects:

- OBJ2 - Mention dark skies specifically
- OBJ4 – mention nature recovery (more, bigger, better, joined)
- OBJ5 – reference the importance of using the nature-based solutions
- OBJ7 – refer to net zero? Include adaptation?
- OBJ9 – could include warm, energy efficient homes? Refer to the issue of second homes?
- OBJ14 – potential to refer to the tension between tourism and sustainability?

Question 4: Do you have any comments on the Vision or the objectives?

10.5 United Nations Sustainable Development Goals (UN SDGs)

The objectives of the Local Plan are assessed against the 17 UN Sustainable Development Goals (UN SDGs) (<https://sdgs.un.org/goals>) in Table 3. X denotes if the objectives relate to each other.

Table 3

Local Plan objectives and UN Sustainable Development Goals

	No poverty	Zero hunger	Good health and well-being	Quality education	Gender equality	Clean water and sanitation	Affordable and clean energy	Decent work and economic growth	Industry, innovation and infrastructure	Reduced inequalities	Sustainable cities and communities	Responsible consumption and production	Climate action	Life below water	Life on land	Peace, justice and strong institutions	Partnerships for the goals
OBJ1.			X			X		X			X		X	X	X		
OBJ2.			X			X					X		X	X	X		
OBJ3.			X								X				X		
OBJ4.			X			X					X			X	X		
OBJ5.			X								X		X	X	X		
OBJ6.						X					X	X	X	X	X		
OBJ7.			X				X			X	X	X	X	X	X		
OBJ8.				X					X		X				X		
OBJ9.	X		X								X					X	
OBJ10.			X			X			X		X	X	X	X	X		X
OBJ11.			X								X						
OBJ12.		X	X					X	X		X	X		X	X		
OBJ13.			X			X		X	X		X		X	X	X		
OBJ14.			X			X					X	X	X	X	X		
OBJ15.			X	X		X				X	X						
OBJ16.						X					X	X		X	X		

Following the assessment above, 'gender equality' does not have a related objective in the Local Plan. Planning and local plan policies do not really seek to affect genders differently. When considering needs to address in the Local Plan, we look at the population as a whole. Therefore, it is considered acceptable that there are no objectives relating to 'gender equality'.

11. The rest of this Issues and Options document

The rest of the Issues and Options identifies some specific issues. We welcome your views on these parts of the document.

It should be noted that the current Local Plan for the Broads is quite comprehensive. It is proposed that most of the policies within it will remain in the new Plan, albeit with some updates and amendments (see [section 34](#) for more on the existing policies of the Local Plan). As such, we are not addressed every topic area individually within this Issues and Options document. The following sections highlight issues that have changed over time or are new areas for the Local Plan review to consider.

The review of the Local Plan is an iterative process and the topic areas/issues in this document are not the only ones that will be included in the final Plan. Other topic areas may be included in subsequent versions of the emerging Plan. Consultation responses may also raise topics to address, and new evidence or Government requirements may be in place.

12. Your part of the Broads

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

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

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

13. Climate Change

13.1 Introduction

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

At the same time, our wetland landscape has been steadily sequestering carbon since the end of the last ice age, and now stores the equivalent of an estimated 50,000,000 tonnes of CO₂⁸. In context, that is more CO₂ than was released by all coal-burning power plants in the UK between 2015 and 2020.

The 'Future Impacts of Climate Change'⁹ by Broadland Futures Initiative says the following about how the climate could change:

- a) Winters in 20 years' time are expected to have 5-7% more rainfall, in 50 years' time 7-15% more and, in 100 years' time, 11-29% more than used to fall in winters between 1981 and 2000. Summers, on the other hand, will likely have 15-18% less rainfall in 20 years' time, 20-30% less in 50 years' time and 27-51% less in 100 years' time, compared with 1981-2000. It is possible that even greater changes in rainfall patterns could occur. However, even the minimum expected changes of 11% more rainfall in winter and 27% less rainfall in summer will require significant changes to how water is managed. For example, it is possible that river flows in winter will increase by 20%, whereas flows in summer will decrease by 40%, with implications for the likelihood of flooding and water available for irrigation, for example.
- b) Summer temperatures in 20 years' time are expected to be 1.4-1.6oC higher, in 50 years' time 1.6-3.3oC higher and, in 100 years' time, average summer temperatures could be 1.9-7.5oC higher than they were in 1981-2000. Although some of these average increases may at first appear modest, hot spells where maximum daytime temperatures exceed 30°C for two or more consecutive days will increase, and later in this century could occur up to four times per year, rather than once every 4 years as used to happen between 1981 and 2000

We need to plan now for the changes ahead, such as wetter winters, drier and hotter summers, and more frequent extreme events like storms and heavy rainfall, to lessen negative impacts and make the best use of positive opportunities of the emerging green economy.

13.2 Adaptation – climate change checklist

One of the approaches to adapting to climate change, set out in the current Local Plan, is the requirement for applicants for some types of development to fill out a [climate change checklist](#) to show how they have considered and addressed the risks that climate change

⁸ An extrapolation from the carbon stocks reported in the Queen Mary University of London Study. [Assessing carbon stocks within the peat of the Broads National Park \(broads-authority.gov.uk\)](#)

⁹ [The Future Impacts of Climate Change \(broads-authority.gov.uk\)](#)

poses to their proposed development. We intend to roll forward the climate change checklist approach, with some amendments such as making the questions clearer.

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

13.3 Energy design of new buildings

Since June 2022, the Building Regulations have been changed so 'CO₂ emissions from new build homes must be around 30% lower than current standards and emissions from other new buildings, including offices and shops, must be reduced by 27%¹⁰. It is not proposed to set a standard for energy design of new buildings in the new Local Plan for the Broads at this time.

Question 7: Do you have any thoughts on energy design of new buildings and the Local Plan?

13.4 Electric vehicle charging points

June 2022, the Building Regulations have been changed so new homes and buildings such as supermarkets and workplaces, as well as those undergoing major renovation, are required to install electric vehicle charge points. It is not proposed to set a standard for electric vehicle charging points in the new Local Plan for the Broads.

Question 8: Do you have any thoughts on electric vehicle charging points and the Local Plan?

13.5 Source of heating

Some properties in the Broads are heated by oil. The Department for Business, Energy and Industrial Strategy (BEIS) estimates that while domestic gas heating produces 3,900 tCO₂e per year, oil heating produced almost four times that at 15,300tCO₂e. The Committee on Climate Change Sixth Carbon Budget Report¹¹ recommended that for a Balanced Pathway to Net-Zero, new boilers not on the gas grid – e.g. oil-fired boilers - should be low-carbon by 2028. For properties on the gas grid, the target date is 2033. In part this is due to gas boilers having a lower CO₂ footprint per kilowatt hour of heat produced.

The new Local Plan could set out a preferred hierarchy in respect of energy. A similar approach is already taken in adopted policy DM2 in respect of wastewater treatment, which requires development to be connected to a foul sewer unless this is proven not to be feasible. The next option in the hierarchy is package treatment works with septic tanks as the least favourable option. So, there could be scope for a similar hierarchical approach, but for source of heating.

A source of heating hierarchy could be as follows. It may need to include being hydrogen ready¹² or even biomass boilers.

- a) Heat pump and underfloor heating, powered by on-site solar and batteries;

¹⁰ [New homes to produce nearly a third less carbon - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-homes-to-produce-nearly-a-third-less-carbon)

¹¹ <https://www.theccc.org.uk/publication/sixth-carbon-budget> page 110-112.

¹² [Enabling or requiring hydrogen-ready industrial boiler equipment: call for evidence - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/enabling-or-requiring-hydrogen-ready-industrial-boiler-equipment-call-for-evidence)

- b) Heat pump and underfloor heating, powered by the electricity grid;
- c) Gas heating, but with the overall heating system 'heat pump ready' (larger radiators etc) and the gas boiler 'hydrogen ready';
- d) Oil Heating, but with the overall heating system 'heat pump ready' (larger radiators etc);
- e) Gas Heating with no adaptation of the system; and
- f) Oil Heating with no adaptation of the system

There could also be benefits in requiring new developments, including extensions, to be heat pump ready (noting the hierarchy set out above). This will reduce costs and resource consumption in the long term, and make it more affordable to then switch to a low carbon heating system such as a heat pump when gas and oil boilers cease to be available.

It should be noted that towards the end of 2021 there were some Government consultations on fossil fuel heating. It could be that, during the production of the Local Plan, national standards are set:

- [Phasing out the installation of fossil fuel heating in homes off the gas grid - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/phasing-out-the-installation-of-fossil-fuel-heating-in-homes-off-the-gas-grid)
- [Phasing out the installation of fossil fuel heating systems in businesses and public buildings off the gas grid - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/phasing-out-the-installation-of-fossil-fuel-heating-systems-in-businesses-and-public-buildings-off-the-gas-grid)
- [Future support for low carbon heat - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/future-support-for-low-carbon-heat)

Question 9: Do you have any thoughts on source of heating?

- a) Do you have any thoughts on the approach of a heating hierarchy as set out above?
- b) Do you have any comments on the potential hierarchy as set out above?
- c) What about developments being heat pump ready?

13.6 Construction methods and materials used

Different materials have different embodied carbon; this makes some building materials more sustainable than others. The useful [database on the embodied carbon of building materials](#) sets out the embodied carbon of building materials¹³. There is potential to require applicants to set out a schedule of materials used and the embodied carbon, and state how they have chosen materials with less impact/embodied carbon. We would need to consider and balance any issues with design of new build.

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

13.7 Additions to other policies

The following topic areas could be incorporated into existing policies.

¹³ The figures are "Cradle to Gate" so does not include transport to the consumer, and the eventual disposal of the material.

- a) Encouraging retrofit over re-build – the re-use and improvements to buildings could be included in DM40 and DM48.
- b) Greywater recycling – this could be referenced stronger in our policy on water quality (DM2) and SuDS (DM6)
- c) Design – how sun hits building, orientation, making the most of heat from the sun could be referenced stronger in the design policy (DM43)

Question 11: Do you have any thoughts on these topic areas and how they could be included in the Local Plan? Are there other related topics that could be included?
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13.8 Other climate change related issues/policies

If you have any other ideas to mitigate or adapt to climate change, please let us know. Please include evidence and also references if the approaches you suggest have been used elsewhere.

Question 12: Do you have any other thoughts on how to address climate change in the Local Plan?
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14. Trees, woodlands, hedges and shrubs

14.1 Introduction

Trees, woodlands, hedges and shrubs are integral to the Broads landscape and add great beauty, sense of place and character. Trees and woodlands enhance the visual landscape and provide important landmarks, complementing the natural and built environment by providing screening, perspective, focal points, privacy and seclusion and defining and separating public open spaces. They also provide habitats for an exceptional range of wildlife, and form a 'carbon sink' helping to absorb and store and counteract the harmful effect of climate change.

We are also aware that in some locations, trees may not be welcomed due to possible negative impacts, such as on navigation, disturbance to peatlands, and landscape. Indeed, some areas of the Broads have a character that is open, giving vast views. In terms of the impact on navigation, trees by the edge of waterways can reduce the wind available for sailing. Trees can also encroach and even fall into the waterways, creating the need for tree management. It is also noted that the wrong types of tree would not be beneficial to the Broads. This emphasises the importance of the mantra 'the right tree in the right place'.

14.2 What the NPPF says

The NPPF at paragraph 131 says: 'trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.'

14.3 Issues

On occasion, trees, woodlands, hedges and shrubs are affected by development.

We already have policy DM13 that is a Natural Environment policy, and DM8 that relates to Green Infrastructure.

We wonder if a policy on trees, woodlands, hedges and shrubs will further the Authority's aim to preserve the variety, number and quality of trees and woodland within the Broads Authority Executive Area and to ensure that development contributes to the maintenance or enhancement of the tree and woodland cover of the Broads.

14.4 Options

- a) No specific policy. Rely on DM8 and DM13.
- b) Amend policies DM8 and DM13 to include a greater emphasis on trees, woodlands, hedges and shrubs.

- c) Have a new policy on the subject of trees, woodlands, hedges and shrubs. This would include management, maintenance and protection of existing trees, woodlands, hedges and shrubs, as appropriate, or creation of new areas for trees, woodlands, hedges and shrubs.

Question 13: Do you have any thoughts on trees, woodlands, hedges and shrubs and how we address these in the Local Plan?

15. Peat

15.1 Introduction

We introduced a policy relating to peat in the current Local Plan. The aim of the policy was to reduce the amount of peat excavated and to ensure that any peat that is excavated and/or disposed of is treated in a way that addresses its special qualities. We also produced a [guide on the excavation of peat in the Broads](#).

Peat is an abundant soil in the Broads and an important asset, providing many ecosystem services, including food production:

- a) **Climate change:** The soils formed by the Broads wetland vegetation store 38.8 million tonnes of carbon¹⁴. Peat soils release previously stored carbon when they are dry. Peat, if dried out, can emit 174kg of CO₂ per cubic metre of peat.
- b) **Biodiversity:** Peat soils support internationally important fen, fen meadow, wet woodland and lake habitats. At least 500 species are primarily associated with peat habitats in the Broads (source: Broads Biodiversity Audit). It is critical that development avoids impacts on irreplaceable habitats.
- c) **Archaeology:** Historic England has identified the Broads as an area of exceptional waterlogged heritage. Because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, giving an insight into the past.
- d) **Palaeoenvironments:** The peat has accumulated over time and thus incorporates a record of past climatic and environmental changes that can be reconstructed.
- e) **Water:** Peat soils help prevent flooding by absorbing and holding water like a sponge (peat holds 20 times its own weight in water) as well as filtering and purifying water.

15.2 Issues

The Sixth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) warns that the world is heading for temperature rises above 1.5°C as we witness widespread extreme weather and other changes likely to be irreversible for centuries to millennia.

Peat is a finite resource, taking thousands of years to develop under the right conditions. Indeed, the Government's Peat Action Plan (May 2021)¹⁵ states how important it is to keep peat wet, referring to how to restore peat as well as protect peatlands.

Given the impact of carbon dioxide release and loss of habitat, and as these are related to peat locally as set out above, we wonder if there is reason to take a firmer stance on the excavation of peat, particularly large-scale peat extractions and multiple small-scale excavations (for their cumulative impacts)? In addition, when peat is excavated, is there a

¹⁴ NCA Profile 80, Natural England and the Broads Authority's Carbon Reduction Strategy: www.broads-authority.gov.uk/_data/assets/pdf_file/0011/400052/Carbon-reduction-strategy.pdf

¹⁵ [England Peat Action Plan \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/98444/England_Peat_Action_Plan.pdf)

stronger stance of disposing of the peat so it remains wet and does not release carbon dioxide?

15.3 Options

- a) Do not have a policy on peat/reduce the requirements in the current policy.
- b) Do not change the approach as set out in policy and in the guide – so roll forward current approach.
- c) Change the emphasis so there is a stronger requirement to dispose of peat in a way that prevents it drying out. The current approach to excavating peat would be continued.
- d) Change the emphasis to reduce significantly the amount of peat excavated in the first place by making the policy stance stronger. This could be through a presumption against the excavation of peat. That being said, there would need to be circumstances where some small-scale development would be considered, perhaps using set criteria and following the mitigation hierarchy. The current approach to disposing of excavated peat would be continued.
- e) Combine options B and C – so that less peat is excavated and for any that is excavated, there is a stronger requirement to dispose of peat in a way that prevents it drying out.
- f) Potentially look into creating areas for new peat. This will take many years of course and the land would need to be found. But the Local Plan could express strong support for such a scheme.

Question 14: Do you have any thoughts on protecting peat, and on the options listed?

16. Energy efficiency of the existing housing stock

16.1 Introduction

When new buildings are built, they will need to meet the Building Regulations in place at the time of the build. In terms of replacement dwellings, this will likely result in an improvement in the energy performance of the building compared to what was there before. Sections [29.3](#) and [29.4](#) explore energy performance of new build.

16.2 Issues

Local Plans and policies can influence buildings that are yet to be built, but many more have already been built. We would like to explore how we can influence existing buildings to use less energy and use energy wiser.

In the past, there have been grants from the Government or local authorities that aid with aspects of building energy performance like insulation and boilers. Recently, there was the Green Homes Grant scheme¹⁶.

Question 15: Do we need to do more about the existing housing stock to encourage energy efficiency?

On occasion, applicants propose extending their existing buildings. The extensions will be built to the Building Regulations in place at the time of construction¹⁷ and so the extension may well use much less energy than the existing main dwelling.

Question 16: Is there scope to require an existing building that is to be extended to use less energy?

16.3 Permitted development

There are some types of extension that do not need planning permission and so any policy approach would not apply to those schemes.

16.4 Energy Performance Certificates

Energy Performance Certificates (EPCs) tell you how energy efficient a building is and give it a rating from A (very efficient) to G (inefficient). They tell you how costly it will be to heat and light your property, and what its carbon dioxide emissions are likely to be. An EPC also includes information on what the energy efficiency rating could be if you made the

¹⁶ [Green Homes Grant: make energy improvements to your home - GOV.UK \(www.gov.uk\)](#)

¹⁷ Broadly, the Part L requirements apply to buildings, or extensions of such buildings (except those of Class 7 type (see below)), or the carrying out of any work to or in connection of any such building or extension where the building:

- is a roofed construction having walls; and
- uses energy to condition the indoor climate

Source: [Exemptions from building regulations | Building Regulations | Planning Portal](#)

Class 7: The extension of a building by the addition at ground level of—

(a) a conservatory, porch, covered yard or covered way; or

(b) a carport open on at least two sides;

where the floor area of that extension does not exceed 30m², provided that in the case of a conservatory or porch which is wholly or partly glazed, the glazing satisfies the requirements of Part N of Schedule 1

Source: [The Building Regulations 2010 \(legislation.gov.uk\)](#)

recommended improvements and highlights cost effective ways to achieve a better rating¹⁸. Of course, if the EPC already rates the building as efficient, there may not be a requirement to move up the EPC ratings¹⁹.

Question 17: Is there potential to require a building that is to be extended to improve its EPC level – perhaps it is required to move up one level on the EPC ratings?

16.5 Buildings that may be difficult to make more energy efficient/use less energy

The age and style of buildings in the Broads is varied. As such, it may be that some buildings are harder to make more energy efficient than others; perhaps they are designed to have the very ventilation that some energy efficiency measures may seek to address, for example. This would be an area to explore if a policy approach is taken forward.

16.6 Benefits to occupier

Improving energy efficiency and reducing operational carbon emissions has the benefit of lowering utility bills for occupants.

16.7 Options

- a) Do not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.
- b) Require the building to move up the EPC rating.
- c) Require that a certain percentage of the budget spent on the extension is spent on improving the energy performance of the existing building.

Question 18: Do you have any thoughts on the issue of energy efficiency? Do you have any preference on the options listed above, and are there any other options to consider?

¹⁸ [Guide to Energy Performance Certificates - Energy Saving Trust](#)

¹⁹ Access to Energy Performance Certificates and Display Energy Certificates data for buildings in England and Wales: [Energy Performance of Buildings Data England and Wales \(opendatacommunities.org\)](#)

17. Flood resilience of existing dwellings

17.1 Issues

The Broads Authority regularly receives applications for extensions or refurbishment of existing properties in Flood Zone 3. These properties may have flooded in the past or may be at risk of flooding. We wonder if there is potential to require owners, through such applications, to improve the flood resilience of the rest of the property. Of course, some owners may have already implemented such measures, but others may not.

17.2 Flood-resilient buildings

The adopted [Flood Risk SPD](#) at section 7.6 discusses resilience. It says ‘flood-resilient buildings are designed and constructed to reduce the impact of flood water entering the building (through air bricks, through walls or through toilets or plug holes). As a result, no permanent damage is caused, structural integrity is maintained and drying and cleaning is easier. Flood-resistant construction can prevent entry of water or minimise the amount that may enter a building where there is short duration flooding outside with water depths of 0.6 metres or less’.

17.3 Reference to resilience in our current Local Plan

In terms of resilience and existing properties, this idea is covered to some extent in the adopted Policy SSPUBS: Pubs network, which says ‘the Authority will support appropriate proposals in accordance with other policies in this Local Plan that, inter alia, improve resilience to flood risk’. The Local Plan also discusses resilience in other places, but that tends to be in relation to new development.

17.4 Existing guidance

There is guidance available for making new build and extensions more flood resilient at: [Improving the Flood Performance of New Buildings. Flood Resilient Construction.](#)

There is also guidance for property owners who have either been flooded before, or may be concerned about being flooded, at: [SIX STEPS TO PROPERTY LEVEL FLOOD RESILIENCE, Guidance for property owners](#). This starts off by saying ‘Your property may have been flooded before or you may have seen recent news reports where property has been flooded that was not previously considered to be at risk. Understandably, you might be worried about your home, your family and your belongings. Manufacturers have developed new technologies that can be fitted to your property. When correctly installed and maintained these measures can increase the ability of your property to cope with floods or limit the damage, so allowing you to return much more quickly to your property than if you had no protection’.

The [Improving property level flood resilience: Bonfield 2016 action plan](#) sets out recommendations from the Property Level Flood Resilience Roundtable, chaired by Peter Bonfield. In 2015, the roundtable was asked to look at ways to help people protect their property and businesses from the effects of flooding. This action plan sets out what the

group has done so far, what it plans to do in the future, and its recommendations to government.

17.5 Options

- a) No policy – do not address, through the Local Plan, the issue of resilience to flooding of the existing housing stock.
- b) Require the applicant to detail what measures they will take to improve the existing situation, with the level of improvement proportionate to the scale of new development proposed (if indeed the property does not have resilience measures or may benefit from more).

Question 19: Do you have any thoughts on the issue of flood resilience of existing buildings?
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18. Wind energy

18.1 Introduction

Currently, the National Planning Policy Guidance (NPPG)²⁰ says '[Suitable areas for wind energy development](#) for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan' and also 'In the case of [wind turbines](#), a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan'.

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

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

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

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

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

18.2 Current approach

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

²⁰ [Renewable and low carbon energy - GOV.UK \(www.gov.uk\)](#)

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

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

18.3 What do other Local Planning Authorities do?

The [South Downs National Park Local Plan](#) (2019) does not designate areas for wind turbines, but has Policy SD51 which is supportive of 'small scale' turbines (up to 100Kwh). The [New Forest National Park Local Plan](#) (2020) does not include wind turbines as it was concluded that wind turbines are not suitable, with the evidence base showing that windspeeds are generally low in the New Forest. The [Exmoor National Park Local Plan](#) (2017) identifies some areas (map 5.2 on page 114) for small scale wind turbines. The [North York Moors National Park Local Plan](#) (2020), policy ENV8 supports wind turbines in areas set out in a related SPD.

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

19. Local Green Space

19.1 The NPPF and Local Green Space

The NPPF says ‘designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them’.

19.2 Local Green Space and the current Local Plan and Neighbourhood Plans

In the Local Plan for the Broads 2019, we allocate some areas as Local Green Space. These are listed below and can be found [on the Local Green Space policies map](#).

- Bridge Green, Potter Heigham
- Chedgrave Common
- Part of Waveney Meadow that is not open space, Puddingmoor, Beccles
- Land surrounding Beccles Rowing Club, Off Puddingmoor, Beccles
- The Stone Pit, Station Road, Geldeston
- The playing field, Station Road, Geldeston

We are aware that Neighbourhood Plans that are in production or already adopted often identify and allocate Local Green Spaces. We do not need to repeat those allocations in the Local Plan, as Neighbourhood Plan policies have the same weight as Local Plan policies.

19.3 Would you like to propose any other areas as Local Green spaces?

Are there other areas you would like us to consider as Local Green Spaces? If so, please complete the [nomination form](#). For a site to potentially be allocated a Local Green Space in the emerging Local Plan, nominations need to meet the following criteria:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;
- c) local in character and is not an extensive tract of land.

The NPPF also says:

- d) Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services; and
- e) Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

Question 22: If you would like to nominate a local green space, please fill out the [form](#).

If we get any nominations for Local Green Space, we will do the following:

- a) Undertake site visits
- b) May contact neighbours for their thoughts
- c) Ask the local Parish/Town Council for their thoughts on the nomination
- d) Contact the relevant district council for their thoughts
- e) Check adopted/emerging Neighbourhood Plans to ensure there is no repetition
- f) Check adopted/emerging Local Plans to see if any nominations are already protected as open space

20. Quay heading in front of quay heading

20.1 Background

Landowners may want to improve a quay heading in a particular area to maintain it in a good condition, to reflect a change of how an area is used, or to replace the quay heading at the end of its life. They may do this by placing new quay heading in front of the original quay heading, rather than removing the original quay heading. The new quay heading tends to be placed 10cm to 50cm in front of the old quay heading. Timber quay heading tends to be replaced every 10 to 15 years and steel quay every 20 to 30 years.

20.2 Issues

Placing new quay heading in front of existing quay heading at a typical distance of 10cm to 50cm reduces the width of the river in that particular location. This is a particular issue in narrower areas with high volumes of river traffic. Importantly, reducing navigable space impacts on the ability of users to navigate safely.

One of the statutory purposes of the Broads Authority is to protect the interests of navigation. The Local Plan for the Broads has a strategic policy (SP13) that seeks to protect and enhance the navigable water space.

20.3 Removing the old quay heading first

Ideally, the old quay heading would be removed first, and the new quay heading would then go in its place. This would ensure that there is no encroachment into the river. However, this is not always done because it is costly and can be technically challenging, involving excavating land behind the existing quay heading. It can also result in a destabilisation of the riverbank and potentially of land slumping into the river or broad during the works.

20.4 Are some areas more problematic than others?

There are some stretches of rivers that are both narrow and have quay heading. In some areas, a small encroachment could have a significant impact on the available channel space. Another issue to consider is how busy a stretch of water is and the typical size of vessels that use that stretch. Therefore, any policy approach could apply to certain areas.

20.5 What happens at the moment?

In planning terms, we tend to use the strategic policy SP13. Under the Broads Act 1988, certain schemes require a Works Licence and one of the considerations in issuing these licences is impact on navigation. Taking these together, we usually request that replacement quay heading is not placed more than 30cm in front of the original. However, the reason we are raising this as an issue is that in some areas we are at a critical point and need to safeguard navigation from further encroachment.

20.6 Options

- a) No specific policy approach to address quay heading in front of quay heading.
- b) Geographic risk-based approach. Map areas where the rivers are narrow and where there is already quay heading – through assessment of channel width and river usage,

areas where new quay heading being placed in front of old quay heading would impact navigation would be identified. In the areas identified as being most impacted from encroachment, the approach could be to hold the existing line of the quay heading.

- c) Have a policy that applies to all the Broads, regardless of river width. This seeks to minimise the impact through set criteria for how far quay heading could be in front of existing.

Question 23: Do you have any comments on the issue of new quay heading in front of old quay heading?

21. Water efficiency of new dwellings

21.1 Introduction

The East of England is an area of water stress. According to the Environment Agency, if no action is taken between 2025 and 2050, around 3,435 million additional litres of water per day will be needed in England to address future pressures on public water supply; within this figure it is estimated that the East of England will require an additional 570 million litres per day to meet the needs of residents and the agricultural sector, industry and energy sector²¹. Additionally, given the context of Nutrient Neutrality in which we are operating, less water used could mean less water into the waste water network so less water treated at water recycling centres with impacts on the nutrients released into waterways.

21.2 Current policy and Norfolk Strategic Planning Framework Agreement

The adopted Local Plan policy DM4 sets a water use standard of 110 litres per household per day (l/h/d), which is beyond the current building regulations requirement of 125 l/h/d. Indeed, all Norfolk Local Planning Authorities have agreed to include the 110 l/h/d in their local plans, through the [Norfolk Strategic Planning Framework](#) agreement which states at Agreement 22 that 'Norfolk is identified as an area of serious water stress. The Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development'.

21.3 Emerging policy for Greater Cambridge

We are aware that the [Greater Cambridge Local Plan](#) is considering going further than the optional standard for water usage of 110 l/h/d and proposing 80 l/h/d unless demonstrated impracticable. Their evidence suggests that current levels of abstraction in the area are believed to be unsustainable. In terms of deliverability of the 80 l/h/d standard, the proposal says 'the Integrated Water Management Study (IWMS) has shown that 80 litres/person/day is achievable by making full use of water efficient fixtures and fittings, and also water re-use measures on site including surface water and rainwater harvesting, and grey water recycling. It also shows that the cost effectiveness improves with the scale of the project, and that a site-wide system is preferable to smaller installations'.

21.4 Water neutrality

'Water neutrality' means that new development should not increase the rate of water abstraction above existing levels. It is an issue being raised and looked into in Sussex. In a position statement sent in October 2021 to Horsham, Crawley and Chichester councils, which fall within the Sussex North Water Supply Zone, Natural England laid out its concern that current levels of water abstraction are having an adverse impact on protected sites in the region and advised that developments within the Zone must not add to this impact. Natural England indicates that the matter should be addressed strategically, in partnership with other local planning authorities. Horsham District Council's response is at [Water Neutrality in Horsham District and its planning implications | Horsham District Council](#). This

²¹ [Meeting our Future Water Needs: a National Framework for Water Resources](#) (2020)

matter is early on in its investigation and the Broads Authority will keep informed of how it develops.

21.5 Scale of development in the Broads

It may be more feasible and cost effective to meet stricter water use standards over larger schemes. We do not often have large scale development in the Broads. A scheme in Ditchingham Dam (over 100 dwellings) has recently been completed, a scheme at Pegasus (76 dwellings) has been permitted, and there is an allocation for around 120 dwellings in East Norwich (Utilities Site). Schemes in the Broads, however, usually tend to be for one or two dwellings at a time.

21.6 Options

- a) Do not set a water efficiency standard – the default would be 125 l/h/d.
- b) Continue the current policy approach of 110 l/h/d
- c) Investigate whether it is reasonable or justifiable to seek a standard that designs for less water a day than 110 l/h/d.
- d) Investigate the potential to require water neutrality.

Question 24: Do you have any thoughts on the issues of water efficiency and the options listed above?
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22. Tranquillity

22.1 What is tranquillity?

Tranquillity is about more than just noise. It is also about remoteness and where you feel calm - maybe where there are few, if any, people or interruptions. When talking about tranquillity, these are common factors:

- Feeling close to nature and wildlife
- Feeling solitude and remoteness
- Hearing natural sounds
- Seeing unspoilt natural beauty

The Lake District Local Plan defines tranquillity as 'freedom from the noise and visual intrusion, including light pollution, associated with developed areas, roads, transport and traffic, and areas with intensive recreational activities and other uses that contribute to disturbance'.

22.2 Tranquillity and National Policy

The NPPF refers to tranquillity at paragraph 102b (in relation to Local Green Spaces) and paragraph 185b, which says that planning policies and decisions should 'identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason'.

The NPPG refers to tranquillity here: [Noise - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/404262/NPPG-Noise-2019-07-22.pdf)

What factors are relevant if seeking to identify areas of tranquillity?

For an area to justify being protected for its tranquillity, it is likely to be relatively undisturbed by noise from human sources that undermine the intrinsic character of the area. It may, for example, provide a sense of peace and quiet or a positive soundscape where natural sounds such as birdsong or flowing water are more prominent than background noise, e.g. from transport.

Consideration may be given to how existing areas of tranquillity could be further enhanced through specific improvements in soundscape, landscape design (e.g. through the provision of green infrastructure) and/or access.

Paragraph: 008 Reference ID: 30-008-20190722

Revision date: 22 07 2019

22.3 Dark skies and lighting

One aspect of tranquillity is lack of light pollution and good dark skies. The Broads Authority already has a policy relating to dark skies and light pollution, which it intends to take forward into the new Local Plan for the Broads.

22.4 What do National Parks do?

Dartmoor National Park Authority has a stand-alone criteria-based policy in its Local Plan. The Lake District Local Plan includes tranquillity in its policy that seeks to protect the spectacular landscape. North York Moors has a stand-alone policy with four key issues to consider: visual intrusion, noise, activity levels and traffic generation.

22.5 Tranquillity and the Broads

There are high levels of tranquillity through much of the Broads; in particular, there is a sense of remoteness in some parts despite their being located close to concentrations of housing and industry. Among the special qualities of the Broads are views, remoteness, tranquillity, wildness and 'big skies'. The Trinity Broads and Upper Thurne areas especially are considered tranquil areas in the Broads.

22.6 Options

- a) Do not address tranquillity specifically in the Local Plan. Rely on other landscape, dark skies and amenity policies that will be in the Local Plan.
- b) Improve the consideration of tranquillity in the Local Plan by including it in related policies, potentially the landscape section of the Local Plan.
- c) A stand-alone, criteria-based policy, following the example of some National Park Authority local plans. The dark skies policy remains a separate policy.
- d) As per option c, but also including the dark skies policy.
- e) Identify tranquil areas/zones with presumption against certain types of development.

Question 25: How do you think we should consider/address tranquillity in the Local Plan?

23. Farm diversification

23.1 Introduction

Agriculture is one of the main land uses in the Broads. It is an important part of local economy, important to society for the provision of food, and part of the character and vitality of countryside.

We understand that agricultural incomes are susceptible to changes to agricultural policy and political changes, BREXIT and the Payment for public goods schemes. As such, there are lots of factors that tend to be out of farmers' control that can impact income and make farming less viable. As a result, farmers may need to make changes less beneficial to the countryside. We also understand that farmers may want to look at diversification schemes that may provide more certainty and control over the use of land. Farm diversification can assist in making farms more viable and we hope to assist in that. That is why we have policy DM27 Business and Farm Diversification.

Question 26: Do you support this policy approach generally?
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The aim of the farm diversification policy is not to facilitate the renting of small parcels of land to separate individuals to run separate businesses on. This results in the fragmentation of farm holdings and inappropriate development in the countryside that would not be acceptable under other policies in the Local Plan. This is not farm diversification but subdivision of the farm holding. However, it needs to be recognised that the character of land use is one that evolves continuously and the Local Plan will test applications for changes of land use against criteria to ensure that proposals support a thriving agricultural sector and rural economy but also protecting the character of the area.

Question 27: Do you have any thoughts on this particular issue (subdivision/fragmentation) in relation to farm diversification? Do you agree that the uses should be linked, so that it remains associated with the farm?
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The point of this policy is to help farms to stay viable. We wonder if we need to ask for supporting information on how the diversification project/proposal will enable the farm to be viable. This could be in the form of a viability study. This is important as this policy may allow development which would not otherwise be allowed and so we need to be clear that the scheme will benefit the farm business.

Question 28: Do you have any thoughts on requiring supporting viability information for farm diversification projects? What other information may be required to support applications?

One way of diversifying is through the provision of holiday accommodation. This should be through the conversion of existing buildings rather than new build, unless there are particular justifications for this. This is because by converting an existing building there could be limited landscape impacts, and this approach makes use of existing buildings with

the associated embodied carbon. New build in the context of this policy covers all structures (including yurts, pods and cabins).

Question 29: Do you have any thoughts on conversion and new build in terms of farm diversification?
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In all cases, the diversified uses should only form a subsidiary part of the farming business as a whole and should not prejudice the existing or future agricultural operations. We need to consider and understand the cumulative impact of farm diversification projects on the farm as a whole. We wonder if there is a point where a farm has been diversified enough so the farming aspect is now the subsidiary part of the business.

Question 30: Do you have any thoughts on this particular issue (cumulative impact of farm diversification projects) in relation to farm diversification?

It is important to note that this section refers only to the farm diversification policy. A farmer may wish to undertake development on their farm and submit these proposals under a scheme that is not considered farm diversification. The relevant policies in the Local Plan will then be engaged and used to determine the application.

24. Agriculture development

24.1 Introduction

Agriculture is a key land use in the Broads and is important to the local economy. Indeed, we tend to receive a number of applications each year for development relating to agriculture that does not fall within the scope of Agricultural Permitted Development rights. The adopted Local Plan has policies relating to rural enterprise dwellings (DM38) and business and farm diversification (DM27). Currently, other types of agriculture development would be assessed against various policies in the Local Plan; we wonder if there is a need for a policy that helps guide agriculture development.

24.2 Issues

Policy DM1 of the current Local Plan relates to development that can impact on the Broads – Major Development. It says ‘for the purposes of this policy, ‘major development’ is defined in this Local Plan as development which has the potential to have a significant adverse impact on the Broads and its special qualities due to the development’s nature, scale and setting’.

With agriculture-related development often being at a large scale, it may have an impact on the special qualities of the Broads. On the other hand, agricultural development in some ways typifies the character and appearance of parts of the Broads. Subject to sympathetic siting and design considerations, this type of development can be less visually intrusive than a similar footprint of commercial or residential development. Agricultural development tends not to be exceptional; they tend to be standard buildings. Arguably, agricultural development may pass the tests in DM1 and the NPPF, such as being in the public interest and this being the exceptional circumstance. However, perhaps the Local Plan needs a policy specific to agricultural buildings to ensure the assessment is as clear and comprehensive as possible while still allowing for sustainable development.

Other potential issues include:

- a) After a few years in place, there may be pressure to convert the agricultural buildings into another use. While the conversion options through PD regulations are limited in the Broads Authority Executive area, is there a need to prove a longer-term financial case for the building?
- b) There are areas of intensive farming in the Broads, and the point at which an application is made for new development at a farm might be an opportunity to address issues with an existing site. The development itself may seek to address these issues, but would this be an opportunity to seek wider biodiversity/social etc benefits?
- c) Is there scope for agricultural development to aid in the production of low carbon/renewable energy?
- d) Some agriculture related applications result in new tracks/bridges. Is there scope for these to be open for the public to use?
- e) Another issue to consider is run off from farms into water courses.

It therefore seems there is potential for a new policy to cover particular aspects relating to agricultural development in the Broads that also links to the two existing farming related policies of rural enterprise dwellings and business and farm diversification.

24.3 Options

- a) No specific policy. Use existing policies to guide and determine applications for agricultural development.
- b) A new development management policy, specifically on agricultural buildings which would cover design, longevity of use, landscaping and environmental considerations as well as the justification for development and potential benefits through contributions/access/biodiversity/flood improvements.

Question 31. What are your thoughts on the need to address agriculture development in the new Local Plan? Are there any other issues to address if a policy were to be produced?

25. Marketing

25.1 Introduction

Sometimes people want to change the use of, or redevelop a site. What they want to do may not necessarily be supported by policies.

25.2 Issues

We currently require applicants to market the site/property for a sustained period of 12 months. Some people think this time period is too long.

25.3 What some other Local Planning Authorities require

Table 4 shows the period used by our six districts and some National Parks. As you can see, the time period is similar, although some are longer and some shorter.

Table 4: LPA marketing requirements

LPA	Policy and time period	Document/policy
Broadland	Policy E2 – retention of employment sites – 12 months. Policy CSU2 – Loss of community facilities or local services - 12-month marketing period.	Broadland Development Management DPD (2015)
South Norfolk	<ul style="list-style-type: none"> Policy DM 2.2 Protection of employment sites – evidence not viable and at least 6 months active professional marketing. Policy DM 3.16 Improving the level of community facilities – 6 months. 	South Norfolk Development Management DPD (2015)
North Norfolk	<ul style="list-style-type: none"> Policy E 3 - Employment Development Outside of Employment Areas - 12 months Policy HC 3 - Provision & Retention of Local Facilities – 12 months 	North Norfolk - emerging new Local Plan
East Suffolk	<ul style="list-style-type: none"> Policy WLP8.12 – Existing Employment Areas – 12 months. Policy WLP8.3 – Self Build and Custom Build – 12 months. Policy WLP8.17 – Existing Tourist Accommodation - 12 months. Policy WLP8.22 – Built Community Services and Facilities -12 months. 	Waveney Local Plan (2019)
Great Yarmouth	<ul style="list-style-type: none"> Policy CS6 – Supporting the local economy - Employment – 18 months (although the Local Plan part 2 says a shorter period could be considered with justification). Community facilitates – the Core Strategy says ‘thorough’ but no timescale but policy C1: 	Gt Yarmouth Core Strategy Local Plan and Local Plan Part 2 (2021)

LPA	Policy and time period	Document/policy
	<p>Community facilities of the Local Plan part 2 refers to change of use, 12 months</p> <ul style="list-style-type: none"> • Policy H6 - Retention and removal of existing occupationally restricted rural dwellings – 12 months • Policy L1: Holiday accommodation areas – change of use of holiday accommodation - one year 	
Norwich City	<ul style="list-style-type: none"> • Policy DM20 - Managing change in the primary and secondary retail areas and Large District Centres – 9 months • Policy DM22 - Provision and enhancement of community facilities -9 months 	Norwich Development Management DPD (2015)
Exmoor	<ul style="list-style-type: none"> • HC-D19 Safeguarding Local Commercial Services and Community Facilities - 12 months. • SE-D2 Safeguarding Existing Employment Land and Buildings - 12 months. • RT-D3 Safeguarding Serviced Accommodation - 12 months. • HC-D12 Replacement of Rural Workers • Occupancy Conditions – 12 months 	Exmoor Local Plan (2017)
Peak District	<ul style="list-style-type: none"> • DMS2 Change of use of shops, community services and facilities - 12 months. • DME4 Change of use of non-safeguarded, unoccupied or under-occupied employment sites in Core Strategy policy DS1 settlements – 12 months 	Peak District Development Management Document (2019)
Dartmoor	<ul style="list-style-type: none"> • Policy 3.9 Rural Workers' Housing – 12 months • Strategic Policy 2.8 Conservation of historic non-residential buildings in the • open countryside – 6 months • Strategic Policy 5.3 Protecting Active Uses in Dartmoor's Settlements - Retail – 12 months • Policy 5.5 Tourist accommodation – 12 months 	Dartmoor Local Plan (2021)

Question 32: What are your thoughts about the 12-month marketing period, and why?

What evidence do you have to support your view?

26. Sites allocated for change

Some sites in the current Local Plan have policies promoting change. These sites may be redundant or seem to have greater potential. The policies identify the site, give an idea of what may be acceptable (subject to the detail and other policies in the Local Plan) and identify criteria that any scheme is required to address. The aim is that, by showing that the Broads Authority would be supportive of appropriate schemes in these areas (that reflect the constraints and policies), landowners may improve the site. Table 5 shows the policies and sites currently allocated in the Broads.

Table 5

Policies and sites currently allocated in the Broads

Site	Policy no	Description	Thrust of policy
Former Loaves and Fishes, Beccles	BEC1	Property is in a good location, was a pub, but now is used for storage.	Support reintroduction of pub, or other land uses subject to passing various tests.
Marina Quays, Great Yarmouth	GTY1	Derelict buildings, with riverside location.	Support for a use that reflects and respects its location and constraints.
Brownfield land off Station Road, Hoveton	HOV3	Interesting building used for storage, unused, maybe even derelict building and vacant plot with temporary use as car park.	Support for retail and residential.
Area of former Bridge Hotel site, Potter Heigham	POT1	Hotel burnt down in 1990s, used as a car park. Other uses include sheds and café/restaurant.	Seeking public realm improvements, recreation and tourism uses, potentially holiday accommodation, but in line with policies of the Local Plan.

Question 33: Do you think we should carry on this approach of allocating land for change? Are there any other approaches to consider? Are there any other sites in the Broads that you think could benefit from such an allocation?

27.Changes/standards that may be introduced by the Government

27.1 Introduction

Over the last year or so, there have been consultations or Bills/Acts relating to the following topic areas. It seems that the Government may set standards that development needs to meet. This may be done through building regulations or other legislation/regulations.

27.5 Biodiversity/Environment Net Gain

27.5.1 Issues

The [Environment Act 2021](#) is now in place, and one part of the Act is about Biodiversity Net Gain, an approach that aims to leave the natural environment in a measurably better state than before. It is not clear when any changes will be implemented by the Government. It is likely that the requirement will be in place from November 2023 which is before this local plan will be adopted. The requirement is for a 10% net gain, measured using a metric that will be approved by Government.

27.5.2 A greater net gain than 10%? Approaches elsewhere.

The emerging Greater Norwich Local Plan says ‘it will need to be demonstrated that the gain to biodiversity is a significant enhancement (at least a 10% gain) on the existing situation’. Some other LPAs are proposing a Biodiversity Net Gain of greater than 10%:

Table 6

What some other LPAs are proposing for Biodiversity Net Gain

Local Planning Authority	Region	BNG requirement	Where the requirement is stated
East Devon	South West	20 per cent	Draft local plan - published January 2022
Greater Cambridgeshire	East of England	20 per cent	Draft local plan - published 2021
Guildford	South East	20 per cent	Draft local plan - published January 2022
Maidstone	South East	20 per cent	Draft local plan - submitted for examination on 31/03/2022
Mid Sussex	South East	10 per cent (20 per cent on significant sites)	Draft district plan - published on 19/01/2022
Mole Valley	South East	20 per cent	Draft local plan - submitted for examination on 03/02/2022
Swale	South East	20 per cent	Draft local plan - published 08/02/2022
Swindon	South West	20 per cent	Draft local plan - published December 2019

Local Planning Authority	Region	BNG requirement	Where the requirement is stated
Worthing	South East	10 per cent (20 per cent "is required for development on previously developed sites")	Draft local plan - submitted for examination on 11/06/2021

Source: Table: Samantha Eckford [Get the data](#) Created with [Datawrapper](#), published in article on Planning Resources website, 1 June 2022.

Whilst biodiversity net gain has established the net gain principle, environmental net gain goes further. It is more comprehensive and relevant across many environmental areas, including carbon storage, material use, air purification, physical health as well as recreation and water quality. It uses the concept of natural capital assets (such as soil, rivers and woodland) and ecosystem services (defined as the direct and indirect contributions of ecosystems to human survival and quality of life) as a way to assess and quantify the impact of development and operational activities on the natural environment. Indeed, the government's 25-year plan²² seeks to embed 'an 'environmental net gain' principle for development including housing and infrastructure'.

27.5.4 Options

The options therefore seem to be as follows:

- Do not set a higher standard relating to biodiversity net gain; continue with the 10% set by Government.
- Introduce a standard of greater than 10% Biodiversity Net Gain in a similar way to some other LPAs around the country.
- Introduce 'Environmental Net Gain'.

Question 34: Do you have any thoughts on these options in relation to biodiversity net gain?

27.6 Accessible homes

27.6.1 Issues

[Raising accessibility standards for new homes²³](#) was consulted on in 2020. It considers how the existing optional accessible and adaptable standard for homes and the wheelchair user standard are used and whether the Government should mandate a higher standard or reconsider the way the existing optional standards are used. It is not clear when any changes will be implemented by the Government.

²² [25-year-environment-plan.pdf \(publishing.service.gov.uk\)](#)

²³ The consultation covers these categories: M4(1) Category 1: Vitable dwellings. M4(2) Category 2: Accessible and adaptable dwellings. M4(3) Category 3: Wheelchair user dwellings.

27.6.2 Approaches elsewhere

The emerging Greater Norwich Local Plan says that proposals for major housing development are required to provide at least 20% of homes to the Building Regulation M4(2) standard or any successor. The emerging Great Yarmouth Local Plan says new homes must be built to meet Building Regulation M4(2). The emerging Dartmoor Local Plan says that all new build dwellings should be constructed in accordance with Building Regulations Requirement M4(2) for accessible and adaptable dwellings, or successive regulations, unless evidence demonstrates: a) it is not desirable or possible for planning or environmental reasons; or b) it is not viable. It goes on to say that wheelchair accessible dwellings constructed in accordance with Building Regulation M4(3), or successive regulations, will be encouraged where a specific local need for a wheelchair adaptable or accessible dwelling is identified. The Reading Local Plan says all new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations. It goes on to say that on developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations.

27.6.3 Current approach

The current policy in the Local Plan for the Broads (DM43) says that applicants are required to consider if it is appropriate for their proposed dwelling/ some of the dwellings to be built so they are accessible and adaptable and meet Building Regulation M4(2) and M4(3). If applicants do not consider it appropriate, they need to justify this. For developments of five dwellings or more, 20% will be built to meet Building Regulation M4(2).

27.6.4 Options

The options therefore seem to be as follows:

- a) Wait until the Government standard comes in. Continue with the current Local Plan approach.
- b) Amend the M4(2) threshold so it applies to more schemes in the Broads, subject to viability.
- c) Consider introducing a M4(3) standard, subject to viability.

Question 35: Do you have any thoughts on these options in relation accessible homes?

28. Design

28.1 About design and the Broads

The Broads Authority has the equivalent status to a National Park, recognised for its high landscape and built qualities. National policies are clear in outlining that proposals should preserve and enhance the special qualities of the area, with the scale and extent of development being limited and any development being sensitively located and designed to avoid and minimise adverse impact on the area.

We must seek to ensure that new development is of the highest standard of design and reflects the sensitive context in which it sits. As well as the external appearance of new buildings, they must relate well to their surroundings, including the wider landscape, enhance biodiversity and seek to tackle climate change, be safe and secure, enable good access for all, be sustainable and flood resilient.

28.2 Government and national policy and design

The [Planning White Paper of 2020](#) identified design of new build as a particular focus of the proposed planning reforms, proposing 'to bring a new focus on design and sustainability'.

In 2021, the updated NPPF required all Local Planning Authorities to prepare design guides or codes, reflecting local character and design preferences. They are intended to provide a 'local framework for creating beautiful and distinctive places'.

The Government published the [National design guide - GOV.UK \(www.gov.uk\)](#) also in 2021. The National Design Guide 'illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice'.

At the same time, the [National Model Design Code - GOV.UK \(www.gov.uk\)](#) was published which 'provides detailed guidance on the production of design codes, guides and policies to promote successful design'.

28.3 What our policy says now

Policy DM43 of the adopted Local Plan says 'all development will be expected to be of a high design quality. Development should integrate effectively with its surroundings, reinforce local distinctiveness and landscape character and preserve or enhance cultural heritage'. It then goes on to discuss various aspects of design such as mix of uses, crime prevention, accessibility and landscaping.

28.4 Planning guides

We already have some design guides in place. These relate to the design of riverbank stabilisation and moorings, as well as Waterside Bungalows and Chalets. We have some other guides on landscaping/landscape as well as biodiversity enhancements. You can see our planning guides here: [Broads planning guides \(broads-authority.gov.uk\)](#).

28.5 Design work underway

We will be updating the Local Plan policy relating to design. It is not envisaged that this will be significantly different to the existing policy, although we will need to ensure it is in accordance with the National Design Guide and National Model Design Code.

In order to meet the requirements of the NPPF, we have also started work on preparation of a Design Guide for the Broads. Early stage public consultation has helped to establish what the public value about their built environment and this is helping to inform the development of the Design Guide. The draft Design Guide for the Broads is out for consultation at the same time as the Issues and Options.

Question 36: Do you have any thoughts on how the Local Plan can ensure good design in the Broads?

29. Development boundaries

29.1 Introduction

The purpose of a development boundary is to consolidate development around existing built-up communities where there is a clearly defined settlement and where further development, if properly designed and constructed, would not be incongruous or intrusive because of the size of the settlement. Development Boundaries have the twin objectives of focusing the majority of development towards existing settlements while simultaneously protecting the surrounding countryside.

The current Local Plan for the Broads has four areas with development boundaries: Horning, Oulton Broad, Thorpe St Andrew and Wroxham and Hoveton – see the [Broads development boundaries maps](#).

Question 37: Do you have any comments on the [development boundaries](#) as they are currently drawn?

29.2 The Settlement Study (2022)

All settlements that have a significant number of dwellings within the Broads Authority Executive Area were assessed for their suitability for a development boundary. The [Broads Settlement Study](#) identifies the settlements that score highest in the assessment, and therefore have best access to services and facilities and seem to be the best places to direct development.

Question 38: Do you have any comments on the Settlement Study?

29.3 Development boundaries in the New Local Plan

We have looked into each of the highest scoring settlements to further assess the suitability of the settlements for development boundaries, as set out in the [Development Boundaries Topic Paper](#). Table 6 shows a summary of the highest scoring settlements; those settlements highlighted in green currently have development boundaries.

Question 39: Do you have any comments on the Development Boundary Topic Paper?

Table 7

Suitability of Broads' settlements for development boundaries

Settlement	District/Borough	Place in District Settlement Hierarchy	Commentary of built up area in the Broads
Norwich City	Norwich	City	The Broads part of Norwich is the river only as it flows through the centre of the City. But to the east, there are some built up areas. Cremorne Lane for example is an area of housing. The Utilities Site is an area of brownfield land that is allocated for mixed use in the current local plan. Close/adjoining the main settlement. Limited impact from flood risk.
Great Yarmouth	Great Yarmouth Borough	Main town	There are some dwellings on Riverwalk, to the south of Bure Park, near to the permission for dwellings and residential moorings. To the north of Gapton Hall Retail Park is some more urban uses, more industrial. Close/adjoining the main settlement. Seems all of the Broads part is at risk of flooding.
Beccles	Waveney	Market Town	To the east of the River Waveney are some dwellings, hotel and the Lido. There is also Hipperson's Boatyard. And Morrison's and fuel station. Close/adjoining the main settlement. Nearer to the road, no risk of flooding, but nearer to the water, flood risk. The incremental impacts of even small-scale developments or activities can ultimately have cumulative adverse effects on the local landscape character.
Thorpe St Andrew	Broadland	Fringe Parish	There are areas of housing and pubs. There are development boundaries in place already. Close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary.
Loddon	South Norfolk	Key Service Centre	There are some dwellings along Mill Road and Pyes Mill Road, but these are some distance from the main area of Loddon. There is also the Loddon Boatyard. Other than the boatyard, Mill Road and Pyres Mill Road tends not to be at risk of flooding.

Settlement	District/Borough	Place in District Settlement Hierarchy	Commentary of built up area in the Broads
Oulton Broad	Waveney	Main Town	There are areas of housing and pubs and shops. There are development boundaries in place already. The scheme at the former Pegasus boatyard site has permission. Close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary.
Hoveton	North Norfolk	Small Growth Town	There are areas of housing, shops, boatyards and pubs. There are development boundaries in place already. There is also an allocation on Station Road in the current Local Plan. Close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary.
Brundall	Broadland	Key Service Centre	Boatyards and residential to the south of the railway. Entire areas subject to policies in the Local Plan already. Over the railway from the main settlement. Most of the riverside area is at risk of flooding.
Bungay	Waveney	Service Centre	Built up areas to the south of the River Waveney, especially along Bridge Street. Close/adjoining the main settlement. Development likely to have adverse effects on landscape character.
Wroxham	Broadland	Key Service Centre	There are areas of housing, shops, boatyards and pubs. There are development boundaries in place already. Close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary.
Trowse with Newton	South Norfolk	Fringe Parish	Ski centre, campsite and a few dwellings along Whitlingham Lane somewhat separated from the main settlement. Flood risk to the west of the Lane. No obvious extensions to the neighbouring LPA's settlement boundary.
Coltishall	Broadland	Village cluster	Dwellings and pubs along Anchor Street and Wroxham Road somewhat separated from the main settlement. Tends to be limited flood risk away from the river. Quite sensitive having a conservation area etc.

Settlement	District/Borough	Place in District Settlement Hierarchy	Commentary of built up area in the Broads
Reedham	Broadland	Village cluster	Dwellings, pubs and retail along the Riverside. Close/adjoining the main settlement. Some flood risk mainly up to the road itself. Visual impacts of built development could detract from the perceived naturalness and tranquillity of the area
Ditchingham Dam	Waveney	Open Countryside	North of the River Waveney, with some dwellings and business park. Over the river from the main settlement of Bungay. Most the area at risk of flood zone 2.
Ditchingham	South Norfolk	Village cluster	Ditchingham Maltings development, with some other dwellings near the Yarmouth Road/Ditchingham Dam roundabout. Also, sports facilities. Over the A143 from the main settlement. Limited flood risk issue – flood zone 2 if there is a risk.
Chedgrave	South Norfolk	Key Service Centre	Dwellings and boatyards to the north of the River Chet, and off Wherry Close. Close/adjoining the main settlement. Flood risk an issue for most of the built-up area.
Horning	North Norfolk	Small growth village	There are areas of housing, shops, boatyards and pubs. There are development boundaries in place already close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary. Capacity issues at Horning Water Recycling Centre a constraint.
Stalham Staithe	North Norfolk	Small Growth Town	There are areas of housing, shops, boatyards and pubs. Over the A149 from the main settlement. Some flood risk nearer the boatyard/river. Proximity of A149, settlement and large boatyards make this area less sensitive. Policy STA1 includes some landscape requirements which would help safeguard landscape character.

Settlement	District/Borough	Place in District Settlement Hierarchy	Commentary of built up area in the Broads
Ludham	North Norfolk	Large Growth Villages	Some boatyards and dwellings around Womack Water. Away from the main settlement. Most of the built-up areas are at risk of flooding. Womack water has special qualities which would be vulnerable to further development
Cantley	Broadland	Village cluster	Some dwellings along Station Road which are close/adjoining the main settlement as well as the Sugar Beat Factory. Parts of Station Road and parts of the Factory not at risk of flooding.
Filby	Great Yarmouth	Secondary Village	Dwellings and pubs to the west of Thrigby Road. Generally, the settlement is linear in nature. Generally, nearer the road, no flood risk, but nearer the Broad, tends to be at risk of flooding.

29.4 Development boundaries in the new Local Plan

We are minded at this stage to roll forward the four current development boundaries. We wonder if you have any thoughts on other settlements that could have development boundaries, considering the information in the Development Boundary Topic Paper.

Question 40: Do you have any suggestions for other development boundaries in the Broads? Please explain your suggestion.

29.5 The option of not having development boundaries

We would like to take this opportunity to hear what you think about the option of not having development boundaries, but instead having certain criteria to guide the location of development.

Question 41: What are your thoughts about not having development boundaries?

30. Meeting the development needs of the Broads

30.1 The Broads and development

As set out in Section 5 of the Local Plan, there are many constraints to development. For example, flood risk, rural nature of the area as well as landscape and biodiversity considerations. Indeed, the NPPF at paragraph 176 says *'great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas'*.

30.2 Housing need

As we start to review and produce a new, updated Local Plan, it is necessary to assess the housing need figure again.

The NPPF says at paragraph 8 'that a sufficient number and range of homes can be provided to meet the needs of present and future generations.'

The NPPF goes on to say, at paragraphs 60 and 61 'to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay' and 'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signal'.

30.2.1 Current housing need

The 2019 Local Plan was the first Local Plan for the Broads to include a housing need figure. The need figure was 286 dwellings or 11.43 dwellings a year.

According to annual monitoring, we have permitted the following number of net new dwellings:

- 2019/20: 21 dwellings
- 2020/21: 7 dwellings
- 2021/22: 21 dwellings

30.2.2 Calculating housing need for the new Local Plan

Most Local Planning Authorities now have their housing need calculated using the Standard Methodology. The NPPG says that the 'standard method uses a formula to identify the

minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply’.

However, the standard method does not apply to the Broads. The NPPG says ‘where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, where local authority boundaries have changed due to reorganisation within the last 5 years or local authority areas where the samples are too small, an alternative approach will have to be used. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels.’

Working with Great Yarmouth Borough Council, who were commissioning work on their housing need at the same time as us, we commissioned ORS Consultants to calculate the housing need for the entire Broads area. The [study](#) was completed in May 2022 and identifies a housing need for the Broads from 2021 to 2041 as follows:

Table 8

Projected Dwellings needed for the Broads by Local Authority

Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	East Suffolk
105	97	6	68	59	23

Overall housing need for 2021-41 of 358 dwellings, or 17.9 dwellings per annum.

It is important to note that the need for the Broads is part of the need of the districts and is not additional to the need of the districts.

Question 42: do you have any thoughts or comments on the study and the housing need for the Broads?

30.2.3 Meeting the need

a) Permissions and completions

We will assess the permissions and completions since April 2021 as we produce the Local Plan for the Broads. At the time of writing, 21 net new dwellings had been permitted and 7 net new dwellings had been completed between April 2021 and end of March 2022. This leaves a need for 330 dwellings. As time goes by in producing the Local Plan, the number permitted or completed will change.

b) Sites currently allocated in the Local Plan

We also have some sites allocated in the current local plan for housing. Here are the sites and also the progress.

Table 9

Sites allocated in the current Local Plan and their progress

Site	Location	Number of dwellings	Progress to date
Policy HOV3: Brownfield land off Station Road, Hoveton	Hoveton	Estimated at 6 dwellings	Informal discussions with landowner.
Policy NOR1: Utilities Site	Norwich	Estimated at 120 dwellings	East Norwich Masterplan underway.
Policy OUL2: Oulton Broad - Former Pegasus/Hamptons Site	Oulton Broad	76 dwellings	Permitted, started, but no dwellings completed.
Policy STO1 Land adjacent to Tiedam, Stokesby	Stokesby	4 dwellings	Permitted, not started, no dwellings completed.
Policy THU1: Tourism development at Hedera House, Thurne	Thurne	16 dwellings	Permitted, not started, no dwellings completed.

It is likely that all the allocations will continue in the new Local Plan as the three permitted schemes are not completed yet and HOV3 and NOR1 have not been permitted. We will ensure to not double count permitted schemes and allocated schemes.

c) Duty to Cooperate

If a Local Planning Authority cannot meet their housing need, they can work with neighbouring Local Planning Authorities through the Duty to Cooperate. We used this approach to meet some of our need in the current Local Plan. Working with Great Yarmouth Borough Council, it was agreed that they would provide 40 dwellings. We may work with our districts in order to meet the need for housing in the Broads.

30.3 Residential moorings

As we start to review and produce a new, updated Local Plan, it is necessary to assess the residential moorings need figure again. The Housing and Planning Act 2016 sets out the requirement to understand the need for those living on boats.

30.3.1 Current residential moorings need

The 2019 Local Plan was the first Local Plan for the Broads to include a residential mooring need figure. The need figure was 63 residential moorings.

According to annual monitoring, we have permitted 12 residential moorings (at Marina Quays in Great Yarmouth).

30.3.2 Calculating the residential moorings need for the new Local Plan

We commissioned RRR Consultancy to calculate the housing need for the entire Broads area. The study [<insert link>](#) was completed in July 2022 and identifies a residential mooring need of 48, as follows:

Table 10

Residential moorings need to 2041

Permanent residential moorings need	
2021-2026	45
2026-2031	1
2031-2036	1
2036-2041	1
Total	48

30.3.3 Sites currently allocated in the Local Plan

We have some sites allocated in the current local plan for residential moorings. Here are the sites and also the progress.

Table 11

Sites allocated in the current Local Plan and their progress

Site	Location	Number of residential moorings	Progress to date
Policy BRU6: Brundall Gardens	Brundall gardens	5	None

Site	Location	Number of residential moorings	Progress to date
Policy CHE1: Greenway Marine residential moorings	Chedgrave	5	None
Policy HOR9: Horning Residential Moorings (Ropes Hill)	Horning	6	None
Policy LOD1: Loddon Marina Residential Moorings	Loddon	10	Early discussions with landowner.
Policy SOM1: Somerleyton Marina Residential Moorings	Somerleyton	10	None

Question 43: do you have any thoughts or comments on the study and the residential moorings need for the Broads?

30.4 Gypsy, Traveller and Travelling Showpeople

30.4.1 Gypsy and Travellers

The [Planning policy for traveller sites](#) says 'local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities'.

We worked with other Norfolk LPAs in 2017 to assess the [Gypsy, Traveller and Travelling Showpeople](#) need. This calculated the need as zero for the Broads.

30.4.2 Gypsy and Traveller Need in Great Yarmouth

Over the past two or three years, it has become apparent that there are and have been some unauthorised Gypsy and Traveller encampments/development in the Broads part of Great Yarmouth Borough, which would result in a need for pitches.

Recently, we worked with Great Yarmouth Borough Council (GYBC) to investigate the need for Gypsy and Traveller sites Borough-wide. RRR Consultants were commissioned to undertake the Gypsy and Traveller Need Study which can be found [here](#). They concluded the need as follows:

Table 12

Gypsy and Traveller need to 2041

Period	Number of pitches
2022-2027	7
2027-2032	1
2032-2037	1
2037-2041	1
Total 2022-2041	10

It should be noted that we intend to undertake an addendum to this study in the next year or two to update it to reflect any other unauthorised pitches in the Cobholm Island area of Great Yarmouth.

30.4.3 The Gypsy and Traveller need in other parts of the Broads

We know there is a need in GYBC area and that is partly because of some unauthorised encampments/developments in the Broads part of the Borough.

We are not aware of any unauthorised encampments/developments and there are no permitted Gypsy and Traveller sites or pitches elsewhere in the Broads.

We are aware that GNLP Commissioned an [addendum](#) to the 2017 needs study. This sought to update the figures as the Greater Norwich Local Plan was submitted for examination. This addendum did not identify any need for the Broads.

We will work with the other 5 district councils over the coming years regarding any updated work on the need for Gypsy and Travellers. But as things currently stand, there is a need in the GYBC area of the Broads and nowhere else in the Broads.

Question 44: Do you have any thoughts on Gypsy and Travellers and the Local Plan?

30.5 Residential Caravans

30.5.1 Residential caravans

The [Housing and Planning Action 2016](#) requires the need of those residing in caravans to be considered. These are caravans that are used for residential – they are not holiday caravans or gypsy, traveller and travelling show people caravans.

We worked with other Norfolk LPAs in 2017 to assess the [residential caravan need](#). This calculated the need for the Broads as zero.

30.5.2 Residential Caravan Need in Great Yarmouth

Recently, we worked with Great Yarmouth Borough Council to investigate the need for residential caravans Borough-wide. RRR Consultants were commissioned to undertake the Gypsy and Traveller Need Study which can be found [here](#). They concluded the need as follows.

Table 13

Residential caravan need to 2041

Summary of accommodation needs 2022-41 (residential caravan pitches)					
	2022-27	2027-32	2032-37	2037-41	2022-41
Broads Authority	12	0	0	0	12

It should be noted that we intend to undertake an addendum to this study in the next year or two to update it to reflect any other unauthorised pitches in the Cobholm Island area of Great Yarmouth.

30.5.3 The residential caravan needs in other parts of the Broads

We know there is a need in GYBC area and that is partly because of some unauthorised encampments/developments in the Broads part of the Borough.

We will work with the other 5 district councils over the coming years regarding any updated work on the need for residential caravans. But as things currently stand, there is a need in the GYBC area of the Broads and nowhere else in the Broads.

Question 45: Do you have any thoughts on residential caravans and the Local Plan?

30.6 Call for Sites

We are undertaking a call for sites for residential dwellings, residential moorings (both Broads-wide) and gypsy and traveller sites and residential caravans (both in Great Yarmouth Borough only).

This will require the provision of information and a form is available. This needs to be completed in full and submitted to the Broads Authority for assessment by **xxxx** (the date the consultation on the Issues and Options ends).

We will work with stakeholders to assess any sites brought forward. We cannot guarantee that your site will be allocated as we may not deem it suitable for allocation in the Local Plan. We will set out our reasons for any decision we make. As set out in section 5, there are many constraints to development in the Broads.

We will work with stakeholders to assess any sites brought forward. We cannot guarantee that your site will be allocated as we may not deem it suitable for allocation in the Local Plan. We will set out our reasons for any decision we make. As set out in section 5, there are many constraints to development in the Broads.

If you wish to put a site forward for us to consider for residential dwellings, residential moorings (both Broads-wide) and gypsy and traveller sites and residential caravans (both in Great Yarmouth Borough only), please fill out the survey at **<insert link>**

31. Our existing policies

At this stage of the Local Plan review process we are not consulting on the policies themselves; that will be in the next stage. However, we want to ask you what you think of the adopted policies in the current [Local Plan for the Broads \(2019\)](#).

Would you like to propose any policy changes? If so, it would be helpful if you tell us exactly what changes to which policies you would like to see, and why. We cannot guarantee that we will make the changes, but we would like to hear your thoughts. Please provide any evidence to justify your proposed amendments. The following is a list of the adopted policies in the Local Plan 2019, with the page number shown first.

24 SP1: DCLG/PINS Model Policy	67 DM16: Development and Landscape
24 DM1: Major Development in the Broads	68 DM17: Land Raising
27 DM2: Water Quality and Foul Drainage	69 DM18: Excavated material
29 DM3: Boat wash down facilities	70 DM19: Utilities Infrastructure Development
30 DM4: Water Efficiency	71 DM20: Protection and enhancement of settlement fringe landscape character
31 SP2: Strategic Flood Risk Policy	73 DM21: Amenity
31 DM5: Development and Flood Risk	74 DM22: Light pollution and dark skies
35 DM6: Surface water run-off	75 SP8: Getting to the Broads
40 DM7: Open Space on land, play, sports fields and allotments	76 SP9: Recreational Access around the Broads
42 DM8: Green Infrastructure	77 DM23: Transport, highways and access
45 SP3: Climate Change	79 DM24: Recreation Facilities Parking Areas
46 DM9: Climate Smart Checklist	81 SP10: A prosperous local economy
48 SP4: Soils	81 SP11: Waterside sites
49 DM10: Peat soils	82 DM25: New Employment Development
52 SP5: Historic Environment	83 DM26: Protecting General Employment
53 DM11: Heritage Assets	85 DM27: Business and Farm Diversification
56 DM12: Re-use of Historic Buildings	86 DM28: Development on Waterside Sites
59 SP6: Biodiversity	89 SP12: Sustainable Tourism
59 DM13: Natural Environment	90 DM29: Sustainable Tourism and Recreation Development
64 DM14: Energy demand and performance	
65 DM15: Renewable Energy	
67 SP7: Landscape Character	

92 DM30: Holiday Accommodation – New Provision and Retention	141 DM50: Leisure plots and mooring plots
94 SP13: Navigable Water Space	142 DM51: Retail development in the Broads.
95 DM31: Access to the Water	144 ACL1: Acle Cemetery Extension
96 DM32: Riverbank stabilisation	146 ACL2: Acle Playing Field Extension
97 SP14: Mooring Provision	147 BEC1: Former Loaves and Fishes, Beccles
97 DM33: Moorings, mooring basins and marinas.	147 BEC2: Beccles Residential Moorings (H. E. Hipperson's Boatyard)
101 SP15: Residential development	148 BRU1: Riverside chalets and mooring plots
106 DM34: Affordable Housing	150BRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line
110 DM35: Residential Development within Defined Development Boundaries	150 BRU3: Mooring Plots
113 DM36: Gypsy, Traveller and Travelling Show People	151 BRU4: Brundall Marina
115 DM37: New Residential Moorings	152 BRU5: Land east of the Yare public house
119 DM38: Permanent and Temporary Dwellings for Rural Enterprise Workers	152 BRU6: Brundall Gardens
121 DM39: Residential Ancillary Accommodation	153 CAN1: Cantley Sugar Factory
123 DM40: Replacement Dwellings	155 CHE1: Greenway Marine Residential Moorings
124 DM41: Elderly and Specialist Needs Housing	156 DIL1: Dilham Marina (Tyler's Cut Moorings)
125 DM42: Custom/self-build	157 DIT1: Maltings Meadow Sports Ground, Ditchingham
127 DM43: Design	158 DIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck
131 SP16: New Community Facilities	159 FLE1: Broadland Sports Club
131 DM44: Visitor and Community Facilities and Services	160 GTY1: Marina Quays (Port of Yarmouth Marina)
134 DM45: Designing Places for Healthy Lives	161 HOR1: Car Parking
135 DM46: Safety by the Water	162 HOR2: Horning Open Space (public and private)
137 DM47: Planning Obligations and Developer Contributions	162 HOR3: Waterside plots
139 DM48: Conversion of Buildings	163 HOR4: Horning Sailing Club
140 DM49: Advertisements and Signs	

164 HOR5: Crabbett's Marsh	191 SOM1: Somerleyton Marina residential moorings
165 HOR6: Horning - Boatyards, etc. at Ferry Rd. & Ferry View Rd.	193 STA1: Land at Stalham Staithe (Richardson's Boatyard)
166 HOR7: Woodbastwick Fen moorings	194 STO1 Land adjacent to Tiedam, Stokesby
167 HOR8: Land on the Corner of Ferry Road, Horning	195 TSA1: Cary's Meadow
168 HOR9: Horning Residential Moorings (Ropes Hill)	196 TSA2: Thorpe Island
170 HOV1: Green Infrastructure	198 TSA3: Griffin Lane – boatyards and industrial area
171 HOV2: Station Road car park	199 TSA4: Bungalow Lane – mooring plots and boatyards
171 HOV3: Brownfield land off Station Road, Hoveton	200 TSA5: River Green Open Space
173 HOV4: BeWILDerwood Adventure Park	200 THU1: Tourism development at Hedera House, Thurne
175 HOV5: Hoveton Town Centre	202 WHI1: Whitlingham Country Park
178 LOD1: Loddon Marina Residential Moorings.	203 SSTRI: Trinity Broads
179 NOR1: Utilities Site	204 SSUT: Upper Thurne
182 NOR2: Riverside walk and cycle path	205 SSCOAST: The Coast
182 ORM1: Ormesby waterworks	206 SSROADS: Main road network
183 OUL1: Boathouse Lane Leisure Plots	207 SSMILLS: Drainage Mills
184 OUL2: Oulton Broad - Former Pegasus/Hamptons Site	209 SSPUBS: Waterside Pubs Network
185 OUL3: Oulton Broad District Shopping Centre	211 SSSTATIONS: Railway stations/halts
188 POT1: Bridge Area	211 SSTRACKS: Former rail trackways
189 POT2: Waterside plots	213 SSLGS: Local Green Space
190 POT3: Green Bank Zones	213 SSSTAITHES: Staithe
190 SOL1: Riverside area moorings	214 SSA47: Changes to the Acle Straight (A47T)

Question 46: Do you have any comments on the current policies in the Local Plan (2019)?

32. Next steps

This Issues and Options consultation runs from xxx to xxx.

At the end of the consultation period, we will collate and respond to all the comments received. We will then use this input to help shape the next stage of the draft Local Plan, which is the **Preferred Options**. The Preferred Options will include policies and other options being considered, and we will consult on this document.

Appendix 1: Privacy notice

Personal data

The following is to explain your rights and give you the information you are entitled to under the Data Protection Act 2018. For more information, see the [Broads Authority Data Protection Policy](#).

The Broads Authority will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will be made publicly available as part of the process. It will not however be sold or transferred to third parties other than for the purposes of the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer.

The Broads Authority is the data controller. The Data Protection Officer can be contacted at dpo@broads-authority.gov.uk or (01603) 610734.

2. Why we are collecting your personal data. Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters. We will also contact you about later stages of the Local Plan process.

3. Our legal basis for processing your personal data. The Data Protection Act 2018 states that, as a Local Planning Authority, the Broads Authority may process personal data as necessary for the effective performance of a task carried out in the public interest, i.e. a consultation.

4. With whom we will be sharing your personal data. Your personal data will not be shared with any organisation outside of MHCLG. Only your name and organisation will be made public alongside your response to this consultation. Your personal data will not be transferred outside the EU.

5. For how long we will keep your personal data, or criteria used to determine the retention period. Your personal data will be held for 16 years from the closure of the consultation in accordance with our Data and Information Retention Policy. A copy can be found here <http://www.broads-authority.gov.uk/about-us/privacy>.

6. Your rights, e.g. access, rectification, erasure. The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a) to see what data we have about you
- b) to ask us to stop using your data, but keep it on record
- c) to ask to have all or some of your data deleted or corrected
- d) to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be used for any automated decision making.

Appendix 2: List of Parishes (and Towns and City) in the Broads

Parish	District
Strumpshaw CP	Broadland District Council
Cantley, Limpenhoe and Southwood CP	Broadland District Council
Reedham CP	Broadland District Council
Freethorpe CP	Broadland District Council
Beighton CP	Broadland District Council
Halvergate CP	Broadland District Council
Salhouse CP	Broadland District Council
Woodbastwick CP	Broadland District Council
Brundall CP	Broadland District Council
Acle CP	Broadland District Council
Crostwick CP	Broadland District Council
Wroxham CP	Broadland District Council
South Walsham CP	Broadland District Council
Horstead with Stanninghall CP	Broadland District Council
Coltishall CP	Broadland District Council
Belaugh CP	Broadland District Council
Upton with Fishley CP	Broadland District Council
Thorpe St. Andrew CP	Broadland District Council
Postwick with Witton CP	Broadland District Council
Thorpe St. Andrew CP (DET)	Broadland District Council
Carlton Colville CP	East Suffolk Council
Oulton CP	East Suffolk Council
Somerleyton, Ashby and Herringfleet CP	East Suffolk Council
Mettingham CP	East Suffolk Council
Shipmeadow CP	East Suffolk Council
Barsham CP	East Suffolk Council
Worlingham CP	East Suffolk Council
Beccles CP	East Suffolk Council
North Cove CP	East Suffolk Council
Barnby CP	East Suffolk Council
Oulton Broad CP	East Suffolk Council
Blundeston CP	East Suffolk Council
Flixton CP	East Suffolk Council
Bungay CP	East Suffolk Council
Belton with Browston CP	Great Yarmouth Borough Council
Bradwell CP	Great Yarmouth Borough Council
Ashby with Oby CP	Great Yarmouth Borough Council
Mautby CP	Great Yarmouth Borough Council
Martham CP	Great Yarmouth Borough Council
Hemsby CP	Great Yarmouth Borough Council
Fritton and St. Olaves CP	Great Yarmouth Borough Council
Stokesby with Herringby CP	Great Yarmouth Borough Council

Burgh Castle CP	Great Yarmouth Borough Council
Fleggburgh CP	Great Yarmouth Borough Council
Great Yarmouth (town)	Great Yarmouth Borough Council
Rollesby CP	Great Yarmouth Borough Council
Repps with Bastwick CP	Great Yarmouth Borough Council
Filby CP	Great Yarmouth Borough Council
West Caister CP	Great Yarmouth Borough Council
Ormesby St. Michael CP	Great Yarmouth Borough Council
Somerton CP	Great Yarmouth Borough Council
Winterton-on-Sea CP	Great Yarmouth Borough Council
Thurne CP	Great Yarmouth Borough Council
Neatishead CP	North Norfolk District Council
Smallburgh CP	North Norfolk District Council
Sutton CP	North Norfolk District Council
Horsey CP	North Norfolk District Council
Dilham CP	North Norfolk District Council
Stalham CP	North Norfolk District Council
Brumstead CP	North Norfolk District Council
Honing CP	North Norfolk District Council
Ingham CP	North Norfolk District Council
Hoveton CP	North Norfolk District Council
Horning CP	North Norfolk District Council
Barton Turf CP	North Norfolk District Council
Ludham CP	North Norfolk District Council
Potter Heigham CP	North Norfolk District Council
Catfield CP	North Norfolk District Council
Hickling CP	North Norfolk District Council
East Ruston CP	North Norfolk District Council
Sea Palling CP	North Norfolk District Council
Norwich City	Norwich City Council
Aldeby CP	South Norfolk District Council
Burgh St. Peter CP	South Norfolk District Council
Surlingham CP	South Norfolk District Council
Haddiscoe CP	South Norfolk District Council
Geldeston CP	South Norfolk District Council
Gillingham CP	South Norfolk District Council
Wheatacre CP	South Norfolk District Council
Heckingham CP	South Norfolk District Council
Chedgrave CP	South Norfolk District Council
Carleton St. Peter CP	South Norfolk District Council
Claxton CP	South Norfolk District Council
Langley with Hardley CP	South Norfolk District Council
Norton Subcourse CP	South Norfolk District Council
Thurlton CP	South Norfolk District Council
Loddon CP	South Norfolk District Council

Rockland St. Mary CP	South Norfolk District Council
Trowse with Newton CP	South Norfolk District Council
Earsham CP	South Norfolk District Council
Ditchingham CP	South Norfolk District Council
Broome CP	South Norfolk District Council
Ellingham CP	South Norfolk District Council
Kirby Bedon CP	South Norfolk District Council
Bramerton CP	South Norfolk District Council